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**Phyllis Greenberger, MSW**  
President and CEO  
Society for Women's Health Research  
Washington, D.C.

October 15, 2015

Glenn C. McGuirk,  
Center for Medicare, Division of Ambulatory  
Services,  
Centers for Medicare & Medicaid Services (CMS)  
7500 Security Boulevard  
Mail Stop C4-01-26  
Baltimore, MD 21244

Dear Mr. McGuirk and CMS Staff,

On behalf of the Society for Women's Health Research (SWHR®), we are writing to express our concerns regarding proposed cuts to the reimbursement for a number of molecular diagnostic tests. SWHR, a national non-profit based in Washington D.C. is widely recognized as the thought-leader in promoting research on biological differences in disease. We are dedicated to transforming women's health through science, advocacy, and education.

The Centers for Medicare & Medicaid Services (CMS) Preliminary Determinations for new test codes on the clinical laboratory fee schedule for 2016 proposes drastic cuts, (30%-90%), to existing Medicare payment rates for certain tests. These tests provide physicians with specific information for diagnosis and managing the care of patients with complex conditions that have disproportionately broad impact on women, such as cancer, cardiovascular disease, and rheumatoid arthritis.

SWHR is concerned that the proposed cuts will have significant impact on patient care if they are finalized. Over the last decade, tremendous advancements have been made in our knowledge of how diseases and illnesses impact women differently, disproportionately or exclusively from men. Through research and innovation in personalized medicine, scientists have developed



cutting- edge diagnostic tools and technologies that expedite health care decisions and improve patient care. Having access to these new technologies is critical to advancing care for patients and their providers and towards achieving better quality outcomes.

SWHR strongly believes that patients, particularly women, should have access to molecular diagnostic tools that enable them to make informed decisions about their health through noninvasive tests. Patients expect innovative approaches to disease management, innovative care that cannot be provided if reimbursement rates are not sufficient to support the use of these important tests. **We urge CMS to issue final payment determinations that would lead to continued use of the existing Medicare payment rates.**

We hope CMS will take our recommendations into consideration when making its final determinations. If you have any questions, please contact Leslie Ritter, Vice President Public Policy at SWHR at [Leslie@swhr.org](mailto:Leslie@swhr.org) or 202-496-5003.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Phyllis Greenberger".

Phyllis Greenberger, MSW  
President & CEO  
SWHR