



Congress of the United States

House of Representatives

Washington, D.C. 20515

October 31, 2019

The Honorable Seema Verma
Administrator
Centers for Medicare and Medicaid Services
P.O. Box 8016
Baltimore, MD 21244-8013

Dear Administrator Verma:

I am writing in regard to the Centers for Medicare and Medicaid Services (CMS) proposed Radiation Oncology Model (RO Model). As you are aware, this model aims to reduce Medicare expenditures and improve patient quality of care by testing prospective episode-based payments for radiotherapy providers. I commend the Agency's work to develop alternative payment models (APMs) that aim to create more value in our health system by lowering Medicare expenditures and improving the patient experience.

The proposed RO Model will execute important goals to incentivize quality over quantity. However, it is my understanding that the transition to bundled payments for radiation oncology will better serve patients and providers if concerns about its scope, implementation, and payment structure are addressed.

It is my understanding that the mandatory participation, effective January 1, 2020, poses a challenge for some radiotherapy providers to fully prepare for participation in the model. I have heard from providers who do not have the resources to fully comply with the model by January 1, 2020, which poses a threat to the success of the demonstration. I encourage CMS to consider a transition period for participating practices and a delay in the proposed January 1, 2020 implementation date.

A strong radiation oncology APM should employ a payment structure that balances incentives to providers with ensuring beneficiary access to the full array of radiation modalities. I encourage CMS to consider reductions to the professional and technical discount factors to incentivize proper utilization of the RO Model. The payment structure of this model should strike a balance between the incentives to participate and the decrease in reimbursements so that seniors do not suffer as a result of reduced availability of radiotherapy.

Thank you for your consideration. As CMS continues to review feedback on the RO Model and evaluate ways to drive more value in Medicare, I respectfully request that you evaluate



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stakeholder feedback to inform a successful RO Model that results in better outcomes for patients.

Sincerely,

A handwritten signature in blue ink that reads "G Holding".

George Holding
Member of Congress