

September 14, 2026

Dr. Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Attention: P.O. Box
Baltimore, MD 21244

RE: CY2027 Medicare Physician Fee Schedule Proposed Rule

Dear Administrator Oz:

The undersigned speech-language pathologists (SLPs)—who treat and care for Medicare beneficiaries—appreciate the opportunity to comment on the calendar year (CY) 2027 Medicare Physician Fee Schedule proposed rule.

We respectfully urge the Centers for Medicare & Medicaid Services (CMS) to address three issues before finalizing the rule: the proposed pediatric Healthcare Common Procedure Coding System (HCPCS) code GSLPP, continued access to speech-language pathology treatment through telehealth, and the need for a separate specialty-level impact analysis for speech-language pathology. These issues have important implications for clinical practice, implementation, and Medicare beneficiaries' access to care.

GSLPP Is Not Sufficiently Defined for Implementation

We appreciate CMS' efforts to engage interested parties and respond to concerns about pediatric services. However, GSLPP is poorly and inconsistently defined, relies on an unclear 60-minute treatment assumption, and would create significant confusion and administrative burden for all stakeholders—including clinicians, patients, payers, and electronic health record (EHR) vendors.

The proposed rule does not clearly establish which patients would be eligible for GSLPP. The main discussion describes the code as applying to the pediatric population "up to age 21" while the telehealth discussion refers to patients "up to age 18 or 21." In addition, the *CY 2027 NPRM List of Medicare Telehealth Services* describes GSLPP as "Eval of speech fluency <21" while Addendum B includes no descriptor at all.

CMS does not discuss whether eligibility would end at age 18, 21, or after a patient's 21st birthday. Conflicting definitions could lead to claim denials, compliance concerns, and differing interpretations among clinicians, Medicare contractors, payers, and vendors.

CMS also does not clearly explain how treatment time would affect reporting of the code. Although CMS uses legacy Current Procedural Terminology (CPT) code 92507 as the basis for valuing GSLPP, the proposed descriptor does not include a treatment time in its proposed descriptor, and CMS noted only one unit per patient per day would be

allowed. The proposed rule does not clarify whether it is a timed or untimed code or whether there is a specific amount of time required to report GSLPP.

These uncertainties directly affect whether clinicians can accurately report services, claims will be paid, and patients will have access to medically necessary care. A code with unresolved eligibility and reporting requirements is not ready for implementation.

GSLPP Does Not Reflect Individualized Care

Speech-language pathology treatment must be responsive to each patient's age, diagnosis, medical complexity, treatment goals, and ability to participate. Some patients may not be able to tolerate an hour-long treatment session, while others may require 45, 60, or more minutes of active treatment. In addition, advancements in the understanding of the clinical conditions SLPs treat—such as dementia and autism—as well as changes in technology and service delivery require a coding structure that is flexible and responsive to evolving clinical practice and patient needs.

If CMS intends to make the reporting requirement 60 minutes, medically necessary pediatric services lasting less than one hour may not be reportable. This creates an unnecessary barrier to care for patients who cannot tolerate or do not clinically require a full hour of treatment. If 60 minutes is only a valuation assumption, GSLPP would still provide no way to distinguish among substantially different treatment durations. GSLPP also does not acknowledge differences in time, intensity, and resources involved when providing services across patients, clinical conditions, settings, and stages of care.

A broad, untimed code anchored to 60 minutes would recreate many of the same limitations associated with CPT code 92507. It could result in either overpayment or underpayment, depending on the services provided. It would also make it more difficult for CMS to distinguish changes in clinical practice and patient need from unexplained changes in utilization.

Finally, ensuring the new code family is appropriately structured and valued should be the priority. The development of GSLPP does not achieve this objective. Instead, it would create an overlapping Medicare-specific coding option and add further confusion for clinicians, payers, and vendors preparing for the January 1, 2027, transition.

A Parallel Coding Structure Would Increase Confusion and Administrative Burden

The new speech-language pathology CPT codes will take effect on January 1, 2027. Clinicians, payers, clearinghouses, and EHR vendors are already preparing for this significant transition. Adding GSLPP would create a Medicare-specific requirement for services that overlap with the new CPT codes. Clinicians and billing staff would need to determine which coding structure applies based on the patient's age, payer, treatment focus, treatment duration, and the payer's individual policies.

