

December 7, 2020

James Kiley, M.D.  
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Blue Shield of California  
Medical Care Solutions  
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Rancho Cordova, CA 95670  
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**RE: DRAFT Radiation Oncology Medical Policy Frequently Asked Questions for providers**

Dear Dr. Kiley:

The American Society for Radiation Oncology (ASTRO)<sup>1</sup> appreciates Blue Shield of California's willingness to discuss its Radiation Oncology Medical Policy with us. However, we are concerned that the "Draft Radiation Oncology Medical Policy Frequently Asked Questions for providers" (the "Policy") implies that ASTRO approved the Policy and/or assisted with drafting it. While we recognize the changes that Blue Shield of California have made to the Policy based upon our feedback, ASTRO still has several major concerns about the Policy's limited coverage for radiation therapy services which prevents us from endorsing it at this time. For example, the Radiation Oncology Medical Policy does not cover verification simulations, an important safety check that prevents excess exposure of the patient's healthy organs to radiation. The Policy also greatly restricts the number of basic dosimetry calculations and treatment devices allowed per course of treatment, both of which are crucial to treatment efficacy and patient safety.

Several ASTRO members have expressed their concerns after being told by claim reviewers that ASTRO approved the Policy. While we remain open to working with you to provide feedback, until we are able to endorse the Policy, ASTRO urges you to immediately update the Frequently Asked Questions introductory paragraph and FAQ section #13 on page five of the Policy by removing any reference to ASTRO. This will clarify that ASTRO has not given approval of the Policy.

Should you have any questions, please contact Jessica Adams, Health Policy Analyst, at (703) 839-7396 or via email at [Jessica.Adams@astro.org](mailto:Jessica.Adams@astro.org).

Respectfully,



Laura I. Thevenot  
Chief Executive Officer

CC: Lori Shoaf, Executive Director, Political and External Affairs, Blue Cross Blue Shield Association

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<sup>1</sup> *ASTRO members are medical professionals, who practice at hospitals and cancer treatment centers in the United States and around the globe and make up the radiation therapy treatment teams that are critical in the fight against cancer. These teams often include radiation oncologists, medical physicists, medical dosimetrists, radiation therapists, oncology nurses, nutritionists and social workers, and treat more than one million cancer patients each year. We believe this multi-disciplinary membership makes us uniquely qualified to provide input on the inherently complex issues related to Medicare payment policy and coding for radiation oncology services.*