

November 7, 2019

Virginia Muir
LCD Comments
National Government Services, Inc.
P.O. Box 7108
Indianapolis, IN 46207-7108
PartBLCDComments@anthem.com
(Submitted electronically)

RE: Proposed Local Coverage Determination (LCD): Stereotactic Radiation Therapy: Stereotactic Radiosurgery (SRS) and Stereotactic Body Radiation Therapy (SBRT) (DL35076)

Dear Ms. Muir:

The American Society for Radiation Oncology (ASTRO)¹ appreciates the opportunity to provide comments on National Government Services, Inc.'s (NGS) proposed Local Coverage Determination (LCD) regarding Stereotactic Radiation Therapy: Stereotactic Radiosurgery (SRS) and Stereotactic Body Radiation Therapy (SBRT) (DL35076). We are writing in support of the proposal to add choroidal melanoma as an indication for SRS. The addition of this clinical indication will enhance the quality of cancer care options for NGS Medicare beneficiaries.

ASTRO publishes a distinct series of model policies to efficiently communicate correct coverage policies for radiation oncology services. ASTRO's SRS Model Policy was most recently revised in 2015 and is enclosed for your review. The model policy provides guidance to payers on clinical indications that are appropriate for treatment with SRS, including choroidal melanoma, which should be covered by health insurance, including Medicare. Under *Indications for Coverage*, the Model Policy lists, "Primary central nervous system malignancies, generally used as a boost or salvage therapy for lesions <5 cm," which includes choroidal melanomas. Literature published since 2015 confirms that SRS for choroidal melanoma is a safe and effective treatment option²³.

¹ *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.*

² Gamma Knife Stereotactic Radiosurgery for the Treatment of Primary and Metastatic Ocular Malignancies. Arnett A.L.H., Reynolds M.M., Pulido J.S., Parney I.F., Laack N.N. (2018) *Stereotactic and Functional Neurosurgery*, 95 (6), pp. 363-368.

³ Gamma Knife radiosurgery for locally recurrent choroidal melanoma following plaque radiotherapy. Osama A. Sorour, John E. Mignano, Jay S. Duker. *Int J Retina Vitreous*. 2018; 4: 23. Published online 2018 Jun 13. doi: 10.1186/s40942-018-0123-1.

Thank you for your consideration of our comments. Should you have any questions or wish to discuss our comments further, please contact Jessica Adams, Health Policy Analyst (703) 839-7396 or via email at Jessica.adams@astro.org.

Sincerely,

A handwritten signature in black ink that reads "Laura Thevenot". The signature is written in a cursive, flowing style.

Laura I. Thevenot
Chief Executive Officer

Enclosed: ASTRO SRS Model Policy