



September 8, 2023

The Honorable Xavier Becerra
Secretary

U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, D.C. 20201

Chiquita Brooks-LaSure
Administrator

Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Re: CMS-1784-P – Medicare and Medicaid Programs; CY 2024 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Coverage Policies
88 Fed. Reg. 52262 (August 8, 2023)

Dear Secretary Becerra and Administrator Brooks-LaSure:

On behalf of the Association of Oncology Social Workers (AOSW), we appreciate the opportunity to comment on patient illness navigation (PIN) provisions of the CY2024 Centers for Medicare and Medicaid Services (CMS) Physician Fee Schedule proposed rule. Due to social work's significant role in patient navigation, we were pleased by the actions of CMS to help ensure that all patients, but particularly those who have been historically underserved, have access to high-quality, timely, comprehensive cancer care services through the sustainability of the navigation profession.

AOSW is an international nonprofit organization dedicated to the enhancement of psychosocial services to people with cancer, their families and caregivers. Our members include 1,200 oncology social workers who practice in hospitals, outpatient clinics, home care and hospice agencies, community wellness programs, patient advocacy organizations, and other settings. Oncology social workers may also serve as clinical navigators. As outlined in the *Oncology Navigation Standards of Practice (2022)*, an oncology social work navigator is a professional social worker with a master's degree in social work and a clinical license (or equivalent as defined by state laws) with oncology-specific and clinical psychosocial knowledge who offers individual assistance to patients, families, and caregivers to help overcome healthcare system barriers. Using the social work process, an oncology social work navigator provides education and resources to facilitate informed decision-making and timely access to quality health and psychosocial care throughout all phases of the cancer continuum.

AOSW is also an active member in several multi-disciplinary coalitions and initiatives including the National Navigation Roundtable (NNRT) and the Professional Oncology Navigation Task Force. We support the comments letter submitted by both groups.

We appreciate and are encouraged by the work of CMS to help sustain the profession of navigation. As the professional voice of oncology social work and oncology social work navigation, we stand ready to serve as a resource as this work is implemented and as future efforts are undertaken to ensure that all patients can access navigation as a core component of their oncology care. For additional information, please contact us at info@aosw.org or 847-686-2233.

Sincerely,
AOSW

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