

October 5, 2020

Seema Verma, MPH
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Attn: CMS-1734-P
P.O. Box 8016
Baltimore, MD 21244-8016

RE: Medicare Program; CY 2021 Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment Policies; Medicare Shared Savings Program Requirements; Medicaid Promoting Interoperability Program Requirements for Eligible Professionals; Quality Payment Program; Coverage of Opioid Use Disorder Services Furnished by Opioid Treatment Programs; Medicare Enrollment of Opioid Treatment Programs; Electronic Prescribing for Controlled Substances for a Covered Part D Drug under a Prescription Drug Plan or an MA-PD plan; Payment for Office/Outpatient Evaluation and Management Services; Hospital IQR Program; Establish New Code Categories; and Medicare Diabetes Prevention Program (MDPP) Expanded Model Emergency Policy (CMS-1734-P)

Dear Administrator Verma:

The undersigned audiologists and speech-language pathologists (SLPs) who treat Medicare beneficiaries write to offer comments on the Calendar Year (CY) 2021 Medicare Physician Fee Schedule (MPFS) proposed rule. We are dismayed by the payment cuts that we and many of our colleagues from other specialties face in 2021 because of the updates to office/outpatient evaluation and management (E/M) services. Therefore, we join our national association, the American Speech-Language-Hearing Association (ASHA), urging the Centers for Medicare & Medicaid Services (CMS) to use its authority under the current public health emergency (PHE) to waive the budget neutrality requirement for the new office/outpatient E/M services policy.

Audiologists specialize in preventing, assessing, and treating hearing and balance disorders. SLPs identify, assess, and treat speech, language, swallowing, and cognitive impairments. Medicare beneficiaries must have continued access to our medically necessary diagnostic and therapeutic services to meet their functional goals.

We support the payment increases for our colleagues in primary care and we also understand that CMS must keep the Medicare program budget neutral. However, as providers who *cannot* bill E/M codes a part of our benefit categories, we do not believe we should be held responsible for the consequences of the budget neutrality adjustment to account for the payment increases to E/M services. These cuts alone would be devastating, but they could now become crippling to those of us who provide Part B services—including private practices and facilities—that are already struggling from significant economic challenges due to the COVID-19 pandemic.

It is also important to remember that other payers tie their fee schedules directly or indirectly to the MPFS. The majority of our private contracts, as well as the Veterans Health Administration community care, TRICARE, Workers Compensation, and state Medicaid programs reference the MPFS in their payment rates. Therefore, these payment cuts will not only negatively affect Medicare providers and beneficiaries, but also non-Medicare providers and the patients they serve, including veterans, TRICARE enrollees, and commercially insured and self-pay patients.

We are extremely concerned about the cumulative impact of the payment cuts and the PHE leaving us unable to sustain our practices, further slowing economic recovery and restricting Medicare and non-Medicare patients' access to medically necessary services, including the essential hearing, balance, speech, language, swallowing, and cognitive services we provide. According to ASHA, the outcome of the proposed payment changes contradicts Executive Order 13924 (Regulatory Relief to Support Economic Recovery) issued in May, which directs agency heads to rescind, modify, or waive unnecessary regulations that impede economic recovery following the COVID-19 pandemic.¹

Therefore, we strongly urge CMS to use its authority under the PHE to waive the budget neutrality requirement for the new office/outpatient E/M services policy as a means to support economic recovery and increase patient access to medically necessary care during the COVID-19 pandemic.

Thank you for taking the time to consider our perspective as clinicians who provide critical services to Medicare beneficiaries, who ultimately stand to suffer the most from these cuts. We urge you to work with ASHA and other stakeholders to carefully consider all possible strategies to mitigate the far-reaching impact of the cuts, especially during this uncertain and economically challenging time.

Thank you again for the work you have done to improve Medicare coverage during the PHE. We look forward to your continued efforts on behalf of Medicare enrolled providers and the patients we serve.

