



Summary of CMS' Final Radiation Oncology Demo Rule – November 2, 2021

Late yesterday, CMS published its final Radiation Oncology (RO) demonstration rule that is contained in the agency's [final Outpatient Prospective Payment System rule](#). The discussion begins at page 1,132. The OPPS fact sheet is [here](#). CMS' RO home page is [here](#).

Clients will recall the RO demo was first proposed in July 2019 and was delayed twice in part due to the COVID-19 pandemic. The demo is mandatory in randomly selected by Core Based Statistical Areas (CBSAs). In the proposed OPPS rule out this past July, CMS proposed changes to the RO demo, several of them were finalized yesterday.

Based on the July OPPS proposed rule, here are the final policy provisions.

- The RO model will begin January 1, 2022. The demo has a five-year life or will run until December 31, 2026.
- CMS is removing liver cancer diagnoses and brachytherapy from the demonstration. The latter will be paid under the FFS schedule.
- In calculating reimbursement, CMS will use 2017-2019, not 2016-2018, as their baseline or benchmark years.
- As discussed in the proposed '22 OPPS rule, CMS is finalizing lowering the professional and technical component discounts to 3.5% and 4.5%, respectively.
- If a FFS beneficiary enrolls in MA during an RO episode before completing treatment, CMS RT services will be paid under the FFS schedule instead of the RO bundled payment.
- Because of the PHE and ongoing climate disasters, CMS is adding an extreme and uncontrollable circumstances (EUC) policy that will provide participants flexibility in reporting requirements and potentially cause adjustments in reimbursement.
- CMS is modifying the current overlap policy for the Pennsylvania Rural Health Model (PARHM) to only exclude hospital outpatient departments participating in PARHM, not just PARHM-eligible hospitals. The RO demo excludes hospital outpatient departments participating in the Community Transformation Track for the CHART model. The RO Model would follow the same policy for overlap between the RO Model and MSSP ACOs.
- CMS will provide RO participants with additional information via upcoming learning events and materials.

If you have any questions please contact David Introcaso, Ph.D., VP, Regulatory Policy, at 202.907.7426 or at david.introcaso@shcare.net.