



DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF INSPECTOR GENERAL

WASHINGTON, DC 20201



Kimberly Commins-Tzoumakas
Legal Counsel for 21st Century Oncology
Hall Render Killian Heath and Lyman
201 W. Big Beaver, Suite 1200
Troy, MI 48084

Re: Corporate Integrity Agreement between the Office of Inspector General of the Department of Health and Human Services ("OIG") and 21st Century Oncology, LLC ("21st Century"), Effective December 16, 2015

Dear Ms. Commins-Tzoumakas:

This letter is to memorialize the expansion of the above-referenced Corporate Integrity Agreement (the "CIA") effective as of March 2nd, 2016. In addition to all obligations in the CIA previously entered into on December 16, 2015, 21st Century agrees that for the term of the CIA it will also comply with the following:

1. Within 90 days of this letter, 21st Century will develop a written plan (Additional Training Plan) that outlines the steps it will take to ensure that all 21st Century employed Radiation Oncology Physicians and Physicists are trained on the appropriate use of the GAMMA function and related billing guidelines, specifically related to CPT code 77300, and submit the Additional Training Plan to the OIG. Within 30 days of the OIG's receipt of 21st Century's Additional Training Plan, OIG will notify 21st Century of any comments or objections to the Additional Training Plan. Absent notification by the OIG that the Additional Training Plan is unacceptable, 21st Century may implement its Additional Training Plan. 21st Century shall furnish training pursuant to the Additional Training Plan during each Reporting Period under the CIA. Each individual who is required to attend training shall certify, in writing or in electronic form, that he or she has received the required training. The certification shall specify the type of training received and the date received. The Chief Compliance Officer (or designee) shall retain the certifications, along with all course materials, together with all training materials otherwise required under the CIA. 21st Century shall review the Additional Training Plan annually, and, where appropriate, update the Additional Training Plan to

reflect changes in Gamma technology and any issues discovered during internal audits or the Claims Review, and any other relevant information. Any updates to the Additional Training Plan must be reviewed and approved by the OIG prior to the implementation of the revised Additional Training Plan. Within 30 days of OIG's receipt of any updates or revisions to 21st Century's Additional Training Plan, OIG will notify 21st Century of any comments or objections to the revised Training Plan. Absent notification from the OIG that the revised Additional Training Plan is unacceptable, 21st Century may implement the revised Additional Training Plan. 21st Century may provide the training required under this Additional Training Plan through appropriate computer-based training approaches. If 21st Century chooses to provide computer-based training, it shall make available appropriately qualified and knowledgeable staff or trainers to answer questions or provide additional information to the individuals receiving such training. Finally, 21st Century shall ensure that new Radiation Oncology physicians and physicists are trained in the appropriate use of GAMMA within 30 days of employment by 21st Century.

2. Within 90 days of this letter, 21st Century shall engage an Independent Review Organization, or if one is engaged, expand the scope of the Independent Review Organization, to conduct an annual review of 100 claims reimbursed by Medicare or TRICARE per year billed under CPT Code 77300 ("Additional Review"). The scope of the Additional Review shall be to ensure that the documentation demonstrates that CPT Code 77300 has been appropriately ordered and reviewed by a physician. All other existing obligations related to the Independent Review Organization in the CIA shall apply to this Additional Review.

Please review these additions with your client and acknowledge agreement with these additional requirements by signing below and returning a copy to the OIG.

Sincerely,

/Robert K. DeConti/

Robert K. DeConti
Assistant Inspector General for Legal Affairs

21st Century hereby acknowledges and agrees to comply with the additional obligations under our December 16, 2015 CIA as outlined above.

21st Century Oncology, LLC

Counsel for 21st Century

/Daniel Dosoretz/

/Kimberly Commins-Tzoumakas/

DANIEL E. DOSORETZ, M.D.
Chief Executive Officer

KIMBERLY J. COMMINS-TZOUMAKAS

Dated: 3/2/16

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