June 11, 2014

United States Preventive Services Task Force
540 Gaither Road
Rockville, MD 20850

RE: Draft Research Plan on Screening for Skin Cancer

Dear Task Force members,

I am contacting you on behalf of the more than 13,000 members of the American Academy of Dermatology Association (Academy) to share our comments regarding the draft research plan on skin cancer. The Academy appreciates the opportunity to provide comments to the U.S. Preventative Service Task Force (USPSTF) and we hope the Task Force will take our comments into consideration as it finalizes the research plan.

Unfortunately, skin cancer statistics are frightening and the incidences of skin cancer continue to rise. Melanoma is now the second most common form of cancer for adolescents 15-29 years old. \(^1\) \(^2\) Estimates state that one in five Americans will develop skin cancer in their lifetime.\(^3\) \(^4\) The Academy is committed to educating the public on skin cancer prevention to reduce these alarming statistics. The Academy believes that skin cancer screenings are a vital component of a skin cancer prevention strategy.

**Access to Dermatological Care**

While we recognize that the Task Force is focused on primary care settings as the site of service, we urge the Task Force to evaluate the evidence for screenings by a dermatologist. Dermatologists are trained providers who are educated in detecting and treating early and highly complex skin cancers. With this training and expertise, dermatologists are able to provide comprehensive quality care in an efficient and cost-effective manner. Therefore, we respectfully request that the USPSTF consider expanding the research setting to include dermatology visits and screening programs.

**Age**

The Academy understands that the scope of the research plan will be based on the effectiveness and appropriateness of screenings for adults aged 21 years and older. We note that certain scientific research includes populations under the age of 21 years old. We strongly suggest that the USPSTF does not exclude research that may include populations outside the scope of the Task Force’s primary age group. Additionally, the Academy encourages the Task Force to consider expanding the focused age population to include adolescents and young adults. The latest statistics, referenced above, indicate that skin cancer in this younger segment of the population is becoming more frequent. Therefore, we believe skin cancer

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\(^2\) Cancer Epidemiology in Older Adolescents & Young Adults. SEER AYA Monograph Pages 53-57. 2007.


Screenings for adolescents and young adults will detect skin cancers earlier and will encourage the younger population to make smarter sun behavior decisions.\(^5\) \(^6\)

**Screening Tests**

The Academy appreciates that the Task Force has included tools to aid examinations in the research plan. Some patients may have more complex or higher risks and a thorough evaluation of suspected skin cancer lesions for those patients may warrant the use of additional aids/tools such as total body photography. We respectfully request that the Task Force consider including total body photography in the screening test inclusion criteria.

**Self-screening**

The Academy recognizes that the Task Force is focused on screenings in a clinical setting. However, the Academy has always encouraged our patients to perform self-screenings.\(^7\) \(^8\)

Recognizing the value of self-screenings, we respectfully request that the Task Force clarify their reasons for not including this measure in the research plan. We also encourage the Task Force to reconsider the research plan to include self-screenings.

The Academy commends the USPSTF for its continued commitment to ensure and encourage wellness for the American people. We would like to be a resource to the Task Force as it evaluates the research and drafts recommendations regarding this important topic. Should you require any additional information or clarification, please contact Amanda Grimm, MSHSRA, Manager of Regulatory and Public Policy at agrimm@aad.org or 202-847-3555.

Sincerely,

\[\text{signature}\]

Brett Coldiron, MD
President, American Academy of Dermatology Association

CC: Elaine Weiss, JD, Executive Director
    Barbara Greenan, Senior Director, Government Affairs
    Amanda Grimm, MSHSRA, Manager, Regulatory and Public Policy

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