

January 15, 2019

Teri Green  
Senior Administrator State Medicaid Agent  
Wyoming Department of Health  
6101 Yellowstone Road, Suite 210  
Cheyenne, WY 82009

RE: Wyoming Medicaid: Covered Services (Chapter 26)

Dear Ms. Green:

The American Society for Radiation Oncology (ASTRO)<sup>1</sup> would like to provide input on Wyoming's Medicaid Covered Services. We were recently informed that Wyoming Medicaid denied Intensity Modulated Radiation Therapy (IMRT) for a patient with anal cancer. We are also concerned that Wyoming Medicaid does not list radiation therapy in its Covered Services.

Radiation therapy, or radiotherapy, is the use of various forms of radiation to safely and effectively treat cancer and other diseases. Radiation therapy works by damaging the genetic material within cancer cells. Once this happens, the cancer cells are not able to grow and spread. When these damaged cancer cells die, the body naturally removes them. Normal cells are also affected by radiation, but they are able to repair themselves in a way that cancer cells cannot.

ASTRO publishes a distinct series of model policies to efficiently communicate appropriate coverage policies for radiation oncology services. We work to maintain updated information and inform payers of all changes to existing policies. All of ASTRO's Radiation Therapy Model Policies are enclosed for your review.

IMRT delivers a highly conformal radiation dose to targets positioned near sensitive normal tissues. This therapy is considered reasonable and medically necessary in instances where sparing the surrounding normal tissue is of added clinical benefit to the patient. IMRT is standard of care for curative treatment of anal cancer and is endorsed in the current National Comprehensive Cancer Network (NCCN) guidelines, which clearly state, "Intensity modulated radiation therapy (IMRT) is preferred over 3-D conformal RT in the treatment of anal carcinoma<sup>2</sup>." IMRT was accepted as standard of care for delivery of radiation for patients with anal cancer after the Radiation Therapy Oncology Group (RTOG) conducted a phase 2 multi institutional trial comparing dose painted intensity modulated radiation therapy to the conventional radiation arm from a previous RTOG trial (RTOG 9811)<sup>3</sup>. The use

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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.*

<sup>2</sup> NCCN guidelines V2.2018, page ANAL-C1. [https://www.nccn.org/professionals/physician\\_gls/pdf/anal.pdf](https://www.nccn.org/professionals/physician_gls/pdf/anal.pdf)

<sup>3</sup> Kachnic, L.A. et al. NRG Oncology/RTOG 0529: Long-Term Outcomes of Dose-Painted Intensity Modulated Radiation Therapy, 5-Fluorouracil, and Mitomycin-C in Anal Canal Cancer. *Int J Radiat Oncol Biol Phys.* 86(1):27–33.

of IMRT was associated with significant reduction of acute grade 2 hematologic toxicity, as well as reduction of grade 3 dermatologic and G.I. toxicity. IMRT is frequently used to treat anal cancer as an organ-preserving approach that avoids the need for surgery that would result in a permanent colostomy.

ASTRO's IMRT Model Policy states that all pelvic malignancies, including anal carcinomas, support the use of IMRT. **Therefore, we urge Wyoming Medicaid to provide coverage and appropriate reimbursement for all IMRT for anal cancer and all radiation therapy services, as outlined in ASTRO's Model Policies.**

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

Respectfully submitted,



Laura I. Thevenot  
Chief Executive Officer

Enclosed:

ASTRO Intensity Modulated Radiation Therapy (IMRT) Model Policy  
ASTRO Brachytherapy Model Policy  
ASTRO Proton Beam Therapy (PBT) Model Policy  
ASTRO Stereotactic Body Radiation Therapy (SBRT) Model Policy  
ASTRO Stereotactic Radiosurgery (SRS) Model Policy