

02-25-10

As you may or may not know the Centers for Medicare and Medicaid Services (CMS) will begin publicly reporting data on four hospital outpatient imaging measures on the Hospital Compare website in June 2010. Included in the imaging measures to be reported is mammography recall rate. Rates for these measures are calculated from claims data submitted to CMS under the hospital outpatient payment system. Hospitals that do not participate in the reporting program will not receive the 2% annual payment update the following year. This is a "done deal" and there is nothing we can do to stop it.

We strongly believe that this is inappropriate for the following reasons:

1. Mammography recall rates by themselves are meaningless and should not be viewed in a vacuum. Recall rates need to be evaluated in the context of other screening benchmarks.
2. Recall rates can vary significantly depending on the screening population (age, risk for breast cancer, availability of prior mammograms, etc.)
3. Comparing recall rates among institutions will not help women make an informed decision as to whether Facility A has a better track record for finding small node negative breast cancers than Facility B.

We urge you to send your objections to making recall rates publicly available to the email address below. Comments are being accepted now through March 18. If we do not voice our objections now, we should not complain after this plan is approved.

Your SBI Executive Committee