



November 21, 2024

Submitted electronically via <https://www.womenspreventivehealth.org/public-comment/>

Subject: Notice of Request for Public Comments on Draft Recommendations for the HRSA-Supported Women's Preventive Services Guidelines: Patient Navigation for Breast and Cervical Cancer Screening

Covered California and the California Public Employees' Retirement System (CalPERS) are writing in response to your request for public comment accompanying the Proposed Updates to the Health Resources and Services Administration (HRSA)-supported Women's Preventive Services Guidelines. The comments in this letter refer to the proposed guidelines relating to patient navigation for breast and cervical cancer screening. Separately, we also submitted comments on the proposed updates to screening and counseling for intimate partner and domestic violence and guidelines relating to breast cancer screening for women at average risk.

We fully support the inclusion of patient navigation services in the guidelines. Research demonstrates that these services significantly enhance cancer screening rates and reduce disparities in cancer morbidity and mortality, particularly among low-income and underserved populations. To strengthen their effectiveness, we recommend HRSA provide references and guidance on validated assessment tools, educational materials and navigation models. We also recognize that smaller or resource-limited practices may struggle to hire dedicated navigators. Alternatively, they can refer patients to external organizations, such as the American Cancer Society or local CBOs, which offer navigation services.

We recommend broadening the scope of navigation services to include financial guidance, especially given that inappropriate or excessive out-of-pocket costs and denial of payment for covered preventive services may lead to individuals foregoing important and timely screening and follow-up tests.

Guidance should also emphasize the value of navigators with shared lived experiences and practicing with cultural humility. Cultural concordance between navigators and patients, as well as the availability of culturally appropriate materials, can play a critical role in ensuring that patients feel comfortable and supported throughout their care. Specifying both "language interpretation and translation" services is crucial, as both spoken and written communication must be accessible to all patients.

We also strongly encourage the WPSI coalition align its current guidance on cervical cancer screening with breast cancer screening. This would entail including coverage for additional procedures, such as colposcopy with biopsy, for individuals with abnormal initial cervical cancer screening tests (cytologic or HPV testing) to ensure completion of the screening and diagnostic process in all eligible individuals.

Sincerely,

A handwritten signature in blue ink that reads "Jessica K. Altman".

Jessica Altman  
Executive Director  
Covered California

A handwritten signature in blue ink that reads "Marcie Frost".

Marcie Frost  
Chief Executive Officer  
CalPERS