



November 24, 2020

Cigna  
David Cordani, MBA, President and CEO  
Steve Miller, MD, MBA Chief Clinical Officer  
900 Cottage Grove Road  
Bloomfield, CT 06002

Dear Mr. Cordani and Dr. Miller:

RE:     Revise the Site of Care: High-tech Radiology Medical Coverage Policy

As organizations dedicated to improving pediatric care through imaging, we write to express our significant concerns with Cigna's announcement of implementation of the Medical Coverage Policy: "Site of Care: High Technology Radiology," particularly directing children 10 years of age and older away from a hospital-based imaging department or facility. We believe this new policy will have a profoundly negative impact on the quality and safety of pediatric care for children and adolescents undergoing advanced outpatient imaging studies. We urge Cigna to expand its medically necessary criteria to include children up to 19 years of age to have high-tech imaging procedures performed and monitored at sites with appropriate pediatric imaging expertise, including hospital-based imaging.

Under this Cigna policy, pediatric patients older than 10 years of age will be directed away from hospital-based imaging centers that are commonly staffed with pediatric specialists. This includes specialized pediatric radiologists, who are the most experienced physicians for monitoring and interpreting these advanced imaging studies, as well as the technologists and nurses who are specially trained to interact with and perform diagnostic CT and Magnetic Resonance (MR) examinations for the pediatric population. The cut-off of 10 years old is artificial and many diseases of childhood extend into adolescence. Therefore, we urge Cigna to change its policy and include children up to age 19 years for non-emergent high-tech imaging procedures. This change would align with the imaging policy of another national health plan. We request the opportunity to engage with Cigna regarding the best path forward to ensure excellent care for pediatric patients balanced with the need to be sensitive to cost factors.

A basic premise of pediatric and pediatric subspecialty health care is that children and adolescents are not small adults. Their anatomy, physiology, risks from exposure to ionizing radiation and contrast, and diseases are fundamentally different from those seen in adults. Therefore, to safely and effectively image children, pediatric-specific protocols must be utilized, as outlined in the attachment.

We strongly believe that pediatric specialists make a substantial difference in safety, accurate clinical decision-making, and, most importantly, improved outcomes for the pediatric patient. Pediatric radiologists reliably provide accurate interpretations of advanced imaging studies and eliminate unnecessary or inappropriate further imaging studies.

Those not as familiar with pediatric imaging findings may recommend more, potentially unnecessary/inappropriate follow-up imaging examinations. Additional imaging will not only increase health care cost but also will expose the pediatric patients to unnecessary studies and, in the case of CT scans, increased exposure to radiation.<sup>1,2</sup> Referring pediatric providers depend on pediatric imaging specialists for accurate, actionable reports, clarity in recommendations, and accessibility for consultations in difficult situations.

In summary, this letter is in objection to the Cigna Medical Coverage Policy, "Site of Care: High-tech Radiology," and calls for the immediate implementation of the recommended changes to expand its medically necessary criteria to include children up to 19 years of age to have high-tech imaging procedures inclusive of imaging facilities where pediatric specialists are available. Economic steering of pediatric patients, disregarding their optimal care, is neither appropriate nor in the patient's best interest.

If you have questions, need additional information, or would like to arrange a follow up discussion with subject matter experts, please contact Kathryn Keysor, Senior Director, Economic Policy at (571) 428-8799 or [kkeysor@acr.org](mailto:kkeysor@acr.org).

Sincerely,



Christopher I. Cassady, MD,  
FAAP  
Chair, Board of Directors  
Society for Pediatric Radiology



Howard B. Fleishon, MD, MMM,  
FACR  
Chair, Board of Chancellors  
American College of Radiology

Attachments:

- Cigna Medical Coverage Policy 0550- Site of Care: High-Tech Radiology

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<sup>1</sup> Rostad BS, Applegate KE, Kim T, Mansour RM, Milla SS. Multiphase acquisitions in pediatric abdominal-pelvic CT are a common practice and contribute to unnecessary radiation dose. *Pediatr Radiol*. 2018;48(12):1714-1723.

<sup>2</sup> Goske MJ, Applegate KE, Bulas D, et al. Image Gently: progress and challenges in CT education and advocacy. *Pediatr Radiol*. 2011;41(Suppl 2):461-466.