

# *The Pennsylvania Radiological Society*

Teresa D. Miller, Commissioner  
Pennsylvania Insurance Department  
1326 Strawberry Square  
Harrisburg, PA 17120

Subject: Balanced Billing comments from the Pennsylvania Radiological Society

March 4, 2016

Dear Commissioner Miller,

The Pennsylvania Radiological Society (PRS) would like to thank you in advance for considering our comments on the Pennsylvania Insurance Department's (PID) proposal to prevent balanced billing of patients for medical services performed out-of-network (OON). There are many factors involved in this "surprise" balanced billing issue. While the PRS agrees that OON balanced billing issues are a problem for patients, we strongly feel that this is not an issue which can be solely resolved by requiring OON physicians to accept payment based on in network contractual agreements. While the patients should not be caught in the middle, much of the responsibility lies within the insurance industry. The problems of inadequate or narrow networks, the lack of transparency regarding the limitations of coverage of insurance products sold to patients, and unfair contracting practices of insurance companies, many of which dominate a particular market, are frequently the cause of "surprise" OON billing.

The PRS is concerned about the resulting loss of the ability of private practice physicians in all specialties to engage insurers in fair and balanced contract negotiations. With this proposal, there would be no incentive for any such negotiation on the part of the insurance companies. While this proposal may have the greatest impact on private practice physicians with contracts with large in-network facilities such as hospitals, it will affect all private practice physicians. If these physicians are unable to participate in fair negotiations, the only option may be to discontinue providing coverage for hospitals and emergency services. This would result in even narrower networks, which could potentially impact patient access to subspecialty care, particularly in rural areas.

The PRS will have a representative participating on the physician Task Force created by PAMED. We are looking forward to working with the PID to develop a fair solution which addresses both the patient and physician concerns.

Please contact our office if you have any questions. Our Executive Director, John Kline can provide further information if needed.

Respectfully,

Beverly G. Coleman, M.D., FACR  
President  
Pennsylvania Radiological Society