



COMMUNITY ONCOLOGY ALLIANCE

Dedicated to Advocating for Community Oncology Patients and Practices

1225 New York Avenue, NW, Suite 600, Washington, D.C. 20005
(202) 729-8147 | communityoncology.org

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Submitted electronically to <https://p4qm.org/prmr-muc-list>.

Partnership for Quality Measurement
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RE: Pre-Rulemaking Measures Under Consideration List Commenting

On behalf of the Community Oncology Alliance (COA), we are submitting these comments in strong support of the adoption of patient-reported outcomes measures (PROMs) in cancer care.

As background, COA is an organization dedicated to advocating for the complex care and access needs of patients with cancer and the community oncology practices that serve them. COA is the only non-profit organization in the United States dedicated solely to independent community oncology practices, which serve the majority of Americans receiving treatment for cancer. Since its grassroots founding over 20 years ago, COA's mission has been to ensure that patients with cancer receive quality, affordable, and accessible cancer care in their own communities where they live and work, regardless of their racial, ethnic, demographic, or socioeconomic status.

As such, COA appreciates the work of the Partnership for Quality Measurement in reviewing and advancing important measures in cancer care. We strongly believe that PROMs are an important resource for tracking the patient's journey through their treatment and ensuring adequate measurement and reporting on their outcomes.

Although measuring quality outcomes is sometimes reduced to survivorship, significant provider-patient touchpoints during treatment lend themselves to patient-reported information. The patient's journey in cancer care is one of the most complex of all medical conditions. Because cancer treatment entails a wide range of interventions with wide-ranging degrees of toxicity, capturing patient experience and tolerance for various treatment regimens has important implications for a patient's mental well-being, functional capacity, and ultimately, their survivorship experience.

COA strongly supports:

- MUC2023-162: Patient-Reported Pain Interference Following Chemotherapy among Adults with Breast Cancer
- MUC2023-190: Patient-Reported Fatigue Following Chemotherapy among Adults with Breast Cancer.

COA has long engaged community oncology practices in understanding PROMs research issues and ensuring that tools and methods can be scaled for practices of variable size and resources.

For example, through this work, we developed a free, web-based platform available to all practice members to use these measures – not only for breast cancer but all cancers. The Patient-Reported Outcome Measures Oncology (PROMonc) Survey for oncology providers was developed in partnership with the Purchaser Business Group on Health (PBGH). It

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tracks patient outcomes like pain, fatigue, and quality of life. All questions from the survey are sourced from the U.S. Department of Health and Human Services's Patient-Reported Outcomes Measurement Information System (PROMIS).

Patient-reported information in these areas augments available data to affirm their utility for curative treatments. Importantly, building capacity and experience in using PROMs helps position community-based practices to meet the PROs requirements and ensure the entire patient treatment journey is addressed.

COA believes it is important to adopt solutions to ensure consistency and continuity in collecting patient-reported information, minimize the burden of data collection, and collect objective information from patients and services to improve health equity. Ultimately, patient-reported information is also important for use in shared decision-making and engaging patients in treatment choices.

COA appreciates the opportunity to comment as part of the PQM Pre-Rulemaking Measures Under Consideration List Commenting process. We look forward to working with you to further patient-centered policies as well as improved measurement systems to ensure the provision of quality cancer care.

We are available to discuss any of the comments provided in this letter and thank you for your consideration.

Sincerely,



Miriam Atkins, MD, FACP
President



Ted Okon
Executive Director