Medicaid programs and private insurers may also adopt the new CPT codes on different timelines, while some payers may temporarily continue accepting legacy CPT code 92507. Therefore, practices could be required to navigate as many as three coding options for speech-language pathology treatment services—the new CPT codes, GSLPP, and CPT code 92507.

This complexity increases the likelihood of coding errors, claim denials, corrected claims, and delayed payment. Although claims can be corrected and resubmitted, repeated submissions and delayed payments can be costly, particularly for small practices with limited administrative resources. Confusion over the appropriate code could also affect beneficiary financial responsibility and interfere with timely access to care.

Finally, given that this complex proposal will not be finalized until November 2026 for implementation on January 1, we are concerned clearinghouses and EHR vendors will not have enough time to update their coding and billing systems to support accurate claims submission, payer-specific policies, and claims processing edits across a diverse range of payers. This compressed timeline could create widespread confusion, payment delays, and administrative burden for SLPs and practices while also disrupting beneficiaries' access to timely, medically necessary care.

CMS Should Separately Analyze the Impact on Speech-Language Pathology

CMS' specialty-level impact analysis does not separately report speech-language pathology. Instead, speech-language pathology services are combined with physical and occupational therapy. Speech-language pathology, physical therapy, and occupational therapy are different professions with different services, staffing needs, supplies, and costs. Combining them into one estimate makes it difficult for SLPs and practices to prepare by hiding meaningful payment changes and making it difficult to understand how the proposed rule would actually affect our services.

This is especially concerning for 2027, when speech-language pathology practices are already preparing for the replacement of longstanding CPT code 92507, changes to value calculations, lower conversion factors, and varying implementation across payers. Without a separate impact analysis, practices cannot realistically plan for changes that may affect revenue, staffing, contracts, technology, or patient care.

The specialty impact analysis should help providers understand what the proposed changes mean for their own profession. Therefore, we urge CMS to provide a separate, transparent impact analysis for speech-language pathology in the final rule and in future rulemaking.

Ensure Continued Access to Telehealth Services

We are also concerned that the proposed rule does not include the new speech-language pathology treatment CPT codes on the Medicare telehealth services list, while legacy CPT code 92507 remains on the proposed list with a status of "Maintain" and proposed HCPCS code GSLPP has also been included. If the new CPT codes are not added to the final Medicare telehealth services list, Medicare beneficiaries could lose access to critical speech-language pathology services delivered via telehealth when CPT code 92507 is deleted on January 1, 2027.

We respectfully request that CMS crosswalk the new speech-language pathology treatment CPT codes from CPT code 92507, which they are replacing, and include them on the final telehealth services list to ensure Medicare beneficiaries continue to have uninterrupted access to speech-language pathology treatment services via telehealth.

Conclusion

For these reasons, we respectfully request that CMS not finalize proposed HCPCS code GSLPP and instead focus on successful implementation of the new speech-language pathology CPT code family.

We also urge CMS to crosswalk the new speech-language pathology treatment CPT codes from CPT code 92507, which they are replacing, and include them on the final Medicare Telehealth Services List. Without this correction, Medicare beneficiaries could lose access to medically necessary speech-language pathology treatment delivered via telehealth beginning January 1, 2027.

Finally, we ask CMS to provide a separate and transparent specialty-level impact analysis for speech-language pathology in the final rule and in future Medicare Physician Fee Schedule rulemaking.

Thank you for considering these comments and for your continued efforts to support access to high-quality speech-language pathology services for Medicare beneficiaries.

Sincerely,

Petition Signatories

Christine Williams, AK
Elizabeth Torres, AK
Nancy Lovering, AK
Donna Shirnberg, AK
Yvonne San Juan, AK
Anne Ver Hoef, AK
Helen Graves, AK
Taylor Faust, AK
Anna Williams Cochran, AL
Darlene Phillips, AL
Traci Proksa, AL
Patsy Clearman, AL
Melba Acey, AL
Julie Jefferson, AL
Ashley Hill, AL
Tracy Bond, AL
Carolyn Barnes, AL

Regan Houston, AL
Kristi Harbison, AR
Farrell Godwin, AR
Tiffany Cossey, AR
Misty Powell, AR
Mckenzie Smith, AR
Carrie Rone, AR
Brittany Denton, AR
Natalie Welcher, AR
Stephanie Hall, AR
Grace Dickinson, AR
Sara Tingle, AR
Suzanne Garcia, AZ
Jonathan Barsness, AZ
Lindsay Menaugh Stevens, AZ
Sharon Hendrickson-Pfeil, AZ
Robin Rudin, AZ