Sincerely,

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Kristen Janky, NE
Haley Janousek, CO
Katie Janov, NJ
Christine Jardel, CA
Elizabeth Jardine, ME
Gabriela Jatene, MD
Tia Javier, VA
Amanda Jean-Pierre, LA
Anne Jeffreys, PA
Brenna Jeffries, MO
Lisa Jelinek, SD
Suzanne Jennings, WA
Karin Jensen, CO
Marian Jensen, AZ

Terri Jensen, NE
Morgan Jerue, PA
Meagan Jessen, CA
Marie Jette, CO
Shirin Jivanj, TX
Dustie Jobe, OK
Lauren Jodoin, MA
Brent Joe, TX
Angela John, TX
Melissa John, PA
Deborah John, PA
Kelsy John, TX
Meghan Johns, MT
Kristyn Johns, TX
Kelly Johns, OH
Morgan Johnson, AR
Leann Johnson, CO
Rachel Johnson, MN
April Johnson, AL
Rachel Johnson, OK
Patricia Johnson, WI
Valerie Johnson, TN
Alecia Johnson, IN
Cynthia Johnson, NE
Amy Johnson, KY
Carly Johnson, SD
Martha Johnson, TX
Olga Johnson, TX
Paula Johnson, IL
Hannah Johnson, OK
Jelani Johnson, GA
Mandi Johnson, TX
Emaly Johnson, TN
Amy Johnson, OH
Morgan Johnson, TX
Jason Johnson, AR
Scott Johnston, KY
Sandra Johnston, TN
Morgan Johnston, LA
Emily Johnston, AL
Amy Jones, MS
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Alyssa Jones, IN
Jennifer Jones, AL
Amy Jones, NE
Molly Jones, KY
Aaron Jones, MN
Rebecca Jones-Rastelli, PA
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Bethany Jorgensen, MA

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Kimberly Joseph, KY
Arun Joshi, OK
Suzanne Jourdan, CO
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Christine Julian, MI
Jessica Julien, FL
Marco Jurado, TX
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Beckie Kaczmarski, MI
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Katherine Kaiser, IA
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Megan Kane-Mangol, PA
Sophia Kanenwisher, CA
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Katrina Kappen, WV
LynnAnn Kapustka, NE
Renee Karantounis, CO
Amy Karas, MA
Lorelei Karcz Vincent, MN
Tanya Jean Karg, WA
Brittany Karingada, GA
Melissa Karp, CT
Melissa Karp, NC
Gyl Kasewurm, MI
Nina Kashanian, CT
Melissa Kast, GA
Stephanie Kasznel, MO
T. Katz, IL
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Jessica Katzer, NE
Jacqueline Katzev, PA
Alisa Kauffman, PA
Khloe Kaufman, NV
Katelyn Kaufman, KY
Ashley Kaufman, NE
Andrea Kaufman-Gacek, WA
Trescha Kay, WI
sarah kay, OK
Dawn Kearney, SC
Kaycee Keaton, WV
Hannah Kedziorski, NV

Erin Keefer, FL
Meghann Keehner, CA
Briana Keeling, TX
Holly Keeney, AR
Cheyanne Keese, TX
Kim Keessen, MI
kristin kegan, MA
Elizabeth Kehrwald, TX
Clint Keifer, OH
Kelsey Keimig, FL
Daryl Kelehan, IA
Erin Keller, IN
Shelly Keller, AR
Dennis Kelly, OH
Bridget Kelly, SC
Lauren Kelly, IL
Leah Kelly, AL
Morgan Kelly, PA
Margaret Kelly, TX
Jessica Kelly, IN
Ellen Kelsey, AK
Jillian Kemmerly, PA
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Beth Kennedy, WI
Jessie Kennedy, TN
Karen Kennedy, OH
Katherine Kenney, MI
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Marnie Kershner, DC
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Vardush Keshishyan, CA
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Elaina Keth, CA
Tasha Ketphanh, CA
Karen Keung-Chan, NY
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Leah Keylard, WA
Hiba Khan, TX
Maliha Khan, FL
Pinky Khatri, VA
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Alyssa Kiernan, VA
Ann Kiesow, TX
Holly Kiesz-Royer, TN
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Rebecca Killingbeck-Smith, IN

