

April 10, 2020

The Honorable Jovita Carranza  
Administrator  
U.S. Small Business Administration  
409 3<sup>rd</sup> St SW  
Washington, DC 20416

Dear Administrator Carranza:

On behalf of the undersigned national organizations representing obstetrician-gynecologists and partners dedicated to advancing the health of their patients, thank you for your work to support small businesses, including physician practices, during the COVID-19 global pandemic. While we are starting to realize the short-term implications of COVID-19 on our economy, workforce, and public health, we also must anticipate the long-term impacts of the virus on the financial and physical health of our Nation. As you work to rapidly implement the provisions included in the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Public Law (P.L.) 116-136, and any future policymaking responding to the COVID-19 pandemic, we respectfully request that you consider the unique needs of physician practices.

Physicians are on the frontlines of responding to this public health emergency. Many physicians in private practice are small business owners, operating small and medium-sized clinical practices. Due to the impacts of COVID-19, including recommendations of social distancing, postponing nonurgent outpatient visits and delaying elective surgeries and procedures, many of these small businesses are facing serious financial strain. Our member physicians are confronting difficult financial decisions in an effort to continue serving their patients, including layoffs of office staff, reduced or completely foregoing salary, and even bearing the operating costs of their practices with their own private funds. These temporary solutions are not sustainable and threaten access to care for patients lasting far beyond the current pandemic.

We therefore urge the following considerations as you implement the small business provisions in P.L. 116-136 and any future policymaking responding to the COVID-19 pandemic, so that physician practices are able access these important resources:

- **Ensure that the application process for financial assistance is simple and direct.** During this time of extreme stress on our health care system, it is imperative that programs meant to support small businesses are accessible to those who need them most. A simplified application process, including clear eligibility information, will help to limit the resources diverted from patient care in order to access needed financial support.
- **Prioritize physician practices.** There will undoubtedly be significant demand for finite resources. It is imperative that physician practices have access to this financial assistance to support their continued ability to serve their patients. Support for physician practices is essential to the long-term health of our Nation.
- **Modify the size standards for physician practices for the purposes of participation in support programs.** During this time of unprecedented hardship on our health care system and our Nation's small businesses, including small- and medium-size physician practices, we request that the Small Business Administration (SBA) adjust eligibility standards for physician practices to qualify as a small business. Physician practices of all sizes are struggling financially, and any

monetary or employee limit on eligibility should not apply to physician practices for the purposes of financial assistance from SBA.

Thank you for your consideration of these important priorities to support physician practices and the patients they serve. **If you believe you do not have existing authority to address these concerns, we would appreciate the opportunity to work with you and the Administration to ensure you have the flexibility to address these urgent physician practice needs.** Please contact Rachel Tetlow, ACOG Director of Federal Affairs, at [rtetlow@acog.org](mailto:rtetlow@acog.org) or 585-746-0237, with any questions.

Sincerely,

American College of Obstetricians and Gynecologists  
American Association of Gynecologic Laparoscopists  
American Society for Reproductive Medicine  
American Urogynecologic Society  
Society of Family Planning  
Society of Gynecologic Oncology  
Society of Gynecologic Surgeons  
Society for Maternal-Fetal Medicine