Tracy Reilly, AZ
Kristin Reeb, AZ
Mary Feusahrens, AZ
Jamie Jeffery, AZ
Carmen White, AZ
Melissa Hurst, AZ
Laquisha Arnold, AZ
Robin Samlan, AZ
Leah Mackie, AZ
Kathleen Mak, AZ
Angela Fox, AZ
Erin Phillips, AZ
Leah Kapa, AZ
Alyssa Rome, CA
andrew Hwang, CA
Jason Tong, CA
Valerie Trexler, CA
Shoshana Stauber, CA
Geraldine Watts, CA
Amy Pirus, CA
Ashley Perez, CA
Madison Gwizdalski, CA
Brenda Baldeon, CA
Bella Panchal, CA
Elizabeth Locy, CA
Gina Costello, CA
Jacqueline Bartholme, CA
JoAnn Silkes, CA
Michelle Laszlo-Rath, CA
Carol Lettko, CA
Janet Convey, CA
Shirley Sigmund, CA
Brandi Quinsay, CA
Christy Slayton, CA
Jessica Gregg, CA
Lindsey Quaiver, CA
Ashley Lopez, CA
Bianca Aguilar, CA
Rosalinda Trejo, CA
Jennifer Kizner, CA

Kelly Arellano, CA
Allison Catalano, CA
Michelle Wahlquist, CA
Sarah Schneider, CA
Chloe Jung, CA
Lisa Rowley, CA
Julie Murphy, CA
Jennifer Martin, CA
Anne Szostek, CA
Courtney Wright, CA
Samantha Ladd, CA
Alicia Gonzalez, CA
Eliza Vasquez, CA
Kaela Murillo, CA
Sarah Bullentini, CA
Mallory Salazar, CA
Teresa Davis, CA
Melissa Ambriz, CA
Kevin McKinnon, CA
Michael Feeser, CA
DrWhitney PhD, CA
Kyliah Ferris, CO
Wendy Dietz, CO
Kimberly Schwarz, CO
Jill Hawks, CO
Sarah Shields, CO
Alysia Peterson, CO
Judith Ludwig-Keller, CO
Jacqueline McCurdy, CO
Jeneine Stevenson, CO
Melanie Martin, CO
Rose Rotter, CO
Allison Gottsch, CO
Sarah Waldorf, CO
Pamela Ramsey, CO
Cheryl Campbell, CO
Amy Frisbie, CO
Tanya Haley, CO
Amy Fetter, CO
Heather Arner, CO

Emily McElyea, CO
Brittany Jansen, CO
Tiffany Hirsch, CO
Gabrielle Lee, CO
Emily Wolkenberg, CO
Katie Ranney-Pepe, CO
Katherine Elkins, CO
Erin Harper, CO
Sarah Foody, CO
Laura Smith, CO
Emma Jackson, CO
Shannon Salazar, CO
Kathryn Price, CO
Claire Carpenter, CO
Lisa Ayers, CO
Patricia Ford, CO
Alexa Herbers, CO
Nicole Bigger, CO
Jenna Hodge, CO
Kallie Renfus, CO
Nicholas Raymond, CO
Brian Elkins, CO
Michele Santino, CT
Sierra Taylor, CT
Jennifer Rucci, CT
Kimberly Williamson, CT
Marcie Charest, CT
Nancy Schaeffer, CT
Caroline Berkovich, CT
Sara Burnham, CT
Michayle Hales, CT
Emma Balancia, CT
Shannon McCabe, CT
Nicole Gallagher, CT
Olivia Cayward, CT
Erica Pirolli, CT
Melissa Katz, CT
Kirsten Balancia, CT
Alexa Balancia, CT
Ashley Hong, CT

