



January 16, 2014

Anne Herleth, MSW, MPH
Westat
1600 Research Blvd
Rockville, MD 20850

Request for Feedback on CMS's Physician Compare Website

Dear Ms. Herleth:

The American Society for Radiation Oncology (ASTRO) appreciates the opportunity to provide written feedback on the new search functionality for the Physician Compare website, and the website, itself.

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. As the leading organization in radiation oncology, biology, and physics, representing more than 10,000 radiation oncology medical professionals treating more than 1 million Americans with cancer each year, we believe we are uniquely qualified to provide input on issues related to the Medicare program.

ASTRO supports the continuing development of Physician Compare into a valuable and reliable resource for Medicare beneficiaries. In these comments, ASTRO provides suggestions and edits for radiation oncology terms and phrases, as well as the radiation oncology search results on Physician Compare.

Physician Compare Intelligent Search Mapping – Keywords for Radiation Oncology

After reviewing the keywords spreadsheet, we have found that several radiation oncology terms and phrases are missing. ASTRO would appreciate the inclusion of the following terms and phrases, and their common variations:

- Electronic brachytherapy radiation treatment, electronic brachytherapy, electronic-brachytherapy, e-brachytherapy, e brachytherapy, e brachy, e-brachy, electronic brachetherapy radiation treatment, electronic brachetherapy, brachetherapy, brachytherapy, brackeytherapy, brachytherapy.
- Skin brachytherapy treatment, skin brachy.
- Radiation oncology treatment(s), rad onc treatment(s).
- Radiation delivery(ies).
- Tumor treatment(s).
- Radiation oncology clinic(s), rad onc clinic(s).
- Radiation oncology department(s), rad onc department(s).
- Neck cancer(s).

ASTRO would also appreciate the inclusion of the following common variations of existing keywords:

- Current Keyword: IGRT.
 - Common Variations: Image guided radiation therapy; image-guided radiation therapy, image guided radiation treatment, image-guided radiation treatment, image-guided radiation, image guided radiation, image guided treatment(s), image-guided treatment(s).
- Current Keyword: metastasis.
 - Common Variations: metastases, metastase, metastasi, metastace, metastaces.
 - ASTRO recommends these common variations for the keywords “brain metastasis” and “bone metastases” as well.
- Current Keyword: radiation therapy
 - Common Variations: radiation therapy treatment(s), radiation therapies.
- Current Keyword: 3-d crt.
 - Common Variations: 3d radiation treatment(s), 3d crt, 3d treatment(s).
- Current Keyword: SBRT.
 - Common Variation: sbtr.
- For current keyword phrases that use “therapy,” there should also be the inclusion of a variation that uses “treatment,” if it does not already exist. For example, the variation for the current keyword phrase “stereotactic body radiation therapy” would be “stereotactic body radiation treatment.”

Physician Compare Search Experience

ASTRO performed several searches on the Physician Compare website and we were generally pleased with the search functionality and results. The website is user-friendly and easy to comprehend, and the information is displayed in a well-organized manner. However, we recommend that the results be the same whether beneficiaries search using a term or phrase recommended by the Intelligent Search functionality or just type in the term or phrase themselves. Currently, when beneficiaries search the website without specifically selecting a term or phrase from the Intelligent Search list, the results are different and more inclusive of other specialties. For example, if a beneficiary just types in “radiation oncology” and hits search, the results include family practices and other specialties like medical oncology. However, if the beneficiary starts typing “radiation oncology,” and then selects that phrase from the list generated by Intelligent Search functionality, then only radiation oncology providers are displayed. We recommend editing the search functionality so that only specialty-specific results are displayed, regardless of whether an Intelligent Search word is selected or not. We believe this would decrease confusion for beneficiaries who are already searching complex radiation oncology terms and phrases, and will lead them directly to what they are searching for.

Additionally, ASTRO urges the inclusion of radiation oncology as a specialty for all cancer and cancer-related diagnosis and symptoms listed in the middle column under the “Search Another Way” tab. Currently, radiation oncology is consistently listed as a specialty option when cancer is a diagnosis, however not all cancer diagnoses are listed. For example, radiation oncology is listed for a female beneficiary with a “Breast Lump/Mass/Tumor/Cancer.” However, while

“Prostate Enlargement/Hypertrophy/Benign Prostatic Hyperplasia (BPH)” is a search term, “Prostate Cancer” is not a search term when looking for a male patient. Prostate cancer should be added with radiation oncology as a specialty option. Similarly, under neck, thyroid cancer is listed but other neck cancers like tonsil or larynx are not. These patients often receive radiation therapy, so either a catch all ‘neck cancer’ category should be added or the particular disease sites should be included.

Thank you for the opportunity to provide feedback. ASTRO looks forward to continued collaboration to ensure that quality, valuable, and useful information is provided to beneficiaries to help them make educated health care decisions. Should you have any questions, please contact Priya Lamba, Medicare Analyst, at 703-839-7396 or priyal@astro.org.

Thank you.

A handwritten signature in cursive script that reads "Laura Thevenot".

Laura I. Thevenot
Chief Executive Officer