



2/26/2015



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**Re: Reconfiguration of Nuclear Medicine APCs for Calendar Year 2016**

Dear Dr. Ritter,

The World Molecular Imaging Society (WMIS) appreciates the opportunity to comment on the Society of Nuclear Medicine and Molecular Imaging's (SNMMI) recently submitted letter regarding their proposed reconfiguration of the nuclear medicine APCs for Calendar Year (CY) 2016.

The WMIS is an international scientific and educational organization dedicated to the understanding of biology and medicine through multimodal in vivo imaging and the utilization of quantitative molecular imaging in patient care. WMIS embraces novel molecular imaging science, and promotes the use of creativity, innovation and technology to validate utilization and shepherd new technologies, concepts and applications into mainstream patient care.

During the State of the Union Address on January 30, 2015, President Obama unveiled a \$215 million proposal, *Precision Medicine Initiative: Data Driven Treatments as Unique as Your Own Body* to be included in his fiscal year 2016 budget request to Congress. The purpose of the initiative is to support and foster the goals of precision medicine. Molecular imaging has exhibited tremendous potential to advance precision medicine in many critical human diseases. Unique across all facets of clinical imaging, molecular imaging excels at visualizing and quantifying the cellular and molecular underpinnings of diseases on a patient-by-patient basis. Molecular imaging now provides new ways to detect disease at early, potentially curable stages, identify patients likely to respond to certain treatments, and predict a patient's response to therapy early in the treatment cycle. The widespread utilization

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and growing demands for these innovative molecular imaging techniques are directly attributable to the development and availability of a vast range of specific diagnostic radiopharmaceuticals.

The WMIS would like to express concern regarding the costs of diagnostic radiopharmaceuticals and the current Hospital Outpatient Prospective Payment System (HOPPS) APC structure. We believe these costs may hinder the use or adoption of life-saving molecular imaging procedures and patients would experience restricted access to technologies that could provide earlier detection, identify the most beneficial treatment and determine treatment efficacy early in the treatment cycle. Additionally, we are concerned for future innovation and the advancement of precision medicine in many critical human diseases.

To summarize, in an effort to provide CMS with an option that incorporates packaging as a principle, the WMIS supports SNMMI's letter regarding their proposed reconfiguration of the nuclear medicine APCs for CY 2016, and respectfully requests that CMS create diagnostic radiopharmaceutical APC groups paid separately from the reconfigured nuclear medicine procedure APC groups. The WMIS believes that to do otherwise could adversely affect beneficiary access to medically necessary services and important new technologies.

WMIS appreciates the opportunity to provide these comments and is committed to working with CMS concerning particularly expensive or rarely used procedures that might result in insufficient payments to hospitals. The WMIS looks forward to continuing to work collaboratively with CMS, and would be pleased to provide CMS with any additional information or insight that it may find useful in reaching its final decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Lewis". The signature is fluid and cursive, with a large initial "J" and "L".

Jason Lewis, Ph.D.  
President  
World Molecular Imaging Society