Larry Pirone, CT
Jason Taweh, CT
Morgan Foss, CT
Barbara Jean Anderson, DC
Brandlynn Nelson, DC
Julie Verhoff, DE
Kristen Palmer, DE
Teaunah Moulden, DE
Jazmine Winters, DE
Raymond Lust, DE
Laura Caicedo, FL
Elizabeth Murray, FL
Danielle Kassab, FL
Julie Butler, FL
Sabina Cherenfant, FL
Renee Matlock, FL
Alexis Cross, FL
Camryn Wilkerson, FL
Christine Buth Martin, FL
Carolann Hammar, FL
Dee Adams Nikjeh, FL
Tanya Johnson, FL
Crystal Carroll, FL
Marjorie Mathis Smith, FL
Gerrita Morris, FL
Natasha Carby-Joseph, FL
Jeanette Argento, FL
Jillian Caballero, FL
Karen Drake, FL
Brittany Lane, FL
Davida McCovery, FL
Eliana Sobral, FL
Alison Morris, FL
Josephine Kalbaugh, FL
Anleslia Aldous, FL
Lauryn Edel, FL
Emma Metzler, FL
Megan Larson, FL
Lance Pate, FL
Roxana Cruz, FL

Lauren Pree, FL
Janeisy Rodriguez, FL
Jennifer Lallouz, FL
Anjali Singh, FL
Theresa Molthen, FL
Cassandra Fox, FL
Itamar Vega, FL
Laura Medina, FL
Emily Moore, FL
Jimena Kenyon, FL
Margaret Redmond, FL
Melissa Moniz, FL
Anna Underwood, FL
Ryan Hildebrandt, FL
Caroline Bowman, GA
Sucheta Kamath, GA
Margaret Crosby, GA
Amy Aguayo, GA
Deborah Flowers, GA
Katey Outler, GA
Rebecca Waldrop, GA
Anesha Frazer, GA
Heather Crew, GA
Arelice Roman, GA
Marilyn Schorn-Bellows, GA
Bethany Manning, GA
Katherine Edwards, GA
Carissa Maira, GA
Elena Freeman, GA
Marcella Meredith, GA
Charryse Joseph, GA
Sophia Vargas, GA
Dixie Lascelles, GA
Shannon Bragg, GA
Ciara Meadows, GA
Samantha Wilki, GA
Emmy Clark, GA
Aubrie Stevens, GA
Rebecca Wright, GA
Amanda Parker, GA

Jordyn Hazelrig, GA
Jessica Dean, GA
Jessica Dean, GA
Kimberly Yon, GA
Belinda Weir, GA
Amanda Beehler, IA
Megan Russell, IA
Dawn Philbin, IA
Norma Jo Majerus, IA
Cassie Serrata, IA
Presley Jobe, IA
Sheila Sparling, IA
Lauren Semelroth, IA
Alison Lemke, IA
Michael Sharp, IA
Elissa Arbuckle, IA
Katie Husk, IA
Brianne Johnson, ID
Taylor A Richardson, ID
Kathleen Kangas, ID
Laura Rogers, ID
Lauren Tandy, ID
Sondra McMIndes, ID
Chad Judy, ID
Ashley Evensen, ID
Rachelle Bigard, ID
Taelin Holloway, ID
Sheri Elkington, ID
Brianne Banks, ID
Lynley Cazier, ID
Hanah McCabe, ID
Emily Palmer, ID
Anna Jones, ID
Taylor Anderson, ID
William Strong, ID
Linda Miller, ID
Kelsey Tapp, ID
Michelle Coppess, ID
Cala Alexander, ID
Linda Robinson, ID

Sarah Peterson, ID
Kelsey Blue, ID
Hailey Krieger, ID
Anna Bidwell, ID
Cara Boester, IL
Barbara Nathanson, IL
Amanda Feragen, IL
Brittany Nolan, IL
Amara Brown, IL
Zoe Kiemel, IL
Kathleen Franzen, IL
Valerie Heneghan, IL
Amy Perez, IL
Tena McNamara, IL
Paige Wintermute, IL
Ellen Goodwin, IL
Patricia Rom, IL
Lacey Peters, IL
Ashleigh Pierce, IL
Nancy Boldt, IL
Teresa Estrada, IL
Amy Levin, IL
Ilene Klegon, IL
Judith Ball, IL
Barbara Goodson, IL
Kimberly Doerr, IL
Deanna Boianoff Barowski, IL
Carrie Kerr, IL
Laurel Smith, IL
Lily Moen, IL
Jean Sawyer, IL
Rise McElhenney, IL
Tracy Templeton, IL
Mindi Kunz, IL
Jennifer Nix, IL
Sharon Brown-Sweeney, IL
Paula Stone, IL
Michele Simler, IL
Kathleen Fair, IL
Christine Bieniecki-Canada, IL

