Dear Dr. McClellan:

We are writing to call your attention to a proposed rule, recently issued by CMS, which would make substantial reductions in reimbursement for technologies used to screen for osteoporosis and breast cancer. (CMS-1512-PN, RIN 0938-AO12, Medicare Program; Five-Year Review of Work Relative Value Units Under the Physician Fee Schedule and Proposed Changes to the Practice Expense Methodology)

These cuts to basic preventive services, described more fully below, seem at odds with your commitment to disease prevention, and the "Welcome to Medicare" physical exam which you instituted. In fact, the physical is described in part as "a great way to get up-to-date on important screenings".

We are hoping that you will review these proposed cuts in light of the public health mission of your agency, and withdraw them

Osteoporosis

The "gold standard" for bone mineral density testing is central DXA (axial dual-energy x-ray absorptiometry), the only method recognized by the International Society for Clinical Densitometry and the International Osteoporosis Foundation for the diagnosis of osteoporosis. At least 75% of all bone densitometry screening exams are performed using central DXA.

Despite the fact that screening rates for the Medicare population remain below 25%, CMS proposes to cut reimbursement for central DXA by 75%.

Breast Cancer

To address the problem of missed cancers, academic and industry research groups worked to develop sophisticated computer algorithms to identify features on mammograms that are suspicious for breast cancer. The result was CAD (Computer Aided Detection), which has lead to dramatic increases in the number of cancers detected, and detected at an earlier stage of the disease. Women enjoy improved likelihood of survival and less aggressive treatment options.

Despite the benefits CAD offers women in screening and diagnosis, the proposed rule would cut Medicare reimbursement for CAD by 54%.

Finally, the proposed rule cuts reimbursement for stereotactic guided breast biopsy, a minimally invasive alternative to open surgical biopsies.

Minimally invasive biopsies generally require some form of image guidance, either ultrasound, or stereotactic (x-ray based). Stereotactic is the predominant guidance technology used with vacuum assisted breast biopsy devices, due to device maneuverability and patient positioning requirements. In addition, stereotactic imaging, unlike ultrasound, makes it possible to see micro-calcifications -- sub-centimeter tissue abnormalities -- critical in determining the early presence of breast cancer.

The proposed rule would cut stereotactic guided biopsy by 80%.

We think you will agree that cuts of this magnitude to basic preventive services, as well as a minimally invasive form of breast biopsy, would have the effect of limiting access to critical, life-saving technologies to the women most at risk for osteoporosis and breast cancer. Thank you for your attention to this matter. We look forward to hearing from you.

Sincerely,

_____ _____