

2022 RO Model Proposed Rule Summary

On April 6, 2022, the Centers for Medicare and Medicaid Services (CMS) issued the RO Model [Proposed Rule](#), which seeks to delay the implementation of the payment model from January 1, 2023, to a date to be determined in a future notice of proposed rulemaking. According to CMS, the date will be issued as part of rule making not less than six months prior to the determined launch date. Comments in response to this proposed rule are due June 7, 2022.

In addition to the delay, CMS also notes that future rulemaking may also include modification to model design. [ASTRO issued a statement](#) saying that it is hopeful that during this interim period, CMS will make adjustments [recommended by Congress](#) and the broad [coalition of stakeholders](#) within the radiation oncology community, as we remain concerned that the model in its current form is too punitive for clinics. ASTRO remains committed to value-based care in radiation oncology. We believe that the modifications proposed by ASTRO and the radiation oncology community will ensure successful participation among physicians and facilities and produce significant savings for the Medicare program while preserving or enhancing the quality of care furnished to Medicare beneficiaries. We continue to believe that episodic payments for radiation therapy services have great potential to improve quality and equity while reducing cancer care costs, and we will continue to advocate for proposals that achieve these goals.

In this proposed rule, CMS proposes a delay in the implementation date for the RO Model, recognizing the time and commitment that RO Model participants have put into preparing for model implementation. According to the Agency, this indefinite delay allows those practices to put their efforts on pause until further notice. CMS also recognizes that while supportive of an overall shift to value-based payment, the radiation oncology community remains concerned about the significant impact of the discount factors associated with the RO Model payment methodology. CMS reiterates in this proposed rule that any reduction in the discount factors would require a broader number of participants, which it also recognizes, is a non-starter for the radiation oncology community.

In addition to the delay, CMS also notes that information is forthcoming for those practices participating in the Oncology Care Model (OCM). The OCM is set to expire on June 30, 2022, and to date no replacement policy has been announced. An informal request for information regarding the Oncology Care First (OCF) model was issued in the fall of 2019; however, no additional content related to that proposal has been issued since then.

More information about the RO Model and the proposed rule can be found on the [RO Model website](#).