



October 21, 2021

National Committee for Quality Assurance
1100 13th St NW 3rd floor
Washington, DC 20005

RE: Healthcare Effectiveness Data and Information Set Measurement Year 2022 Technical Specifications Update – Colorectal Cancer Screening

Dear National Committee for Quality Assurance,

On behalf of Cancer Early Detection Alliance, CEDA, we respectfully submit comments for consideration to the National Committee for Quality Assurance (NCQA) regarding the Colorectal Cancer Screening measure being considered for inclusion in the Healthcare Effectiveness Data and Information Set (HEDIS) Measurement Year (MY) 2022 Technical Specifications Update.

CEDA

CEDA consists of national organizations representing a diverse group of stakeholders, including patient advocacy organizations, healthcare professional societies, and industry leaders. CEDA's mission is to promote and expand access to quality, equitable early cancer detection and care, with a specific focus on reaching underserved communities and addressing racial and ethnic disparities. To this end, we seek to engage patients, providers, and other allies to promote legislation and regulation for the early detection of cancer, remove barriers to cancer care, and support and advance targeted and meaningful funding opportunities geared toward early detection.

Updating the Current Colorectal Cancer Screening HEDIS Measure

CEDA supports NCQA's recommendation to update the 2022 colorectal cancer screening HEDIS measure to be in-line with the American Cancer Society's 2018 recommendation and the United States Preventive Services Taskforce (USPSTF) 2021 recommendation for individuals to be screened beginning at the age of 45. In 2021 USPSTF, an independent professional body that directly influences coverage of preventive services and screenings, issued a B recommendation for screening for colorectal cancer in adults 45–49; finding with moderate certainty that the net benefit of screening adults in this age range is moderate. With the B recommendation, private plans and Medicaid are now required to cover colorectal screening for individuals beginning at the age of 45. NCQA's updated HEDIS measurement would ensure that purchasers and consumers can compare the performance of health plans and quantify the percentage of beneficiaries who have been appropriately screened for colorectal cancer beginning at the age of 45.

Colorectal cancer is the third leading cause of cancer deaths in the U.S. Early detection of colorectal cancer leads to significantly better health outcomes, with ninety percent of individuals who are



diagnosed with colorectal cancer at the earliest stages having a five-year survival rate.¹ Colorectal cancer deaths are dropping in the United States because more individuals are being screened regularly, and having colorectal cancer diagnosed at earlier stages. While colorectal cancer diagnoses have been

decreasing in older individuals, the incidence rate has been increasing for young people, with one in 10 colorectal cancer patients being diagnosed before the age of 50.²³

Supporting the Inclusion of the New Colorectal Cancer Measures in 2022

CEDA also supports NCQA's effort to ensure that the updated colorectal cancer measure that assesses the percentage of members who have been appropriately screened for colorectal cancer from 50–75 years to 45–75 years be included in the 2022 measure year. Ensuring that the edited measure is included in the upcoming measure year can help to encourage health plans to cover colorectal screening for individuals beginning at the age of 45. Swift action by the health plans to ensure covered screening for the 45-49 age group can help to diagnose colorectal cancer at earlier stages, allowing for more treatment options, and ultimately preventing more deaths.

Thank you for the opportunity to provide comments regarding NCQA's recommended update to the Colorectal Cancer Screening measure for the HEDIS Measurement Year (MY) 2022 Technical Specifications. CEDA strongly supports any change that will broaden access to cancer screening as a whole and believe that this measure update is a step in the right direction for ensuring that early cancer screening is available to more individuals. Please contact Peggy Tighe at Peggy.Tighe@PowersLaw.com or Taryn Couture at Taryn.Couture@PowersLaw.com if you have any questions.

Respectfully,

◆ *American Osteopathic Association* ◆ *Colon Cancer Coalition*
◆ *Freenome* ◆ *Guardant Health*
◆ *Prevent Cancer Foundation* ◆ *ZERO - The End of Prostate Cancer*

¹ American Cancer Society (2020). Can Colorectal Polyps and Cancer Be Found Early?

<https://www.cancer.org/cancer/colon-rectal-cancer/detection-diagnosis-staging/detection.html#:~:text=When%20colorectal%20cancer%20is%20found,survival%20rate%20is%20about%2090%25>.

²American Cancer Society (2017). Report: Colon and Rectal Cancer Rates Continue to Drop Among Older Americans <https://www.cancer.org/cancer/colon-rectal-cancer/about/key-statistics.html>

³ Da Silva, et al. (2020). Colorectal cancer in patients under age 50: a five-year experience <https://www.scielo.br/j/rcbc/a/pXZqmpbcdtwbFLz9NDNkQTP/?lang=en>