

March 17, 2020

Ms. Seema Verma
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Administrator Verma,

The American Society for Radiation Oncology (ASTRO)¹ greatly appreciates the opportunity to engage with the Centers for Medicare and Medicaid Services (CMS) on a variety of issues, including the Merit-Based Incentive Payment System (MIPS). It is important that CMS continue to support cancer care and America's response to COVID-19 by delaying the upcoming March 31st MIPS submission deadline for the 2019 performance year.

Similar to all health care facilities, radiation oncology clinics nationwide face the unprecedented challenge and uncertainty of managing the care of complex cancer patients while doing their part to address the COVID-19 outbreak. ASTRO members are reporting that the combined burden of the COVID-19 response and submitting quality data is overwhelming; particularly as both clinical staff and administrative staff responsible for data submission are being diverted to address the COVID-19 response within their hospitals and clinics. Cancer patients are at particular risk of COVID-19, and radiation oncology practices are making significant changes to address this outbreak. Protecting patients requires the full attention of all staff members.

Given the strains on radiation oncology practices and this extraordinary hardship, we recommend CMS extend the deadline for MIPS reporting for the 2019 performance year. ASTRO remains committed to the successful implementation the MIPS program, and we believe an extension will provide radiation oncology clinics the time necessary to support the COVID-19 response and their patients, and successfully participate in the program. We appreciate your consideration and look forward to continued opportunities to engage on the implementation of this important quality program.

Sincerely,



Laura I. Thevenot
Chief Executive Officer

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.