September 12, 2025

The Honorable John Thune
Majority Leader
US Senate
SD-511
Washington, DC 20510

The Honorable Chuck Schumer
Minority Leader
US Senate
SH-322
Washington, DC 20510

The Honorable Mike Johnson
Speaker
US House of Representatives
568 Cannon House Office Building
Washington, DC 20515

The Honorable Hakeem Jeffries
Minority Leader
US House of Representatives
2267 Rayburn House Office Building
Washington, DC 20515

Dear Majority Leader Thune, Minority Leader Schumer, Speaker Johnson, and Minority Leader Jeffries:

The 105 undersigned organizations – representing radiation oncology physicians, radiation therapy professionals, patients, hospitals and hospital systems, freestanding radiation centers, health care professionals, equipment manufacturers, and organizations across the country – appreciate Congress' longstanding bipartisan and bicameral support for radiation oncology, and **we urge passage of bipartisan legislation this year to protect access to high quality radiation therapy cancer services.**

After more than 25% in cuts since 2013 under the Medicare Physician Fee Schedule (MPFS), the proposed rule for CY2026 would result in additional reductions to radiation therapy. For instance, without a correction, independent physician offices treating prostate cancer with a common course of radiation therapy will see an estimated per case decline of more than 30% next year. Continued MPFS cuts have contributed to a 51% increase in radiation oncology practice consolidation since 2015, which forces rural and underserved patients to travel farther from home to receive their cancer treatments. People diagnosed with cancer and the radiation oncology providers responsible for their care deserve better.

We urge Congress to pass the Radiation Oncology Case Rate (ROCR) Value Based Payment Program Act of 2025, introduced in the Senate (S.1031) by Sens. Thom Tillis (R-NC) and Gary Peters (D-MI), and in the House of Representatives (H.R.2120) by Reps. Brian Fitzpatrick (R-PA), Jimmy Panetta (D-CA), John Joyce, MD (R-PA), and Paul Tonko (D-NY). This legislation would increase access to patient care, enhance the quality of cancer treatments, encourage innovation, lower barriers to care for rural and underserved patients, and save Medicare $200 million over 10 years.

In the July MPFS proposed rule, the Centers for Medicare and Medicaid Services (CMS) summarized its longstanding challenges in setting payment rates under the MPFS for certain complex services, noting the unique characteristics of radiation oncology as a "clear example of this dynamic." The Agency said, "The costs for furnishing radiation treatment delivery services in nonfacility settings (that is, freestanding radiation therapy centers) include capital-intensive and

specialized resources that are *difficult to compare* to the kinds of resources involved in furnishing most other kinds of services in other nonfacility settings." As an example, the Agency noted the $3 million price for the radiation therapy linear accelerator is more than double the cost of the next most expensive equipment (MRI) used in a physician office.

CMS says it determined that radiation oncology's long-term capital and infrastructure investments are more like hospitals than physician offices and therefore is proposing to use hospital outpatient data to inform freestanding radiation therapy technical payments. **We SUPPORT the use of hospital data in this scenario, which directly matches the ROCR Act's payment methodology.** We note, however, that CMS' application of this new approach in 2026 has technical flaws that must be addressed before implementation.

Beyond these pervasive methodological issues, the current fee-for-service payment system fails to align with clinical guidelines that recommend shorter courses of radiation treatment, when appropriate. This incongruity financially penalizes doctors in both freestanding radiation centers and hospital radiation clinics when they provide the best care for their patients. If passed, the ROCR Act would:

- Harmonize payment incentives with guidelines by supporting shorter treatments, allowing patients more time to work and spend with loved ones.
- Ensure access to advanced cancer treatments close to where patients live.
- Remove transportation-related barriers for rural and underserved patients.
- Boost innovation through quality standards consistent with modern technology and practice.
- Enhance already excellent quality through accreditation with stronger incentives.
- Unify payments across different care settings.
- Update payments annually based on medical inflation.

