



August 13, 2025

The Honorable Greg Murphy
United States House of Representatives
407 Cannon House Office Building
Washington, DC 20515

The Honorable John Joyce
United States House of Representatives 2102
Rayburn House Office Building
Washington, DC 20515

The Honorable Bob Onder
United States House of Representatives 1113
Longworth House Office Building
Washington, DC 20515

The Honorable Jimmy Panetta
United States House of Representatives
200 Cannon House Office Building
Washington, DC 20515

The Honorable Raul Ruiz
United States House of Representatives
1319 Longworth House Office Building
Washington, DC 20515

The Honorable Kim Schrier
United States House of Representatives
1111 Longworth House Office Building
Washington, DC 20515

Dear Congressmen Murphy, Panetta, Joyce, Ruiz, Onder, and Schrier:

On behalf of the American Osteopathic Association (AOA), and the nearly 200,000 osteopathic physicians (DOs) and medical students we represent, thank you for introducing the *No Surprises Act Enforcement Act*. This legislation would reinforce the gains made in the *No Surprises Act* to ensure patients and providers are protected from surprise medical bills.

When the *No Surprises Act* was signed into law in December of 2020, the AOA was proud to support a legislation that would protect both patients and providers while also reigning in exploitative practices by insurers. Unfortunately, as the U.S. Departments of Health and Human Services, Labor, and the Treasury began implementing the *No Surprises Act*, it became clear that the practical application of the law would not reflect Congressional intent. Initial rulemaking included a definition of qualifying payment amount (QPA) that would often yield significantly lower payments than physicians and hospitals were owed, and rulemaking relied too heavily on QPA when evaluating possible payment factors in the independent dispute resolution (IDR) process.

Unfortunately, the rulemaking forced physicians to either accept the median in-network rate as payment in full for out-of-network care, or not be paid at all. Moreover, physicians whose claims were successful in the IDR process often did not receive the payments they were owed, as penalties for insurers who failed to pay were insufficient.

This legislation would enhance the *No Surprises Act* and would align it with the original intent of Congress by improving enforcement via increased penalties for non-compliance and improving transparency within the IDR process. These changes would not only allow physicians and patients to feel secure when seeking or delivering care, but would hold bad actors within our healthcare system accountable.

Again, thank you for your dedicated leadership, and thoughtful consideration on this essential issue. The AOA and our members stand ready to assist you in securing the enactment of this important legislation. If you have any questions or if the AOA can be a resource, please contact AOA Vice President of Public Policy, John-Michael Villarama, at jvillarama@osteopathic.org, or (202) 349-8748.

Sincerely,

Robert G.G. Piccinini, DO, D.FACN
President, AOA

Kathleen S. Creason, MBA
Interim Chief Executive Officer, AOA