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January 28, 2018

Craig Samitt, MD
EVP & Chief Clinical Officer
Anthem, Inc.
120 Monument Circle
Indianapolis, IN 43204

Dear Dr. Samitt:

On behalf of the Society for Participatory Medicine, we urge Anthem to retract or revise their policy entitled "Imaging Clinical Site of Care." The policy is currently issued in nine states (Indiana, Kentucky, Missouri, Wisconsin, Colorado, Georgia, Nevada, New York and Ohio) and is set to be implemented in California, Connecticut, Maine and Virginia this year. This policy requires prior authorization for MRI or CT scans performed on patients in the hospital setting, and Anthem can deny coverage for patients if the insurance company determines the scan should be completed at an outside facility.

At the Society for Participatory Medicine we firmly believe that partnerships between providers and patients are essential to optimize health care outcomes. Our guiding principles include encouraging patients and caregivers to be actively involved in their health care decisions and encouraging mutual collaboration among health care professionals. We believe this policy will interfere with patients', physicians', and their radiologist partners' ability to collaborate and engage in the health care decision-making process.

We applaud your organization for proactively seeking to control costs, and we know that there is much work to be done in slowing down cost growth, and that new and innovative solutions will be required. However, we are concerned that in this case, your approach is ill-advised. Patients know what is best for their own health and financial situation, and this policy ignores patients' unique situations. Each patient is different, and all health care referrals must be tailored to a patient's needs for the best health care outcomes.

Injecting insurance payers into the medical decision-making process will damage the physician-patient relationship. This relationship is vital to beneficial health outcomes and longstanding relationships, which are necessary to establish trust between the patient and the provider determining their health care. By removing advanced imaging from hospital settings and moving it exclusively to freestanding imaging centers, Anthem is using the threat of non-reimbursement to take decision-making ability away from physicians and their patients. While

cost is one factor to consider when establishing regulations, it cannot be the only factor. Physician recommendations often consider aspects of patient care that outside benefit management firms cannot possibly understand. The physician-patient relationship is a bedrock of medical practice. All policies must revolve around this concept and do all they can to strengthen and maintain this relationship.

Most importantly, we believe that patients should be the drivers of their health care decisions. Patients can only make informed and adequate health care decisions when they have knowledge of the process and access to all possible options. This policy takes choice away from the patient, severely limiting his or her ability to make the right decision at the appropriate time. This policy removes an entire site of care from the equation. This will lead to fragmented care and potentially poor outcomes and added costs for patients and providers in the long term. Everyone in the health care industry, including payors, should strive to engage and empower patients, collaboratively working together on policies that put the patient at the center.

We encourage you to reevaluate this policy and instead bring patients to the table to help determine the best ways to bring costs down for your customers. The Society for Participatory Medicine would welcome ongoing discussions and is open to facilitating discussions between our members and your company leadership.

It is crucial that all stakeholders — including patients and the organizations that represent them — have a seat at the table of this negotiation. Together we can find a solution that works best for all parties involved.

Sincerely,

The Society for Participatory Medicine Board of Directors

By _____

Joseph Ternullo, Vice Chair