



March 20, 2020

Christina Ritter
Director, Patient Care Models Group
Center for Medicare and Medicaid Innovation
2810 Lord Baltimore Drive
Windsor Mill, MD 21244

RE: Medicare Program; Specialty Care Models to Improve Quality of Care and Reduce Expenditures

Dear Ms. Ritter:

The American College of Radiology (ACR), representing more than 38,000 diagnostic radiologists, radiation oncologists, interventional radiologists, nuclear medicine physicians and medical physicists, appreciates the opportunity to submit a request to the Center for Medicare and Medicaid Innovation (CMMI) on the Radiation Oncology (RO) Model. **Due to the current healthcare climate surrounding COVID-19 and state of National Emergency, we urge a delay in implementation of the RO Model.** This request is in the best interest of patients, cancer care, and radiation oncology practices across the country.

The ACR recognizes and appreciates that “Specialty Care Models to Improve Quality of Care and Reduce Expenditures” is now listed as under review at the Office of Management and Budget. We look forward to the publication of the final rule, and support its dissemination. While the ACR does not know the finalized implementation date for the RO Model, we anticipate it may be around July 1, 2020. The ACR strongly recommends at least a 6-month delay in implementation of the model. Due to COVID-19, there are increasing disruptions in the healthcare system affecting radiation oncology practices. Administrative and clinical priorities are focused on patient access, patient safety, and staff safety, and a complete overhaul of the payment structure for RO care is not appropriate at this time nor in the next several months. The ACR does not want RO Model implementation to distract from COVID-19 response and adjustment to regulations.

For these reasons, the ACR recommends CMMI postpone implementation of the RO Model to January 1, 2021, at the earliest. Furthermore, due to the uncertainty of COVID-19 and its effects, the ACR recommends this delay be subject to extension if necessary.

The ACR recommends an additional comment period upon release of the “Specialty Care Models to Improve Quality of Care and Reduce Expenditures” final rule. This will allow for stakeholders to respond on possible changes in radiation oncology practices that may have occurred due to the effects of COVID-19 and will need to be incorporated as standard practices post this pandemic.

Headquarters
1891 Preston White Dr
Reston, VA 20191
(703) 648-8900

Government Relations
505 9th Street NW, Suite 910
Washington, DC 20004
(202) 223-1670

Clinical Research
1818 Market St, Suite 1600
Philadelphia, PA 19103
(215) 574-3150

Christina Ritter
March 20, 2020
Page 2

The ACR appreciates the opportunity to make a request to the Center for Medicare and Medicaid Innovation on the RO Model. **The ACR fully supports the more detailed request for delay as submitted by the American Society for Radiation Oncology (ASTRO).** If you have any questions or comments on our letter, please do not hesitate to contact Samantha Porter at sporter@acr.org or Alicia Blakey at ablakey@acr.org.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "William T. Thorwarth, Jr.", with a stylized flourish at the end.

William T. Thorwarth, Jr, MD, FACR
Chief Executive Officer

Cc: Lara Strawbridge, CMMI
Marcie O'Reilly, CMMI
Claire Kihn, CMMI
Zeke Silva, MD
Seth Rosenthal, MD
William Small, MD
Najeeb Mohideen, MD
Join Luh, MD
Greg Nicola, MD
Lauren Golding, MD
Cindy Moran, ACR
Samantha Porter, ACR
Alicia Blakey, ACR