Cost-effective, high-value radiation therapy is primed to make incredible gains for people with cancer, but there is widespread recognition that the current reimbursement system is holding back progress. **We urge Congress to advance the ROCR Act this year to achieve payment reform that produces better outcomes and lower costs for patients.**

Thank you for your consideration. Please contact Dave Adler, Vice President of Advocacy for the American Society for Radiation Oncology (ASTRO), at dave.adler@astro.org for more information.

Sincerely,

Accuray Incorporated
AdvaMed
Advocate Health
Advocate Radiation Oncology
American Association of Medical Dosimetrists (AAMD)
American Association of Physicists in Medicine (AAPM)
American College of Radiation Oncology (ACRO)
American College of Radiology
American Society for Radiation Oncology (ASTRO)
American Society of Radiologic Technologists
Anchorage and Valley Radiation Therapy Centers
Angelhaven, LLC (Dexter, Michigan)
Appalachian Radiation Oncology
Associates in Radiation Medicine, PC
Association for Clinical Oncology (ASCO)

Association of Cancer Care Centers (ACCC)
Association of Northern California Oncologists (ANCO)
Atrium Health
Baptist Hospitals of Southeast Texas
BAMF Health
Boston Scientific
Brown University Health
Cancer*Care*
Cancer Care Northwest
Cedars-Sinai Medical Center
Coastal Edge Radiation Oncology
Coastal Radiation Oncology Medical Group
Combined Radiation Provider Group (Anchorage, Alaska)
Community Cancer Center (Roseburg, Oregon)
Community Oncology Alliance (COA)
Compass Oncology
Comprehensive Cancer Centers of Nevada/Las Vegas Cyberknife
Corewell Health
Elekta, Inc.
Elsevier, Inc.
Emory University
Florida Oncology Tavares
Florida Society of Clinical Oncology
Gamma West Cancer Services
Generations Radiotherapy & Oncology PC
GenesisCare
Hunterdon Medical Center
Indiana Oncology Society
Ironwood Cancer & Research Centers
Johns Hopkins University School of Medicine Department of Radiation Oncology
Loyola Medicine
LUNGevity Foundation
Medical Oncology Association of Southern California
Minnesota Oncology
Minnesota Society of Clinical Oncology (MSCO)
Mississippi Oncology Society
Mount Sinai Health System
Nebraska Oncology Society
New York Hematology Oncology
North Cascade Cancer Center, LLC
Northeast Radiation Oncology (Bangor, Maine)
Northern New England Clinical Oncology Society
NorthMain Radiation Oncology
Northwestern Medicine – Department of Radiation Oncology
Novocure
Oklahoma Cancer Specialists and Research Institute
OneOncology
Ovarian Cancer Research Alliance
Penn Medicine Department of Radiation Oncology and Proton Therapy
Penn State Health
Prostate Cancer Institute of Arizona
Radiation Oncology Associates (Augusta, GA)
Radiation Oncology Associates of the National Capital Region
Radiation Oncology Centers, PC
Radiation Oncology of Lexington, PSC
RaySearch Laboratories AB (publ)
RCCS
RefleXion
Renaissance Institute of Precision Oncology & Radiosurgery
SERO
Siemens Healthineers
Society for Radiation Oncology Administrators (SROA)
Stanford University Department of Radiation Oncology
Spectrum Healthcare Partners
Sun Nuclear, a Mirion Medical Company
Sutter Health
Tampa Bay Radiation Oncology
Tennessee Oncology
Texas Cancer Institute
Texas Radiotherapy
The Radiosurgery Society
Toledo Clinic, Inc.
Trinity Health
Trinity Health Mid-Atlantic
University of Iowa Hospitals and Clinics

University of Kansas – Department of Radiation Oncology
University of Kentucky Health Care
University of Louisville
University of Maryland
University of Michigan
University of North Carolina, Chapel Hill
University of Rochester Medical Center
University of Texas Medical Branch, Galveston
US Oncology Network
Valley Health System (Paramus, NJ)
Vision RT
Washington University
Western Radiation Oncology
Willis-Knighton Health System
WVU Cancer Institute at Wheeling Hospital