Audrey Resnick, IL
Debra Ryan, IL
Danielle Pekay, IL
Connie Izquierdo, IL
Stephanie Mulholland, IL
Josephine Friedman, IL
Paula Hamilton, IL
Heidi Verticchio, IL
Sarah Rosten, IL
Karen Kockler, IL
Stacey Buck, IL
Julia Dungan, IL
Joseph Sierra, IL
Bethany Kranich, IL
Jackie Shannon, IL
Sheereen Olsen, IL
Jessica Clement, IL
Karen Cohen-Betman, IL
Kylie Bounds, IL
Abbey Tabor, IL
Emma Ray, IL
Katelyn Rodriguez, IL
Andrea Burie, IL
Shimra Barnett, IL
Mary Smyers-Karaffa, IL
Sydney Ferstein, IL
Karin Eig, IL
Gillian Brend, IL
Sarah Moon, IL
Jansan Davis, IL
Kathleen Post, IL
Tamme Laughlin-Dimitroff, IL
Christine Fletcher, IL
Sheri Wagner Guajardo, IL
Treasyri Williams Wood, IL
Nicole Smith, IL
Kayla Hensley, IL
Lauren Robinet, IL
Tala Yac, IL
Joanna Pacocha, IL

Katherine Stuepfert, IL
Elizabeth Carter, IL
Ciera Lorio, IL
Tiffany Mayberry, IL
Casandra Twaddle, IL
Deanna Anderson, IL
Kari Behrends, IL
Bridget Rohr, IL
Kim Eastburn, IL
Amy Finin, IL
Beth Stuepfert, IL
Sharon Rickert, IL
Daisy Covarrubias, IL
Neha Varma, IL
Elizabeth Nielsen, IL
Erica Larkin, IL
Belinda Taylor-Jones, IL
Claire Fleming, IL
Natalie Kerr, IL
Sarah Sleeter, IL
Samantha Gass, IL
Dyanna Courtney, IL
Edith Armstrong, IL
Valerie Boyer, IL
Vanessa Duncan, IL
Neha Sharma, IL
Sharon Veis, IL
Lacey Peters, IL
Michelle Zeglin, IL
Hannah Cassiday, IL
Jonelyn Langenstein, IL
Renee Rosenberg, IL
Maureen Best, IL
Patricia Boyd, IN
Celestra Dewey, IN
Michelle Gutmann, IN
Dawn Wetzal, IN
Elizabeth Perkl, IN
Teresa Cochran, IN
Whitney Sternberg, IN

Lauren Isabell, IN
Malinda Hibbert, IN
Tara Jones, IN
Emily Hofer, IN
Doug Boyd, IN
Sarah Smith, KS
Derrick Garland, KS
Emireth Monarrez, KS
Jeanne Copeland, KS
Gentry White, KS
Nancy Goodman, KS
Carrie Fratecelli, KS
Meghan Schmitt, KS
Christina Geiger, KS
Lisa Graves, KS
Sarah Hall, KS
Hannah Powell, KS
Rae Sommerville, KS
Maxwell Eastman, KS
Sheryl Anderson, KS
Leah Jellison, KS
Debolina Ghosh, KS
Anne Blandford, KY
Carole Oglesby McMurry, KY
Kate Shaw, KY
Angela Klipper, KY
Sarahanne Maxey, KY
Patricia Hall, KY
Kristy Hampton, KY
Kristen Buchignani, KY
Michelle Raney, KY
Kimberly Swallom, KY
Elyse Miller, KY
Amber Brown, KY
Christina Reynolds, KY
Lynn Bryant, KY
Grace Gingrich, KY
Reba Hall, KY
Stephanie Tompkins, KY
Danielle Fronczak, KY

