September ____ , 2023

The Honorable Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare and Medicaid Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Administrator Brooks-LaSure:

We greatly appreciate that the CY2024 Medicare Physician Fee Schedule (MPFS) Proposed Rule includes a request for comments on evaluation and management (E/M) codes and we urge you to give full consideration to feedback provided by the Infectious Diseases Society of America (IDSA) about the importance of properly valuing inpatient E/M codes to better enable recruitment of infectious diseases (ID) physicians. Medical students and residents report high levels of interest in the field of ID, but financial barriers, namely low reimbursement compared to other specialties, are a barrier to entering the field.

We are concerned about the current state of the ID physician workforce, including:

- Nearly 80% of U.S. counties do not have a single ID physician.
- Only 56% of ID training programs filled in 2022.
- ID physicians are among the lowest paid medical specialists, with average compensation below general internal medicine, despite their additional 2-3 years of training.

ID physicians are critical to support many types of life-saving care that carry a high risk of infections, including cancer chemotherapy, organ transplantation, complex surgeries and treatment of various conditions that involve immunosuppressing medicines. In addition, ID physicians help build community resiliency in the face of outbreaks and pandemics.

It appears that CMS can incentivize more medical students to enter the infectious diseases field by modifying its reimbursement policy and it is worthwhile for your agency to consider IDSA’s insight and views as CMS decides whether changes to the E/M codes are appropriate.

Thank you for your attention to this important issue.

Sincerely,