March 3, 2022

The Honorable Mariannette J. Miller Meeks, M.D.
1716 Longworth House Office Building
Washington, DC 20515

The Honorable Mike Kelly
1707 Longworth House Office Building
Washington, DC 20515

The Honorable H. Morgan Griffith
2202 Rayburn House Office Building
Washington, DC 20515

Re: Health Futures Task Force, Modernization Subcomittee Request for Information

Dear Representatives Meeks, Kelly and Griffith and Members of the Health Futures Task Force:

As the leading trade association representing the manufacturers of medical imaging equipment, radiopharmaceuticals, contrast media, and focused ultrasound therapeutic devices, the Medical Imaging & Technology Alliance (MITA) applauds the Healthy Futures Task Force Modernization Subcommittee's efforts to support innovation in the healthcare sector. MITA offers these comments to describe how artificial intelligence (AI) in medical imaging affects healthcare delivery, the cost of healthcare, and the role it plays in healthcare modernization.

Artificial intelligence allows for improved access to high-level care in underserved areas, such as those served by rural hospitals, and can increase the standard of care at the both the community and national level. The American Hospital Association recently highlighted one such example[1] and reported that AI-enabled clinicians were more efficient and encountered fewer administrative barriers to patient care. Medical devices that include AI can be deployed to help physicians make better diagnostic and treatment decisions.

AI imaging tools can improve and may provide additional, new information every step within the radiology workflow, from ordering and scheduling, to image acquisition, to disease diagnosis. These tools support physicians and allow them to make their decisions in an efficient manner and with more information, which leads to better patient outcomes and lower costs.

However, the full benefit AI delivers can only be realized with improvements to existing health policy and regulatory processes within the healthcare sector. One critical component to better AI

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[1] https://www.aha.org/aha-center-health-innovation-market-scan/2020-02-10-leveraging-ai-provide-rural-retail-medicine

is access to data. Healthcare data today is fragmented, often incomplete, and difficult to assess. This limits AI capabilities. Policies that improve healthcare access for underserved communities, encourage broad adoption of healthcare data standards, balance patient privacy needs with public health needs, and consider cybersecurity risks would be a significant step forward and allow for the generation of more complete data sets for AI development and oversight. We recommend policies that improve access to data.

AI-enabled medical devices could substantially reduce healthcare costs. AI-enabled imaging devices could reduce the need for re-scans, decreasing costs to payers and hospitals. AI-enabled imaging devices can identify disease earlier, which has been shown to reduce total healthcare costs to programs like Medicaid[2].

A recent decision by the American Medical Association Digital Medicine Payment Advisory Group provided an AI taxonomy for the CPT code set as a first step towards an AI-inclusive payment structure[3]. More action is needed to ensure the full adoption of AI in healthcare. The existing reimbursement processes established by the Medicare statute are not conducive to the recognition of the use of AI-enabled medical devices. As we look to the continued evolution of our nation's healthcare system to value-based care, it is important to recognize the full potential of AI imaging devices to advance access to healthcare for all while improving patient outcomes and lowering costs. A lack of appropriate reimbursement for the use of AI products is hindering adoption and it will continue to hinder future progress.

Therefore, MITA urges the Modernization Subcommittee to recommend the development of a reimbursement framework by the Centers for Medicare and Medicaid Services as soon as possible. The framework should recognize the costs of AI-enabled medical devices for the purpose of calculating annual Medicare reimbursement amounts. MITA also urges the Subcommittee to propose changes to Medicare reimbursement policies that are transparent, predictable, and accountable, with consistent, clearly stated criteria for AI-based technologies.

It is also imperative that Medicare Processes in this area be nimble and prioritize accurate code development that quickly identifies new technologies as they come to market for appropriate payments. This combination will lift the weight of uncertainty and incentivize the innovation that drives AI development.

With these improvements in the Medicare program, MITA believes that AI will modernize US healthcare at an exponential rate. Providers will reap the benefits of improved workflows. Payers, both private and public, will have a clear and consistent structure. And AI developers will be incentivized to develop safe, effective products that improve patient care and public health.

We look forward to continued engagement with the Healthy Futures Task Force Modernization Subcommittee in pursuit of AI excellence. If you have any questions, please contact Holly Grosholz, Senior Manager, Government Relations at hgrosholz@medicalimaging.org or 703-841-3228.

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[2] https://journals.lww.com/jphmp/Abstract/2021/01000/Breast_Cancer_Population_Screening_Program_Results.10.aspx
[3] https://www.ama-assn.org/system/files/cpt-appendix-s.pdf

Sincerely,

Patrick Hope
Executive Director, MITA

MITA is the collective voice of manufacturers of medical imaging equipment, radiopharmaceuticals, contrast media, and focused ultrasound therapeutic devices. It represents companies whose sales comprise more than 90 percent of the global market for medical imaging innovations. These products include: magnetic resonance imaging (MRI), medical X-Ray equipment, computed tomography (CT) scanners, ultrasound, nuclear imaging, radiopharmaceuticals, and imaging information systems. MITA Member company technologies are an important part of our nation's healthcare infrastructure and are essential for the screening, diagnosis, staging, managing and effectively treating patients with cancer, heart disease, neurological degeneration, and numerous other medical conditions.