September 15, 2023

Maureen R. Johnson, PhD
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31 Center Drive, 31/11A48
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Dear Dr. Johnson-

The American Society for Radiation Oncology (ASTRO), representing more than 10,000 global members of the radiation oncology team, is grateful for the invitation to speak at the Sept. 7, 2023 meeting of the President’s Cancer Panel on the National Cancer Plan goals. ASTRO values that the Biden Administration is engaging and empowering key cancer stakeholders in the fight against cancer. We are in complete alignment with President Biden’s goals and are committed to reducing cancer mortality by 50% over the next 25 years. This letter follows up on our description of ASTRO and radiation oncology activities contributing to achieving the goals and makes recommendations for the Panel’s consideration.

ASTRO members include radiation oncologists, nurses, radiation therapists, medical physicists, basic cancer scientists, radiation biologists, and other health care professionals, who work in a variety of clinical and research settings and treat more than one million Americans each year. ASTRO also works to educate patients on all aspects of radiation therapy through RTAnswers with videos and information.

Radiation oncology is a central modality in cancer treatment; about two-thirds of people diagnosed with cancer receive radiation therapy for cure and/or palliation of their cancer. We are focused on achieving the National Cancer Plan goals and below discuss some specific areas of ASTRO focus and recommendations for consideration, including:

**Deliver Optimal Care and Eliminate Inequities:** Radiation therapy is a highly cost-effective cancer treatment. Total Medicare costs for Radiation Oncology services is less than the cost of the two most expensive drugs used to treat cancer, yet radiation therapy treats far more patients.
To expand access for this high value treatment, ASTRO has proposed a new way for Medicare to pay for radiation therapy services, which would enhance access and quality, reduce disparities, and lower patient costs. The **Radiation Oncology Case Rate (ROCR) Program** would move payment from volume-based to value-based by paying for radiation therapy services on a per-patient basis, rather than per treatment. ROCR would align financial incentives with evolving clinical guidelines, including those supporting shorter, more convenient treatment regimens, when appropriate. ROCR would also create a Health Equity Achievement in Radiation Therapy (HEART) payment to reduce disparities by helping rural and underserved patients get transportation assistance to their daily treatments. ROCR capitalizes on ASTRO's highly respected quality and safety initiatives, including **APEx - Accreditation Program for Excellence** and **RO-ILS: Radiation Oncology-Incident Learning System**.

**Recommendation:** Support legislation to reform Medicare payment for radiation therapy services through the ROCR Program. Supporting ROCR will advance key cancer plan goals of delivering optimal care and eliminating inequities in radiation therapy. By leveraging evidence-based programs to enhance quality, protect safety and reduce disparities, ROCR represents a major step forward for people with cancer.

**Develop effective treatments:** ASTRO is enhancing research and innovation through supporting the field’s implementation of **translational, technological, physics and clinical advances**. We are uniquely well-positioned to drive computational and technical areas of science, and fully engaged in imaging, informatics, and data science advances for cancer care. Radiation oncology is breaking new ground through innovative uses of artificial intelligence-enabled precision radiotherapy, radiopharmaceuticals, radiation-immunotherapeutic combinations, ultra-high-dose rate (FLASH) radiotherapy, proton/particle therapy and survivorship care. ASTRO supports career development in research, including our Research-Oriented Career Knowledge and Support (ROCKS) program, and funds early career investigators in partnership with leading patient advocacy groups and industry.

**Recommendation:** Increase investments in biomedical cancer research at the National Institutes of Health and the National Cancer Institute. Radiation oncology is responsible for 40% of all cancer cures. Specific investments in radiation therapy research and innovation would improve cure rates and provide palliative relief for many others. ASTRO also urges continued support of emerging innovations through research at the Advanced Research Projects Agency for Health and the Cancer Moonshot 2.0 initiative.

**Optimize the Workforce:** ASTRO’s **strategic plan** prioritizes fostering a **diverse radiation oncology workforce**, as well as enhancing research and innovation. ASTRO is promoting diversity, equity and belonging in all activities, including education and ASTRO’s journals, and taking steps to ensure the workforce reflects the population, while measuring performance through key performance indicators. We are reaching out directly to **medical student** organizations and creating programs to mentor and equip a diverse set of physicians and researchers, while expanding the reach and accessibility of
educational offerings, including our world-class Annual Meeting, which is live and virtual, and multidisciplinary meetings.

In addition to the physician workforce, ASTRO supports other key personnel required for safe care, including medical physicists, nurses, and radiation therapy therapists. ASTRO is concerned about shortages and maldistribution among the radiation oncology workforce. A recent ASTRO survey showed more than 90% of radiation oncologist respondents said that their practices face clinical staff shortages. More than half (53%) of the doctors said the shortages are creating treatment delays for patients, and 44% say they are causing increased patient anxiety.

** Recommendation:** Support the development of a diverse human capital pipeline entering the STEM and health care fields. Investments in education and training of our youth, including early exposure to exciting technology fields such as radiation oncology, are desperately needed to optimize our health care and radiation oncology workforce. ASTRO also encourages multifaceted policy solutions that address radiation oncology workforce shortages found among medical physicists, dosimetrists, therapists, nurses, patient navigators and clinical trial coordinators, as well as policies that support staffing in rural and underserved communities.

**Maximize Data Utility:** Since 2019, ASTRO has been a leader in creating solutions to increase cancer data liquidity for patients, researchers, and clinicians. Our involvement with the HL7 FHIR Accelerator, CodeX, and as a founding member of the Minimal Common Oncology Data Elements (mCODE) initiatives, have focused on building data standards to increase the amount of high-quality, shareable data to support patient care and research. Prior to this effort, cancer data collection and exchange has been sporadic and incomplete, resulting in a lack of complete information on cancer. These approaches are supporting federal priorities of streamlined prior authorization, treatment summaries for patients and providers and the next generation of quality measures using FHIR. The CodeX development is also connecting data interoperability with ASTRO’s work with the Veterans Affairs radiation oncology quality surveillance program to further support America’s veterans treated for cancer.

** Recommendation:** Creating, testing, and implementing data standards is resource intensive, especially for medical specialty societies with the clinical subject matter expertise, but without the technical support. Currently little to no federal funding opportunities exist for these critical efforts. Cancer data must be accurate, robust and interchangeable to foster the next phase of cancer innovation. Leveraging federal resources to support private sector initiatives in informatics is essential to achieving national cancer goals.

With nearly 2,500 clinics nationwide, in metropolitan centers and rural communities, radiation oncology has contributed meaningfully to increased cancer survival and is ready to do more to achieve the National Cancer Plan goals. ASTRO looks forward to working with the President’s Cancer Panel and Biden Administration on these and other important initiatives for people with
cancer. Please contact ASTRO’s Vice President of Advocacy Dave Adler (703-839-7362; dave.adler@astro.org) with any follow up questions or requests.

Sincerely,

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