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Suzanne Kimball, OK
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Alison King, VA
Hannah King, MD
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Nichole Kingham, WA
Hanna Kingry, IA
Theresa Kinney, TN
Cheryl Kinney, WI
Erika Kipper, WI
Nicole Kirk, IN
Christine Kirsch, CA
Mindy Kirschner, NJ
Linda Kishtok, FL
Jennifer Kizner, CA
Bernice Klaben, OH
Katherine Klapperich, WI
Linda Klawitter, KY
Lynda Klee, TN
Ilene Klegon, IL
Mildred Klein, FL
Genevieve Klein, CA
Bridget Klein, OH
Richelle Kluck, MO
Micah Klumpp, LA
Amanda Kluzynski, FL
Debra Knapp, NJ
Amanda Knapp, MI
Nancy Kneeland, IN
Debra Kneram, OH
Molly Knigge, WI
Jordan Knight, AL
Scott Knight, AL
Jocelyn Knight, CT
Alyssa Knights, MI
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Laura Knott-Riggall, GA
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Megan Knowles, FL
Alisa Knox, FL
Emily Knudson-Vilaseca, IL
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Mindy Kobara-Mates, IL
Marylyn Koble, TX

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Lindsey Koch, SD
Kristin Koch, VA
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Karen Kockler, IL
Jennifer Koczor, AL
Janet Koehnke, NJ
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Brooke Kohler, OK
Laura Kohlroser, VA
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Noa Kossmann, KS
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Marla Kovatch, PA
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Michele Kramer, OH
Callie Kramer, WI
Susie Kramer, IN
Jill Kramer, OH
Lisa Krasa, VA
Val Kratzer, FL
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Callie Lankford, IN

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Lee Ann Lee, MO
Salvia Lee, IL

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Christy Lee, TX
Natalie Lee, TX
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Welansa Leno, FL
Kristin Lenz, FL
Natalie Lenzen, NE
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Andrea Leonard, TN
Barbara Leonard, AZ
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Darcy Leshner, OH
Erin Leshikar, TX
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Joy Leslie, AZ
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Darcey Lewelling, LA
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Rhonda Line, IN
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Jessica Link, IA
Meri Linscomb, TX
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Brianna Lipke, PA
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Sherri Little, SC
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Courtney Little, VA
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Charles Lively, OK
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Domitille Lochet, FL
Ally Lock, IN
Yael Locke, NJ
Shirley Locke, TX
Melissa Loeffel, IL
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Jessica Loera, TX
Ashley Loether, CO
Lee Ann Lofranco, FL
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Courtney Logan, OH
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Teresa Lomonte, FL
Milodie Long, OR
Cortney Long, AL
Shannon Long, OH
Lindsay Long, PA
Danielle Long, NV

Kate Longenbach, PA
Lauren Longhenry, IL
Elizabeth Lopez, FL
Hassel Lopez, FL
Daniella Lopez, FL
Cheryl Lopez, FL
Megan Lopez, KY
Kathleen Lord, CT
Val Lorenzo, TX
Carolyn Lorimer, TX
Jennifer Lorince, AR
Virginia Lotito, TX
Nicole Louca, NJ
Jennifer Love, GA
Julie Love, NE
Lindsey Lovelady, MO
Nancy Lovering, AK
Tracey Lowe, GA
Allison Lowenberg, NY
Nadia Lucas, PA
Sharon Lucas, MO
Erin Lucey, ME
Katelyn Luczkowiak, PA
Victor Lugo, VA
Jessica Lukasik, ID
Rebecca Lulai, MN
Melisa Lummus, TX
Ann Luna, OH
Mary Luna, IL
Samantha Lundell, WA
Sarah Lundstrom, FL
Jenny Lunkes, SC
Loren Lunsford, CA
Shannon Luongo, NY
Amy Lustig, PA
Sherri Lutz, NC
Jamie Lynch, FL
Rachel Lynch, FL
Danielle Lynch, VA
Laura Lynch, NC
Katherine Lynn, ME
Chrystal Lynn, TN
Molly Lynn, KY
Michelle Lytle, TX
Mary Lytle, UT
Richard Lytton, PA
Chelsea Maag, CA
Edwin Maas, PA
Jenan Maaz, CA
Jobelle Macas, TX
Hilary MacCrae, IL

