



## Oncology Nursing Society

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Partnership or Quality Measurement (PQM)  
Pre-Rulemaking Measure Review (PRMR)  
Measures Under Consideration (MUC)  
Battelle  
c/o Centers for Medicare and Medicaid Services

Submitted electronically via [PRMR MUC List Commenting Form](#)

### RE: MUC2023-161: Appropriate Germline Testing for Ovarian Cancer Patients

Oncology nurses are privileged to support people with cancer through the entire cancer experience, from diagnosis and treatment into survivorship or as they face their end-of-life journey. The mission of the Oncology Nursing Society is to lead the transformation of cancer care and promote excellence in oncology nursing and quality cancer care. As such, **we strongly support and encourage a recommendation to adopt the measure, *Appropriate Germline Testing for Ovarian Cancer Patients*, in CMS' Merit Based Incentive Payment System (MIPS) for CY 2025.**

According to the American Cancer Society, ovarian cancer is the deadliest of all gynecological cancers with a survival rate of less than 50 percent. Nearly 20,000 women were diagnosed this year, and sadly, over 13,000 did not survive. Research shows wide disparities in survival and treatment based on race, ethnicity, insurance coverage, socioeconomic status and geographic location.

Improving the quality and cost of care requires clinicians to take appropriate steps that lead to better outcomes. For ovarian cancer patients, this means holding clinicians accountable for ensuring ovarian cancer patients have appropriate germline testing consistent with clinical guidelines.

As explained in the measure rationale,

*Despite current recommendations for all women diagnosed with ovarian cancer to receive genetic testing, only approximately 30 percent of women undergo any genetic testing. Germline mutations in BRCA1 and BRCA2 have been identified in 13-15 percent of women diagnosed with ovarian cancer, and somatic mutations are found in an additional 7 percent. The high incidence of these mutations and the advent of therapy targeted toward BRCA mutations warrant testing in all individuals diagnosed with ovarian cancer for the purpose of determining treatment recommendations, risk of other cancers, and need for cascade testing of family members.*

Lack of germline testing in ovarian cancer may lead to ineffective treatments, unnecessary patient suffering and increased healthcare costs. Additionally, germline testing can serve as an important tool in the early diagnosis of ovarian cancer for a patient's relatives, leading to improved outcomes. Because the symptoms of ovarian cancer are often mistaken for other conditions, patients are frequently

diagnosed in the later stages of this disease, when the survival rates are lowest. Measures to increase germline testing will save both lives and costs to the healthcare system and help address the inequalities in the survival rate.

If adopted by CMS for the MIPS program, ONS would work to educate the 130,000 oncology nurses we represent in the United States on the availability of this important measure and encourage reporting.

***ONS strongly supports this measure and encourages a recommendation for its adoption in the MIPS program.*** Should you have any questions, please contact Jaimie Vickery, Director of Government Affairs and Advocacy, at [jvickery@ons.org](mailto:jvickery@ons.org) if you have any questions.

Sincerely,

The Oncology Nursing Society

**About ONS** The Oncology Nursing Society (ONS) is a professional organization of over 35,000 registered nurses and other healthcare providers dedicated to excellence in patient care, education, research, and administration in oncology nursing. ONS members are a diverse group of professionals who represent a variety of professional roles, practice settings, and subspecialty practice areas. Oncology nurses are leaders in the healthcare arena, committed to continuous learning and leading the transformation of cancer care by advocating for high quality care for people with cancer.