



Oncology Nursing Society

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February 16, 2024

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

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

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

The Oncology Nursing Society (ONS) is a professional organization representing the interests of the over 130,000 oncology nurses across the United States 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 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.

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 will 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.

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.

We appreciate the committee's deliberation on the measure, *Appropriate Germline Testing for Ovarian Cancer Patients*, and its position to "recommend with conditions." We agree with the committee that this measure is relevant for the Merit-Based Incentive Payment System (MIPS) program, particularly given the measure rationale. Precision medicine is critical to targeting appropriate treatments for patients with cancer, and this measure will help facilitate increased use of these tools where they are available.



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ONS continues to support the adoption of this measure in the CY 2025 MIPS program and, if adopted by the Centers for Medicare and Medicaid Services (CMS) for use in MIPS, will work to educate its membership on the availability of the measure and encourage reporting.

For more information, please contact Jaimie Vickery, ONS Director of Government Affairs and Advocacy at jvickery@ons.org.

Sincerely,

The Oncology Nursing Society