Shannon MacDonald, NC
Lacey Machemehl, MN
Andrea MacInnes, SC
Lauren MacKenzie, CA
Kathryn Mackinson, TX
Lauren Mackley, MO
Lindsay Macklin, NY
Brittany Macomber, RI
Kelly Macy, VT
Julia Madden, MI
Mary Maddie, TX
Mary Maddock, NC
Kayla Madoff, NJ
Rebecca Madore, OR
Paula Madson, IA
Rachel Magann Faivre, OK
Erin Magee, PA
Mandy Mahalak, MI
Kara Maharay, PA
Julia Mahon, ME
Cara Mahoney, MD
James Mahshie, DC
Alexandra Mai, VA
Sheryl Maier, NY
Kirsten Mains, IN
Carla Maiolin, PA
Carissa Maira, GA
Stephane Maison, MA
Karen Major, FL
Maria Makhina, MD
Megan Makin, MI
Katijo Makin, OH
Christina Makowski, OH
Morgan Malany, MT
Stacy Malavite Pellecchia, PA
Eve Malcolm, IL
Dorinda Malcolm, MD
Donna Mallory, CA
Shannon Malon, MO
Joy Malone, OK
Donna Malsam, CO
Nicole Mammano, NJ
Mckinley Manasco, MS
Darlene Mancini, PA
Dean Mancuso, NJ
Amy Mandaville, TX
Amy Mandlman, MO
Kerry Mandulak, OR
Betsy Manela, FL
Alyssa Manfredi, OK
Rachael Mangiore, MO

Katie Mangus, MI
Marla Mann, GA
Leigh Carrico Mann, NJ
michelle mannebach, MD
Madison Mannel, IA
Kirsten Manning, AZ
Bethany Manning, GA
Pamela Manser, NC
Angela Mansolillo, MA
Jessica Mansur, SC
April Marable, NC
Megan Marble, NV
Gloria Marca, CA
Meagan Marchioni, MS
Courtney Marchman, TN
Kayla Marcinczyk, MA
Elizabeth Marcinkus, MD
Lauren Marcus, NJ
Faye Maretic, CA
Ronda Marfechuk, OK
Faige Margaretten, OH
Sol Marghzar, CA
Maria Del Pilar Mari, CA
Heather Marinello, FL
Jeannine Marmaduke, TX
Melonie Marple, MA
Lori Marra, PA
Janet Marron, MI
Megan Marsh, TX
Ashley Marshall, IN
Alexandra Marshall, ME
Kapri Marshall, NC
Julia Marshall, VA
Cynthia Marstin, VA
Ainsley Martin, NY
Joseph Martin, CA
Jennifer Martin, CO
Kristi Martin, OK
Christine Martin, IL
Kathryn Martin, VA
Wendolyn Martin, CA
Mary Kate Martin, TN
Leslie Martin, CA
Laura Martin, TN
Celestina Martinez, NM
Anastasia Martinez, PA
Valerie Martini, IL
Ann Martino, NJ
Gail Martocello-Flynn, NY
Lena Martone, FL
Lynda Marvin, ME

