

September 16, 2016

Dear Dr. Rosenberg:

The Radiology Business Management Association (RBMA) is an industry-leading organization comprised of more than 2,400 professionals who focus on the business of radiology. On behalf of RBMA, I am reaching out to you today to address disparities among breast cancer screening programs across the country and urge you to assist in closing the gap by **covering and reimbursing for breast tomosynthesis (3D mammography)**.

As you may know, breast tomosynthesis was FDA approved in 2011 and has quickly become the standard of care for many facilities in the United States despite resistance from many payors. To date, there are over 250 peer reviewed publications showing clear and consistent benefits of breast tomosynthesis through both recall rate reduction and increased invasive cancer detection.

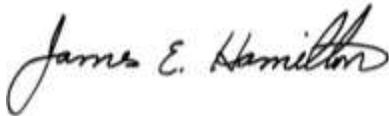
To demonstrate that industry, providers and payors are moving in the direction of coverage and additional reimbursement, we have included a timeline for your review.

- **February 2011: Hologic** breast tomosynthesis is FDA approved
- **December 2013: The American Society of Breast Disease** releases their statement on 3D mammography discussing the improvements in cancer detection and reduction of unnecessary recalls
- **June 2014:** Landmark study on breast tomosynthesis screening is published in **JAMA** (Friedewald)
- **August 2014: GE** breast tomosynthesis is FDA approved
- **November 2014: The American College of Radiology** issues a statement of support for breast tomosynthesis clearly stating that it is not investigational or experimental
- **January 1, 2015: Medicare** begins coverage and reimbursement for breast tomosynthesis
- **January 2015:** Economic data from Truven Health Analytics, Yale and the University of Iowa is published showing a **\$2.4 million cost savings per 1 million members** in a health plan when utilizing breast tomosynthesis and reimbursing an additional \$50
- **April 2015: Siemens** breast tomosynthesis is FDA approved
- **August 2015: HCSC** begins coverage and reimbursement of breast tomosynthesis
- **October 2015: Pennsylvania** governor enacts executive order for breast tomosynthesis to be covered
- **February 2016:** Three years of follow up data on breast tomosynthesis showing breast tomosynthesis screening outcomes are sustainable is published in **JAMA** (McDonald)
- **April 2016: Federal employee benefits** include coverage for breast tomosynthesis
- **July 2016: Illinois** passes state legislation requiring coverage of screening breast tomosynthesis
- **August 2016: NCCN breast cancer screening guidelines** are updated to include breast tomosynthesis and state that breast tomosynthesis should be considered when screening average risk women ages 40 and above
- **August 2016: Cigna** announces breast tomosynthesis coverage and reimbursement for all women, effective immediately
- **August 2016: 56 percent** of women in the country have coverage and reimbursement for breast tomosynthesis through **Medicare, Medicaid and commercial insurance**

Because some patients have insurance with plans offering coverage and reimbursement for breast tomosynthesis and others do not, there is a significant gap in the standardization of care. Patients whose plan does not cover the procedure will have to pay out of pocket or forgo this potentially life-saving test. Breast tomosynthesis is proven both clinically and economically; therefore, we urge you to cover and reimburse breast tomosynthesis for all of your beneficiaries at this time.

RBMA supports this new technology as well as the clinical and economic conversation on this valuable test to improve the health of women. I look forward to your prompt response and reconsideration.

Sincerely,

A handwritten signature in cursive script that reads "James E. Hamilton".

James Hamilton, MHA, CMM, FRBMA
President, RBMA Board of Directors

cc: Craig Samitt, MD, Executive Vice President, Clinical Health Policy and Chief Clinical Officer
John Yao, MD, Vice President of Clinical Pharmacy and Medical Policy