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Date: October 11, 2015

To: Joe Hilbert  
Director of Government & Regulatory Affairs, Virginia Department of Health

From: Richard A. Szucs, MD  
Chair, Legislative Committee  
Virginia Chapter, American College of Radiology

Re: COPN Comments

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There are certain things that COPN does with regard to high cost imaging including CT and MRI, that are important. These include controlling utilization, ensuring some measure of quality, assisting in the fiscal health of hospital systems and academic medical centers and requiring shared provision of charity care.

If COPN is reformed or eliminated with regard to imaging there are certain things that we feel must be addressed and these include the following:

Maintenance of quality must be ensured. Quality of imaging examinations has several components. The quality of the imaging equipment can be maintained through requirements for licensure and inspection. The quality of performance of examinations can be addressed by requiring accreditation of facilities (ACR accreditation or equivalent). The quality of interpretation of exams can also be addressed through accreditation or credentialing of providers.

Utilization needs to be appropriate. Utilization will increase with increased numbers of scanners and increased capacity particularly in physician's offices. There needs to be a mechanism to prevent increased utilization that does not improve patient and population health outcomes. The United States already spends far more than any other country on healthcare without better outcomes. Use of appropriateness criteria can help to prevent inappropriate examinations. There are existing programs to do this such as ACR Select from Clinical Decision Support.

Finally, there must be adequate access for charity patients and requirements for equitable participation in provision of charity care with monitoring and oversight to ensure that the requirements are being met. Providers must not be permitted to cherry pick paying patients and dump charity care on the hospitals and academic medical centers.

Respectfully submitted,



Richard A. Szucs, MD  
Chair, Legislative Committee  
Virginia Chapter, American College of Radiology