Jennifer Bailey, KY
Tonya Woods, KY
Ashlyn Hall, LA
Ashley Pilon, LA
Jenifer Juengling-Sudkamp, LA
Morgan Johnston, LA
Brandy Colley, LA
Michaela Accardo, LA
Inez Esparza, LA
Cara Waits, LA
Grace Fary, LA
Kasey Ford, LA
Kasey Ford, LA
Alesia Wall, MA
Ellen Austin, MA
LaVonette Luciano, MA
Janice Buziak-Smith, MA
Jennifer Winston, MA
Kelly O'Connor, MA
Amy Karas, MA
Amy Gebru, MA
Elyse Fishkin, MA
Shriram Ramamurthy, MA
Peter Alexopoulos, MA
Christina Kuss, MA
Kim Theleen, MA
Reinfred Addo, MD
Robbie Robinson, MD
Sharon Khoo, MD
Michele Miller, MD
Sherry Tobin, MD
Diana Desierto, MD
Maria Elena Coloma, MD
Joan Mele-McCarthy, MD
Lauren Campbell, MD
Damien Macon, MD
Judith Blackburn, MD
Joan Ahrens, MD
Megan Miskowski, MD
Jamie Tettey, MD

Lauren Mowbray, MD
Danielle Cooper, MD
Jennifer Asdorian, MD
Lisa Baxter, MD
Doreen Brown, MD
Julia Docking, MD
Amy Wetherill, MD
Sinetra Bowdry, MD
Lindsay Stark, MD
Josh Valentine, MD
Ariel La, MD
Gillian Teran, MD
Lauren Caldwell, MD
Barbara Russell, MD
Stephanie Nixon, MD
Kwadwo Agyekum, MD
Kate Metkus, MD
Alexandria Johnson, MD
Lindsey Pines, MD
Gabriella Carter, MD
Mara Antognoli, MD
Brooke Hatfield, MD
Sarah frank, MD
Lauren Hoffman, MD
Debra M Marvel, MD
Sheri Musil, MD
Katherine Gerber, MD
Jamie Tettey, MD
Charles Kennedy, MD
Patti Caudill, MD
Dionne Estime, MD
Lisa Dymond, MD
Emma Morey, MD
Nina Blanche, MD
Joannie Voilquin, MD
Nancy Hamlin-Ryan, MD
Jelsie Taggert, MD
Kathryn Deetjen, ME
Rudi Klarmann, ME
Kori Mudge, ME

Jenna Johnston, ME
Jesse Austin, ME
Glenn Gagne, ME
Cynthia Gagne, ME
Wendy Goryca-Rooney, MI
Caitlin Ruprecht, MI
Kristin Hicks, MI
Julie Pratt, MI
Glenda Locke, MI
Kyle Teichow, MI
Meghan Vande Water, MI
Ashley Myers, MI
Rachel Englert, MI
Melanie Asman, MI
Emma Spradling, MI
Mackenzie Galbreath, MI
Allison Shattuck, MI
Emily Cunningham, MI
Heidi Banerji, MI
Katie Farr, MI
Kathryn VanderMolen, MI
Mallory Frank, MI
Lindsay Roubinek, MN
Lydia Halligan, MN
Rebecca Lulai, MN
LeeAnn Kyriakides, MN
Abbey Richter, MN
Dana Weise-Brown, MN
Kaye Baumgardner, MN
Wendy Mathiowetz, MN
Katie Eckhoff, MN
Allison Athmann, MN
Amanda Fitzgerald, MN
Benenon Pererva, MN
Lisa Smith, MN
Callie Adams, MN
Jennifer Jensen, MN
Jennifer Engman-Rients, MN
Heather Ketterling, MN
Jennifer Rooney, MN

Sheila Cina, MN
Tessa Rasmussen, MN
Elizabeth Ancel, MN
Haven Schultze, MN
Timothy DeYoung, MN
Bailey Jantsch, MO
Emily Lumma, MO
Madeline Bowen, MO
Loren Finck, MO
Stacy DePriest, MO
Amelia Glass, MO
Renea Franklin, MO
Melissa Black, MO
Laura Randen, MO
Amy Boyt, MO
Sydney Beasley, MO
Kelly Crisp, MO
Courtney Neice, MO
Emily Goodson, MO
Anna Walley, MO
Sandra Przybylski, MO
Mollie Jennings, MO
Lauren Erdman, MO
Katlynn Hecke, MO
Alley Brown, MO
Jordan Ratliff, MO
Ashlyn Johnson, MO
Olivia Dean, MO
Brandy Parr, MO
Pamela Woo, MS
Tracy Casey, MS
Tera Walters, MS
Ruth King, MS
Sara Hammel, MT
Kelsey Storm, MT
Rachel Julian, MT
Kellie Ileto, MT
Karrie Brown, NC
Eliza Hallan, NC
Stephanie Molina, NC

