



April 3, 2024

The Honorable Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare and Medicaid Services  
Department of Health and Human Services  
Hubert H. Humphrey Building  
200 Independence Avenue  
Washington, DC 20201

**RE: Clarification on Regulatory Requirements to Deliver Principal Illness Navigation (PIN) Services**

The Oncology Nursing Society appreciates the Centers for Medicare and Medicaid Services (CMS) ongoing efforts to address health-related social needs through the CY 2024 Medicare Physician Fee Schedule (PFS), and specifically, finalizing provisions for Principal Illness Navigation (PIN) services. These policies significantly enhance the support structure for patients navigating the complexities of cancer care and treatment, particularly benefiting underserved populations who face substantial barriers in accessing care and move us closer to achieving a key goal of the Cancer Moonshot – that every American with cancer has access to covered patient navigation services.

While we commend CMS for advancing PIN services, ONS and its members are concerned that the CY 2024 Medicare PFS final rule did not clearly convey that oncology certified nurses are fully equipped to deliver PIN services without the necessity for additional training or certification as a Community Health Worker (CHW) (in states where certification is available). As such, **we respectfully request CMS explicitly acknowledge that oncology certified nurses possess the requisite competencies to deliver PIN services without additional training or CHW certification. Specifically, we urge CMS to provide explicit clarification, either in the CY 2025 PFS rulemaking or through a revised FAQ document, affirming that oncology certified nurses are qualified to provide PIN services based on their existing training, licensure, and oncology certification.**

ONS and its affiliate, the Oncology Nursing Certification Corporation (ONCC), share the perspective that the extensive training, education, and licensure associated with oncology nursing certification inherently encompass the competencies outlined in the final rule and required for effective patient navigation. Oncology certified nurses, with their comprehensive nursing education and specialized oncology training, which is validated through a rigorous testing process, embody the very essence of patient navigation, equipped with the breadth of knowledge and empathy necessary to meet these critical patient needs. Clarifying this will facilitate smoother implementation of PIN services, thereby directly benefiting patient care and advancing health equity.

Thank you for your ongoing commitment and leadership toward improving healthcare access and quality for cancer patients. We are optimistic about a resolution that acknowledges the critical role of oncology certified nurses and would be available for further dialogue with you on this issue. Should you have any questions, please contact Jaimie Vickery, ONS' Director of Government Affairs and Advocacy, at [healthpolicy@ons.org](mailto:healthpolicy@ons.org).

Sincerely,



Brenda Nevidjon, MSN, RN, FAAN  
CEO, Oncology Nursing Society



Tony Ellis, MEd, IC-CCP  
Executive Director, Oncology Nursing Certification Corporation

The **Oncology Nursing Society (ONS)** is a professional association that represents 100,000 nurses and is the professional home to more than 35,000 members. ONS is committed to promoting excellence in oncology nursing and the transformation of cancer care. Since 1975, ONS has provided a professional community for oncology nurses, developed evidence-based education programs and treatment information, and advocated for patient care, all in an effort to improve the quality of life and outcomes for patients with cancer and their families.