



MITA[®]
MEDICAL IMAGING
& TECHNOLOGY ALLIANCE
A DIVISION OF **NEMA**[®]

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May 8, 2020

The Honorable Mitch McConnell
Senate Majority Leader
S - 230, U.S. Capitol
Washington, D.C. 20510

The Honorable Nancy Pelosi
Speaker of the House
H-222, U.S. Capitol
Washington, D.C. 20515

The Honorable Chuck Schumer
Senate Minority Leader
S – 221, U.S. Capitol
Washington, D.C. 20510

The Honorable Kevin McCarthy
House Minority Leader
H – 204, U.S. Capitol
Washington, D.C, 20515

Dear Leader McConnell, Speaker Pelosi, Leader Schumer, and Leader McCarthy:

As the leading trade association representing the manufacturers of medical imaging devices and radiopharmaceuticals, the Medical Imaging and Technology Alliance (MITA) requests Congress provide direct financial support in the next COVID-19 legislative package to healthcare providers to ensure that imaging services are not negatively impacted nor actively reduced because of the pandemic.

The surge of COVID-19 cases has forced many health providers to make difficult decisions about reducing operations, taking pay cuts, and furloughing staff. Experts from the Yale School of Management [are predicting](#) radiology practices and radiology departments could expect volume decreases as high as 70% for the next several months, depending on their state and their ability to provide services with the appropriate level of infection control. Some hospital systems are projecting [losses in the billions](#) as routine health services are cut, and many small practices are [struggling](#) to meet short-term obligations, such as payroll and rent. Even as ‘elective procedures’ are made available again, infection control for imaging services will increase overall costs– putting further stress on available financial resources.

To help alleviate this stress, we support further Congressional authorization of direct focused financial support, grants, and interest-free loans and other mechanisms for health care providers of imaging services, from small physician practices to complete hospital systems, to ensure they can remain business viable. These services are necessary to meet the demands of this crisis and the ongoing health care needs of millions of vulnerable patients across the country. Preserving the capabilities of health care provider infrastructure in the face of an uncertain future with respect to the coronavirus should be an utmost priority. Without Congressional action we fear these providers may not resume their previous levels of normal operation in the immediate term and will need additional cash flows to remain afloat after the pandemic is over. Further, [recent studies](#) have shown a dramatic decline in cancer screenings during the pandemic, especially where medical imaging is used. As a result, many cancers may go undetected and healthcare costs may rise.

The Centers for Medicare and Medicaid Services' (CMS) final Medicare Physician Fee Schedule (MPFS) rule for CY 2020 included broad changes to reduce administrative burden, improve payment rates, and reflect current clinical practice, especially as it relates to evaluation and management services (E/M). We are deeply concerned about the sizable cuts this update will impose and request that budget neutrality provisions for the Medicare payment changes for E/M services be waived. Now is not the time to implement any payment policy changes that will exacerbate the financial instability of healthcare providers' practices.

We have also seen a drastic reduction in nuclear medicine procedures. Even before the pandemic, the nuclear medicine industry was facing significant reimbursement challenges for innovative, precision diagnostic drugs from decisions that hindered patient access at conveniently located healthcare facilities. This had the further effect of limiting the ability of new, more effective diagnostic imaging technologies to penetrate the market. The Centers of Medicare and Medicaid Services (CMS) began a policy "packaging" all diagnostic radiopharmaceuticals in 2008, but the reimbursed rate of the "bundle" is often less than the cost of the innovative diagnostic radiopharmaceutical drug, which results in underpayment. To address this issue, we support the "Medicare Diagnostic Radiopharmaceutical Payment Equity Act of 2019" (H.R. 3772), which would safeguard access to the most appropriate diagnostic radiopharmaceuticals and encourage innovation and development of additional imaging drugs that will be used in the future. Therefore, we urge Congress to include H.R. 3772 in the next COVID-19 legislation to ensure the companies that manufacture radiopharmaceuticals have access to appropriate financial relief.

Thank you for your consideration of our requests and efforts to preserve and protect our nation's healthcare system. Please do not hesitate to contact Andy Dhokai, MITA Senior Director of Government Relations at adhokai@medicalimaging.org (703-841-3247) if we can be of any assistance to these efforts.

Sincerely,



Dennis Durmis
Chairman, MITA Board of Directors
Head of Americas Region, Bayer Radiology
Indianola, PA

MITA is the collective voice of medical imaging equipment and radiopharmaceutical manufacturers, innovators and product developers. It represents companies whose sales comprise more than 90 percent of the global market for medical imaging technology. These technologies include: magnetic resonance imaging (MRI), medical X-Ray equipment, computed tomography (CT) scanners, ultrasound, nuclear imaging, radiopharmaceuticals, radiation therapy equipment, and imaging information systems. Advancements in medical imaging are transforming health care through earlier disease detection, less invasive procedures and more

effective treatments. The industry is extremely important to American healthcare and noted for its continual drive for innovation, fast-as-possible product introduction cycles, complex technologies, and multifaceted supply chains. Individually and collectively, these attributes result in unique concerns as the industry strives toward the goal of providing patients with the safest, most advanced medical imaging currently available.