

From: [REDACTED]
To: [ETF SMB Board Feedback](#)
Subject: Coverage for Mammograms
Date: Thursday, May 25, 2023 1:46:10 PM

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Dear Board,

I am writing to ask you to review your policy on which age mammograms screening is covered as preventative services. [The federal recommendation published in 2016](#) recommend women with a family history begin screening at age 40. I was told by Group Health Care of Eau Claire that even with a doctor's note documenting family history, they are unable to cover this as preventative because of the agreement with ETF. Please note that there is a [draft recommendation](#) published May 9, 2023 that once again shifts the recommendation to screening all women at age 40. I also want to draw your attention to some contradictory information that I receive as an employee. I receive Wellness Newsletters from my campus that urge us to participate in screening for breast cancer beginning at age 40 and then I find out that our insurance doesn't consider the screening preventative. I

I would appreciate communication about the board's willingness to review the policy and make revisions.

Sincerely,
Amber Garbe
Assistant Professor
UW-Stevens Point



STATE OF WISCONSIN
Department of Employee Trust Funds
A. John Voelker
SECRETARY

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June 12, 2023

Amber Garbe
[REDACTED]

Dear Amber Garbe:

Thank you for your email about mammogram coverage for women in their 40s.

As part of our annual review, the Department of Employee Trust Funds (ETF) analyzes changes made to federal and state laws that may impact coverage provided by the Group Health Insurance Program (GHIP). We have finished our review of services for the coming 2024 plan year and presented our findings to the Group Insurance Board (Board) at the May 17, 2023, Board meeting. ETF is limited under Wisconsin State Law as to which services can be added to the GHIP without a legal mandate. Specifically, we cannot add any services to the GHIP without proving that those services would reduce costs due to improved health, or without reducing coverage in some other part of the program to cover the costs of the new services.

ETF covers mammograms as required by the Affordable Care Act (ACA), which states health plans must cover services that receive an A or B grade from the United States Preventive Services Task Force (USPSTF) with no cost-sharing for members. The [USPSTF](#) gives a "B" grade for the effectiveness of mammograms for women aged 50 to 74, so these services are covered with no cost-sharing for members. Until recently, screenings in women aged 40 to 49 had a "C" grade, and USPSTF notes that the decision to screen "should be an individual one." The service will be covered by the health plans but may be subject to cost-sharing.

ETF is aware of the draft recommendation published on May 9, 2023, by the USPSTF regarding coverage of mammograms starting at age 40. We are currently discussing this recommendation with all health plans within the GHIP to review and standardize coverage for mammograms. There is also a court case pending regarding coverage of preventive services under the ACA. If the courts uphold the preventive services provision in the ACA, ETF will expect all plans to adopt the new USPSTF recommendation starting January 1, 2024.

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If you feel that a medically necessary procedure has been denied by your plan, you have a right to file a grievance of the coverage determination. You can contact your health plan to begin the grievance process. ETF has Ombudsperson staff available to help you through that process. You can contact them by calling (608) 261-7947 or by email at ETFSMBOmbudsperson@etf.wi.gov.

Again, thank you for your email. If you have any other questions, comments, or concerns, please do not hesitate to contact me using the information below.

Sincerely,

Luis Caracas, Health Plan Policy Advisor
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608-261-0720