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March 1, 2019

**VIA ELECTRONIC DELIVERY**

Senator Lamar Alexander  
Chairman  
United States Senate Committee on Health, Education, Labor, and Pensions  
United States Senate  
Dirksen Senate Office Building  
Room 428  
201 1<sup>st</sup> ST NE  
Washington, DC 20510

**Re: The Senate Committee on Health, Education, Labor and Pensions  
(HELP) Request for Information on Rising Healthcare Costs**

Dear Chairman Alexander and Ranking Members of the Senate HELP  
Committee:

The Association of Community Cancer Centers (ACCC) appreciates the opportunity to respond to the Senate HELP Committee Request for Information (RFI) with steps for the 116<sup>th</sup> Congress to address America's rising healthcare costs and steps to recommend to healthcare leadership within the Trump Administration, published on December 11, 2018. ACCC is a membership organization whose members include hospitals, physicians, nurses, social workers, and oncology team members who care for millions of patients and families fighting cancer. ACCC represents more than 23,000 cancer care professionals from approximately 2,000 hospitals and private practices nationwide. It is estimated that 65 percent of cancer patients nationwide are treated by a member of ACCC.

The cancer care delivery infrastructure is a fragile construct of hospital outpatient departments and physician offices working together to provide care to patients in their communities. Physicians and providers face growing numbers of patients requiring cancer care. As a growing public health concern that has great financial impact on the American healthcare system, the practices that treat cancer patients, and those receiving care themselves, face numerous obstacles directly related to cost of care that affect the delivery of oncology therapy services. The ability of members of the cancer care team to provide comprehensive care depends on several factors, including adequate Medicare

payment rates and for cancer care items and services. ACCC is committed to ensuring that cancer patients have access to the entire continuum of quality cancer care, including access to appropriate cancer therapies in the most appropriate setting.

ACCC is pleased that healthcare leadership in Congress is dedicated to continuing to put forth efforts to tackle rising healthcare costs for the American public to ease financial strain on patients, providers, and the overall American healthcare landscape. ACCC remains committed to support policies that reduce overall beneficiary out-of-pocket costs, decrease the administrative burden placed on providers, and decrease the strain on already-challenged aspects of the cancer care delivery system given the high cost of care associated with oncology.

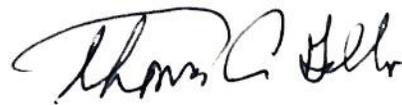
ACCC understands that the United States healthcare system is shifting fundamentally toward a payment and delivery paradigm based on value, and community cancer centers are an integral part of this reform effort. We, as an organization, fully support the overarching goal of this shift to bend the cost curve by improving care, providing the right care at the right time, reducing over-treatment and under-treatment, and decreasing hospital admissions and readmissions. ACCC members have a long history of working with the Center for Medicare & Medicaid Services (CMS) on meaningful payment reform, including partnering with the Center for Medicare and Medicaid Innovation (CMMI) to achieve a shared goal of improving care and reducing costs for cancer patients through the Oncology Care Model (OCM) and the ACCC OCM Collaborative. As a part of these broad value-based care efforts, ACCC recognizes the need for a continued conversation about pharmaceutical pricing and strategies to rein in drug costs for the Medicare program and its' beneficiaries. However, this conversation needs to consider the relative costs and benefits of all aspects of healthcare, rather than focusing narrowly on reducing drug costs to the detriment of quality, access, and innovation.

Of the currently 180 cancer care programs participating in the OCM, ACCC has had the opportunity to engage over 80 percent of these practices through our Collaborative since the model's inception. Many of our members have chosen to take part in this voluntary and revolutionary effort in the wake of their challenges to provide care in their communities at reduced payment rates due to sequestration, decreasing drug administration rates, and inadequate reimbursement for other supportive care services required to provide quality and comprehensive cancer care. ACCC stands firmly in support of the continued release of alternative payment models (APMs) that seek to transform the current fee-for-service healthcare world into a system truly focused on delivery of value-based cancer care. Current practice commitment to OCM demonstrates the oncology communities' commitment and willingness to voluntarily participate in new payment models. The willingness of OCM participants in a variety of practice sizes and locations across the United States reinforce the fact that the oncology community likely would support a voluntary drug pricing and healthcare reform effort – with the appropriate patient and provider safeguards. The OCM continues to serve as an example a voluntary model that was developed through careful deliberations with stakeholders buy-in from its participants, though opportunities remain for improvements to that model. Beyond participation in the OCM, ACCC is committed to the support of models from CMS/CMMI that seek direct input in design and dissemination from the patient and provider community through existing statutory authority.

ACCC continues to support voluntary systems that incentivize high value care by empowering physicians to serve as stewards of evidence-based prescribing and utilization aligned with patient needs. With the potential for new models coming out of CMMI, we support the convening of relevant healthcare stakeholders at CMS/CMMI, Congressional healthcare leadership, as well as providers to design and implement new forms of healthcare delivery.

ACCC greatly appreciates the opportunity to comment to the Senate HELP Committee RFI on rising healthcare costs. ACCC and its' members reiterate our commitment to promoting access to effective cancer treatments for all beneficiaries who need them. We look forward to the opportunity to provide organizational perspective to your Congressional staff and members of your committee to further provide for the development of Congressional actions to tackle rising healthcare costs. If you have any questions about our comment letter or would like to discuss our comments in further detail, please contact Blair Burnett at (301) 984-9496, ext., 213, or [bburnett@acc-cancer.org](mailto:bburnett@acc-cancer.org).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas A. Gallo". The signature is fluid and cursive, with a large initial "T" and "G".

Thomas A. Gallo, MS, MDA  
President, Association of Community  
Cancer Centers