



AdvaMed

Advanced Medical Technology Association

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June 7, 2022

Via Electronic Mail

Chiquita Brooks-LaSure, Administrator
Centers for Medicare and Medicaid Services
Attn: CMS-5527-P2
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244

Re: Radiation Oncology (RO) Model

Dear Administrator Brooks-LaSure,

On behalf of the Advanced Medical Technology Association (AdvaMed), we are pleased to offer comments on the RO Model proposed rule. AdvaMed member companies produce the medical devices, diagnostic products, and health information systems that are transforming health care through earlier disease detection, less invasive procedures, and more effective treatments. AdvaMed members range from the largest to the smallest medical technology innovators and companies. We are committed to ensuring patient access to life-saving and life-enhancing devices and other advanced medical technologies in the most appropriate settings.

The RO Model represents a multi-year effort on the part of CMS, radiation oncologists, medical device companies, and other interested stakeholders to improve patient outcomes while lowering costs for patients and the Medicare program. AdvaMed appreciates the tremendous amount of work that has gone into developing the model. However, given stakeholders' concerns with some aspects of the current RO Model shared in previous comment letters, we support CMS' proposal to delay the current RO Model start date until future rulemaking.



We continue to believe in value-based payment and its ability to provide stable, predictable payments for radiation oncology that cannot be realized under the fee-for-service systems. We also remain committed to working alongside the Agency to develop and implement an alternative payment model that balances the needs and goals of Medicare and radiation oncology while ensuring patient access to high-value cancer care.

We appreciate this opportunity to comment on the proposed RO Model delay. If you have any questions, please contact Kirsten Tullia (ktullia@advamed.org).

Sincerely,



Chandra N. Branham, J.D.

Senior Vice President and Head of Payment & Healthcare Delivery Policy