Shanee Fulton, NC
Jacquelyn Sexton, NC
Joanne Puliatti, NC
Kali Deese, NC
Sarah Spencer, NC
Megan Camp, NC
Lynette Sawyer, NC
Caroline Goodson, NC
Shannon Bonnett, NC
Stephanie Fish, NC
Lindsay Webb, NC
Holly Hassler, NC
Crista Misenheimer, NC
Lori Johnson, NC
Tonya Carter, NC
Sharon Everett, NC
Sydney Zafran, NC
Sonja Allison, NC
Debra Porter, NC
Amy Irene Dinno, NC
Kelly DuQue, NC
Amy Kearney, NC
N. Burr, NC
Mariam Abdelaziz, NC
Wendy Oxendine, NC
Mattie Ratliff, NC
Alison Dey, NC
Laura Shumate, NC
Betsy Quilling, NC
Ashlee Withers, NC
Jennifer Isom, NC
Jenna Durham, NC
Jennifer Windham, NC
Stephanie Davis Hart, NC
Natalie Woempner, NC
Christine Thompson, NC
Jennifer Harper, NC
Andrea Dellinger, NC
Anne Vaughan, NC
Elizabeth Fox, NC

Nicole James, NC
Barbara Dymond, NC
Sara Holmes, NC
Savannah Helmer, NC
Katherine Alexander, NC
Amanda Anderson, NC
Rebecca Eaton, NC
Chen Jiang, NC
Charisse Lyons, NC
Erin Stephens, NC
Molly Vaccaro, NC
Ava Moreau, NC
Kim Brown, NC
Helen Kaye, NC
Jasmine Whitby, NC
Dani Shanley, NC
Michael Brothers, NC
Kathryn Longman, NC
Grace Goldston, NC
Jessica Cano, NC
Emily Jordan, NC
Laura Nine, NC
Sarah Villaret, NC
Kayla Flanagan, NC
Susan Cowand-Gray, NC
Judy Buzzi, NC
Kim Turner, NC
Sarah Boyette, NC
Annie Zimmerman, NC
Angela Bennett, NC
Dana Miller, NC
Lifen Zhang, NC
Connie Mendoza, NC
Ashley Williford, NC
Kaya Heath, NC
Lina M Bruges, NC
Ashley Romero, NC
Tristy Carroll, ND
Andrea Landsiedel, ND
Madelynn Behm, ND

MaKayla Heinrich, ND
Carrie Axt, ND
Elizabeth Burton, NE
Mariah Lenz, NE
Leisha Eiten, NE
Gretchen Sundberg, NE
Chelse Krohn, NE
Diane Stittle, NE
Patricia Weseman, NE
Audrey Wise-Carrier, NE
Madison Pass, NE
Hannah Colling, NE
Sierra Ostdiek, NE
Aliviah Gallegos, NE
Yazmin Islas Lopez, NE
Tracey McLaughlin, NH
Amy Rea, NH
Danielle Berlin, NJ
Isabella Beninate, NJ
Mary Anne Ferraioli, NJ
Deborah Grosch-Gaudio, NJ
Siobhan McLaughlin, NJ
Ann Marie Conlon, NJ
Christina Celona, NJ
Janet Krebs, NJ
Karen Berrie, NJ
Sophia Schneiderman, NJ
Karen Kimberlin, NJ
Jill Feldbaum, NJ
Bari Eisenhauer, NJ
Jillian O'Reilly, NJ
Erinmarie Ciallella, NJ
Stefanie Chenkin, NJ
Maureen Tanko, NJ
Courtney Caruso, NJ
Warren Crescenzo, NJ
Amy Whalen, NJ
Linda Tucker-Simpson, NJ
Pamela Jones Smith, NJ
Angela Cultrara Rodrigues, NJ