Pamela Marx, NY
Sarah Marx, MO
Angela Marzelli, IL
Nicole Masciarelli, CT
Pauline Mashima, HI
Monica Mason, SC
Tanya Mason, CO
Lauren Massey, TX
Ana Massiello, PA
Janice Masterson, NY
Amanda Rose Mastropietro, NY
Erika Mathew, MD
Melody Mathews, AL
Brittney Mathias, TX
Valeria-Roberts Matlock, TN
Renee Matlock, FL
Lauren Matsko, VA
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Sandra Matthews, MA
Cari Matthews, OK
Haley Matthias, IN
Abby Mattingly, KY
Mary Mattis, SC
Patricia Mattox-Larson, NH
Deana Mauro, FL
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Therese May, CT
Jennifer Mayer, MA
A. B. Mayfield-Clarke, NC
Roberta Mayhue, FL
Rachel Maynard, OH
Emily Mayne, TN
Geneva Mayne, NY
Kathleen Mays, CO
Sarah Mazeika, PA
Teresa Mazza, OK
Melissa Mazzei-Cooper, PA
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Rachel McArthur, CO
Danila McAsey, IL
Katherine McBride, SC
Nichole McBride, CA
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Devin McCaslin, MI
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Jodi McCollum, AZ
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Shannon McCormick, HI
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Ashley McCoy, MO
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Sarah McDonald, MD
Michelle McDonald, GA
Whitney McDonald, AR
Miranda McDonnell, IL
Tracey McDonnell, CA
Stephanie McDowall, AZ
Julia McDowell, FL
Alysen McElveen, FL
Patrick McEvoy, NY
Teresa McEvoy, NE
Amanda McFadden, IL
Rachel McGee, TX
Allison McGee, SC
Liz McGee Powell, TX
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Donna McGhee, MA
Megann McGill, OR
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Candy McGinnis, WI
Wanda McGinnis, OH
Claire MCGovern, CO
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Karla McGregor, NE
Ciara McGue, FL
Kelli McGuire, OH
Monica McGuire, OK
Mildred McIlwain, FL
Maryrose Mcinerney, NJ
Darcy McInnis, NV
Amanda McInroy, AZ
Rasheda McIntyre, MS
Wanda Mcintyre, MS
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Nicole McKee, NJ
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NE
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Alesa McPhail, OK
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Grace McPherson, TX
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Ellen McSpadden, NJ
Haley McTee, NE
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Amber Mealey, TX
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Kari Medearis, WI
Julia Medford-Natanzon, NJ
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Melanie Meeker, AR
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Sheri Mello, NC
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Randi Melton, FL
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Cynthia Mendoza, AK
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Christina Meyers, GA
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Mandy Mikula, TX
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Ashton Milam, AR
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Adriana Miller, TX
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Michelle Mitchell, MA
Christy Mitchell, OK
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Andrea Moore, KY
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Julie Morris, OK
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Kelsey Morrow, ID
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Victoria Ncube, TX

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Brian Nelson, MO
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Alisson Reber, KY
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Amber Reece, IN
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Meaghan Reed, MA
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Katie Regier, NE
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Andrea Rivera, VA
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Lauren Roberson, FL
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Micah Roberts, OK
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Gary Rodriguez, FL
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Stephanie Rogers, MS
Tracy Rogers, KY

Kathryn Rogers, WI
Patrice Rogstad, WI
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Amber Rolfes, RI
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Casey Roof, KY
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Lauren Rosales, TX
Lushana Rosario, PR
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Kathleen Rose-Le, FL
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Julia Rosin, FL
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Byron Ross, TX
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Shawna Ross, NV
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Natalie Rosselli, OH
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Mona Ryan, OK
Bea Ryan, OK
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Damaris Sanchez Rivera, FL
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Laura Stout, WV
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Elaina Stover, AZ
Heather Strader, SC
Anna Strange, ME
Madeline Strange, WI
Abbey Stratton, WA
Abby Streitz, TX
Elizabeth Strickland, IN
Lindsey Strock Janning, IA
Nathan Strom, FL
Shea Stromberg, GA
Sarah Strong, IN
Kaleigh Stroud, TX
Laura Stroud, OH
Farris Stroupe, OK
Shellie Studdard, AL
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Ashley Stumpf, CO
Alyssa Stumpf, FL
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Terrell Sublett, FL
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Darby Sullivan, FL
Nita Sullivan, UT
James Sullivan, TX
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brennan tavin, SC
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Tempe Thomas, IL
Felicia Thomas, GA
Gina Thomas, IL
Dorothy Thomas, KS
Mackenzie Thomas, TX
Lisa Thomas, VA
Julia Thomas, VA
Dolores Thomas, FL
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Joanne Wisely, PA
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Casiphia Wohlfeld, GA
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Kelly Woodard, WA
Michelle Woods, NJ
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Rhonda Work, FL
Cheyenne Workman, IN
Robin Workman, IN
Rachel Worley, SC
Laura Worthy, SC
Susan Wortman-Jutt, NY
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Charisse Wright, TX
Laima Wright, NY
Marjorie Wright, OK
Samantha Wright, NC
Denise Wright, CA
Abby Wright, IL
Cherry Wright, TX
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Linda Wright, MI
Lauren Wright-Jones, MO
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Tara Wyse, OK
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Sky Yang, CA
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Teresa Young, UT

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Jessica Zerbe, TX
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¹ E.O. 1324 (May 19, 2020). *Executive order. 85. 31353.*

<https://www.federalregister.gov/documents/2020/05/22/2020-11301/regulatory-relief-to-support-economic-recovery>.