

October 22, 2007

The Honorable Max Baucus  
Chairman, Senate Committee on Finance  
United States Senate  
Washington, DC 20510

The Honorable Charles Grassley  
Ranking Member, Senate Committee on Finance  
United States Senate  
Washington, DC 20510

Dear Chairman Baucus and Ranking Member Grassley,

On behalf of the undersigned groups, we wish to bring an important issue to your attention as you develop a Medicare package this year. We understand that your Committee may be developing comprehensive policy to ensure appropriate use of Medicare imaging services. As you do this, we would like to point out the many clear differences between ultrasound and more advanced imaging modalities, and urge you to exempt ultrasound from any new Congressional Medicare imaging proposals.

Ultrasound is very different from advanced imaging modalities, including MRI, CT, PET, and nuclear cardiology. Ultrasound's clinical appropriateness is well established in medicine; its growth rate is moderate; its safety record is proven; and many physician specialties are carefully trained in its use beginning in residency. Innovations in ultrasound today are not in developing new areas of use and growth, but in continuing to use ultrasound in providing quality patient care.

In recognition of these differences, we urge you to exclude ultrasound from any proposals that would add accreditation, privileging, or additional administrative or reporting requirements on physicians or their facilities that use ultrasound. These approaches may be appropriate for advanced and still growing imaging modalities, but not for ultrasound.

Thank you for your consideration of these important concerns. We look forward to working with you to ensure that Medicare beneficiaries continue to receive safe, high-quality care. Should you have any questions, please contact Tara Straw at the American College of Obstetricians and Gynecologists at [tstraw@acog.org](mailto:tstraw@acog.org) or 202-863-2512.

Sincerely,

American Academy of Family Physicians  
American Academy of Ophthalmology  
American College of Emergency Physicians  
American College of Obstetricians and Gynecologists  
American Society of Breast Surgeons  
American Urological Association  
Society of Gynecologic Oncologists

Cc: Members of the Senate Committee on Finance

## ULTRASOUND IS CRITICAL IN PROVIDING TIMELY & NECESSARY CARE

*Many physicians are trained in residency and tested through board certification and maintenance of certification on the ultrasound techniques that are most appropriate for their specialties. Here are a few examples of the uses of ultrasound.*

- Ultrasound imaging in clinical practice **enables faster diagnosis of breast cancer**. Using ultrasound guidance, a breast surgeon can perform a minimally invasive breast biopsy and determine whether the lump is cancerous in a matter of days. Previously, a surgeon had to do an open biopsy and the patient waited as long as 10 days to learn the result. The use of image-guided breast biopsies saved the Medicare program as much as \$88 million between 2001 and 2003, compared to the cost of performing open biopsies. [Lewin Group]
- **Ophthalmologists use ultrasound to diagnose of a wide variety of ophthalmic diseases** and conditions including glaucoma progression, interocular tumors, vitreoretinal, choroidal, and posterior segment issues. Ophthalmologists also use imaging to determine the axial length of the intraocular lens prior to cataract surgery. In particular, the migration of ultrasound from the hospital into less expensive health care settings has advanced the treatment of age-related macular degeneration (AMD) and diabetic retinopathy. With the use of ultrasound and new drug therapies, 85 percent of AMD patients can have their sight loss stabilized whereas previously all of them lost their eyesight.
- Continuous ultrasound guidance **improves the safety of third-trimester amniocentesis** and reduces costly complications. In one study, ultrasound guidance helped achieve a 99% success rate, considerably higher than the 87% success of the procedure in previous studies without using ultrasound guidance. [Obst & Gynec 1999. 99( 2). 255-259] Prior to ultrasound guidance, complications were common and often serious, including premature rupture of membranes, infection, maternal hemorrhage, fetal or placental hemorrhage, fetal distress and fetal injuries.
- Ultrasound is a critical diagnostic tool for emergency physicians and is especially useful in diagnosing and treating ectopic pregnancy, thoracic and abdominal traumas, cardiac activity, liver and renal diseases, as well as making invasive medical procedures safer. Point of care evaluation of torso trauma resulted in decreased mortality and reduced inpatient length of stay. A conservative estimate of the **resulting savings is \$569 million per 100,000 patients**. [Acad Emerg Med 2000. 7. 501]
- Renal ultrasound in the office is commonly performed in patients with hematuria to assess for a renal mass (kidney cancer). If the ultrasound is negative, it can often save the cost of more expensive imaging. It also **accelerates patient care, speeding the time to diagnosis and treatment** and possibly saving lives.