

The undersigned organizations representing urologists strongly oppose the proposed quality measure: Non-Recommended PSA-based Screening. As physicians who specialize in the management of prostate cancer, we dispute the recommendation on several grounds, both medical and procedural.



Generally, we believe quality measures must demonstrate appropriate consideration of severity, complexity, appropriate indications and outcomes. There is insufficient evidence in the framing document to warrant a wide-reaching recommendation against PSA-based screening for prostate cancer. At minimum, exceptions to this recommendation should also include: ethnicity, family history and testosterone supplementation.

Beyond this contextual dispute, we believe CMS must not implement quality measures and screening recommendations derived without input from specialists in the related health condition. The methodology of determining quality measures should include input from experts in the pathophysiology of the disease state. Mathematica Policy Research has insufficient specialty expertise in prostate cancer and does not solicit input before making their recommendations public. The U.S. Preventive Services Task Force, whose recommendation is heavily relied upon by Mathematica, likewise does not allow specialists a seat at the table as data sets and evidence are being culled through.

The clinical value of prostate cancer screening across a broad age range has been scientifically validated and endorsed by the American Urological Association, American Cancer Society, National Comprehensive Cancer Network, American Society of Clinical Oncology and American College of Physicians-American Society of Internal Medicine. We therefore urge CMS to reject the proposed quality measure: Non-Recommended PSA-based Screening.

Thank you.

Gary M. Kirsh, MD, President, on behalf of the
North Central Section of the AUA

Ronald P. Kaufman, Jr., MD, President, on behalf of the
Northeastern Section of the American Urological Association, Inc.

Leonard G. Gomella, MD, FACS, President, on behalf of the
Society of Urologic Oncology

Mark Austenfeld, MD, Health Policy Council Chair, on behalf of the
South Central Section of the AUA Health Policy Council

Jon S. Demos MD, President, on behalf of the
Southeastern Section of the AUA

Matthew Gretzer, MD, FACS, President, on behalf of the
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David M. Wilhelm, MD, President, on behalf of the
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