



April 1, 2020

Hon. Raymond G. Farmer  
President  
National Association of Insurance Commissioners  
1201 Main St., Suite 1000  
Columbia, SC 29201

Dear Director Farmer:

The Radiology Business Management Association (RBMA) is an industry-leading organization comprised of more than 2,100 professionals who focus on medical imaging. RBMA members support diagnostic imaging, interventional radiology, and radiation oncology providers in the full spectrum of practice settings that include hospital, outpatient and academic settings.

As your office considers regulatory directives and orders in this time of the COVID-19 emergency we ask that you consider a suspension of all health insurance payer "timely filing" requirements applied to insurance payer and physician practice agreements. With the growing crisis, the new remote work environment for both health care providers and payers, and the growing challenge to timely process payments within a remote or limited workforce environment, it may be increasingly difficult and critical for insurance payers to relax the language in physician practice agreements on the timely submission of claims.

The physician practice community is accustomed to meeting timely filing requirements. Currently, RBMA data indicates that physician practices are required to submit claims within a 90-180-day timeframe to be considered timely. As we move through this period of national emergency this timeframe will become more difficult. Physician practices should not be penalized. RBMA is currently tracking radiology practice revenues and data indicates a reduction of nearly 60% nationwide with the suspension of non-essential medical procedures and imaging.

We would ask that, as an Insurance Commissioner directive, payers should suspend the initial claim and appeal timely filing provisions. This directive would remain in effect until all Covid-19 related emergency declarations are lifted by federal and state officials.

We are all partners as we endeavor into uncharted waters and, like you, we are committed to serving our communities when they need us most.

Thank you for your consideration. If your office would like to discuss specific issues related to patient and insurance needs during this crisis, please feel free to contact me and I will connect you with experts to help guide your policies. [Bob.still@rbma.org](mailto:Bob.still@rbma.org): 717.475.6079.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert T. Still', written in a cursive style.

Robert T. Still  
Executive Director

Cc: State Insurance Commissioners