

January 6, 2026

Dear Members of the PRMR Clinician Committee,

Thank you for the opportunity to comment on the Rate of Timely Follow-up on Abnormal Screening Mammograms for Breast Cancer Detection measure under consideration (MUC2025-042) for the Merit-Based Incentive Payment System.

HealthyWomen is the nation's leading organization focused on educating and empowering women in midlife — ages 35 to 64 — so they can make informed healthcare decisions, advocate for themselves, and prioritize their health and wellness. For over 30 years, this mission has steered our educational and policy programming toward initiatives that elevate the lived experiences and needs of women, raise awareness of conditions that differently and disproportionately affect women, and highlight opportunities to close gaps in women's care. That's why we are writing to express our support for MUC2025-042 and encourage its adoption.

Breast cancer is a leading cause of death for women in the United States, accounting for approximately 30% of all new female cancers annually.¹ Fortunately, early detection and treatment is very effective, with the five-year relative survival rate of breast cancer when found early and in the localized stage sitting at 99%.² Timely follow up to abnormal screening mammograms plays a crucial role in ensuring early detection and treatment. However, it is estimated that up to 30% of women do not receive recommended immediate follow-up for high-risk mammograms, with women of color facing the longest delays, and all patients affected by delayed care facing an increased risk for worse outcomes and reduced survival rates.³

Therefore, increased rates of timely access to follow-up from an abnormal screening mammogram represent an important opportunity for improved breast cancer care and outcomes. We believe adoption of MUC2025-042 can serve as a meaningful step toward this goal and the Administration's stated goal of disease prevention by promoting early detection and intervention.

HealthyWomen applauds CMS for considering MUC2025-042 and respectfully urges CMS to adopt this measure to improve the future of breast cancer morbidity and mortality in the U.S. and more broadly, advance women's health.

Sincerely,

A handwritten signature in black ink that reads "Beth Battaglino". The signature is written in a cursive, slightly slanted style.

Beth Battaglino, RN-C
CEO, HealthyWomen

Endnotes

1. “Breast Cancer Statistics | How Common Is Breast Cancer?” Accessed December 23, 2025.
<https://www.cancer.org/cancer/types/breast-cancer/about/how-common-is-breast-cancer.html>.
2. “Follow-Up After Abnormal Mammogram Assessment (FMA-E).” *NCQA*, n.d. Accessed December 23, 2025.
<https://www.ncqa.org/report-cards/health-plans/state-of-health-care-quality-report/follow-up-after-abnormal-mammogram-assessment-fma-e/>.
3. “Survival Rates for Breast Cancer.” Accessed December 23, 2025.
<https://www.cancer.org/cancer/types/breast-cancer/understanding-a-breast-cancer-diagnosis/breast-cancer-survival-rates.html>.