Debra Holtzman, NJ
Karen Golding-Kushner, NJ
Jacqueline Himmel, NJ
Robynne Kratchman, NJ
Laural Thurston, NJ
Cheryl Kaplan, NJ
Susan Roukema, NJ
Paul D'Imperio, NJ
Rebecca Weber, NJ
Susan Piersa, NJ
Melissa Burnham, NJ
George Marge, NJ
Tracey Weiss, NJ
Eileen Hoffman, NJ
Dalila Da Torre, NJ
Eleanor Tier, NJ
Cecelia Kurland, NJ
Marcia Saltz, NJ
Lauri Greenberg, NJ
Judith Raia, NJ
Christiane Scarpino, NJ
Meryl Baum, NJ
Judith Koebli, NJ
Barbra Kaiser-Seltzer, NJ
Karen Kabaki, NJ
Susan Lesh, NJ
Ellen Handler, NJ
Patrick Walden, NJ
Sarah Snyder, NJ
Shoshana Brody, NJ
Alison Schaefer, NJ
Catherine Pagliaro, NJ
Dolores Watkins, NJ
Benita Fishbein, NJ
Arlene Hernandez, NJ
Stacey Palant, NJ
Casey Bevacqua, NJ
Michelle Czysz, NJ
Jessica Benson, NJ
Phyllis Green, NJ

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Katherine Tappan-Verderosa, NJ
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Jennifer Tonelli, NJ
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Sue Goldman, NJ
Denise Vella, NJ
Permelia McCain, NJ
Angelyz Rodriguez, NJ
Lois Mishkin, NJ
Isabella Sulit, NJ
Alyssa Gossett, NJ
Shanee Gabbay, NJ
Molly Cotugno, NJ
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Anabelen Delgado, NJ
Barbara Goldfarb, NJ
Laura Stanko, NJ
Joyce Bores, NJ
Amber Diego, NM
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Elizabeth Quirk, NM
Michael Campbell, NM
Michelle Garcia, NM
MALIA Vigil, NM
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Nancy Kuhles, NV
Pamela Hanson, NV
Shawna Ross, NV

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Gina Milazzo, NY
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Abbey Zych, NY
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Megan Tobin, NY
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Jordan Walsh, NY
Megan McCann, NY
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Jaclyn Donovan, NY
Wendy Kourounis-Sill, NY
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Tiffany Amsler, OK
Heidi Bonham, OK
Shelby Mills, OK
Teresa Bierig, OK
Shae Wilson, OK
Konya Martin, OK
Xuan Green, OK
Meghan Garrett, OK
Emily Hathaway, OK
Margaret Newton, OK
Amber Epperson, OK
Christy Levine, OK
Theresa Guillory, OK
Lillian Maxey, OK
Hannah Gassaway, OK
Madison McGowan, OK
Kaylee Young, OK
Kaylee Roebuck, OK
Addison Newcomb Newcomb, OK
Michael Humphries, OK
Amanda Lira, OK
Jessica Helm, OK
Christy Lamb, OK
Taryn Ashley, OK
Teigan Beck, OR
Emily Johnson, OR
Sophia Farrier, OR
Jena Leigh Stewart, OR
Angela Bacuyani, OR
Nicole Hinsley, OR
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Jordan Tinsley, OR
Jaime Musgrave, OR

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Graciela Calkins, SC
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Megan Stephens, SC
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Renee Hill, TX
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Alyssa Wade, TX
Debbie Krafcheck, TX
Sofia Tilton, TX
Melisa Lummus, TX
Farzan Irani, TX
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Bailee Jennings, TX
Sherry Sancibrian, TX
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Shea Straw, TX
Miaya Allen, TX
Cathy Torrington Eaton, TX
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Caitlin Terrazas, TX
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Alejandra Carrillo, TX
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Savannah Sparkman, TX
Aaron Anderson, TX
Jordan Justis, TX
Gabrielle Garza, TX
Agnes Polette, TX
Brenda Bender, TX
Stephen Imeh, TX
Lindsey Hardcastle, UT

Pamela Knowles, UT
Janna Voss, UT
Juliette Palmer, UT
Stephanie Berry, UT
Jordan Collum, UT
Amy Buckley, UT
Febbee Icard, UT
Paige Crawley, UT
Jill Sharp, UT
Miranda Small, UT
Marilysa Erickson, UT
Coy Clawson, UT
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Holly Stankosky, UT
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Carin Hadley, UT
Jennfer Newman, UT
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Angela Jo Oman Allred, UT
Eric Dutson, UT
Linda Boyer, UT
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Sarah Chew, VA
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Irene Gutierrez, VA
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Cary Jacob, VA
Maria Galvis, VA
Rachel Johnson, VA
Sydney Miller, VA
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Nichole Lessard, WA
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