November 6, 2017

United States Preventative Services Task Force
540 Gaither Road
Rockville, Maryland 20850

Submitted via online submission:

Re: Draft Recommendation Statement: Skin Cancer Prevention: Behavioral Counseling

Dear Task Force Members,

On behalf of the more than 13,500 U.S. based members of the American Academy of Dermatology Association (AADA), I am writing to provide comments regarding the U.S. Preventative Services Task Force (USPSTF) Draft Recommendation Statement on Skin Cancer Prevention: Behavioral Counseling. Given the AADA’s interest in skin cancer prevention and early detection, we appreciate the opportunity to provide feedback on this draft recommendation statement posted online at: https://www.uspreventiveservicestaskforce.org/Page/Document/draft-recommendation-statement/skin-cancer-counseling2. We also submitted a comment letter dated April 13, 2016 on the corresponding draft research plan. This topic continues to be of importance as the AADA is committed to educating the public on skin cancer prevention. We commend USPSTF expanding its proposed recommendation to counsel young adults, adolescents, children, and parents of young children about minimizing exposure to ultraviolet radiation for fair-skinned persons ages 6 months to 24 years to reduce their risk of skin cancer and have the following recommendations to clarify and improve this recommendation statement.

AADA recommends that USPSTF clarify the definition of secondary prevention in this recommendation especially as it relates skin self-evaluation (SSE). The draft recommendation states: “The USPSTF concludes that the current evidence is insufficient to assess the balance of benefits and harms of counseling adults about skin self-examination to prevent skin cancer.” While SSE would not result in decreased incidence of skin cancer and this recommendation statement appears to be more focused on primary prevention counseling, it is important for early detection
and treatment by a board-certified dermatologist. AADA recommends that USPSTF revise this statement accordingly and that the title of this recommendation statement be changed to “Behavioral Counseling for Skin Cancer Prevention and Patient Detection.”

Related to SSE, AADA asks for inclusion of recommended counseling on SSE and partner-assisted SSE training for patients at a high risk of developing a melanoma.\(^1\),\(^2\) Any harms associated with SSE are short-lived, whereas benefits of ongoing SSE are long-lived.\(^3\) Early detection coupled with seeking care and receiving treatment may result in improved survival.\(^4\),\(^5\),\(^6\)

USPSTF proposes a grade of “C”, specifically that: “The USPSTF recommends that clinicians selectively offer counseling to adults who have fair skin and are older than age 24 years about minimizing their exposure to ultraviolet radiation to reduce risk of skin cancer. Existing evidence indicates that the net benefit of counseling all adults older than age 24 years is small. In determining whether this service is appropriate in individual cases, patients and clinicians should consider the presence of risk factors for skin cancer.” It is unclear from the draft recommendation statement where the cutoff at age 24 years resulted given that most trials included adults with broad age criteria that would all benefit from skin cancer counseling especially from sunscreen education. Also, it is unclear why the grade proposed is only a “C” given the forest plot pages 52-53 as well as the proven benefits of sunscreen use seen in the studies cited. This evidence would support at least a “B” grade.

AADA continues to advocate for sunscreen use for all, regardless of age, gender, race, or skin type. This advocacy focuses on the adoption of state-wide and school district-wide policies that allow students to use sunscreen and articles of sun protective clothing during the school day without physician authorization. It also includes support for these same policies for summer camps. This recommendation statement can help influence these advocacy efforts given the importance of skin cancer prevention for school-aged children.

The Academy applauds USPSTF for its continued commitment to ensuring and encouraging wellness for the American people. We would like to be a resource to the Task Force as it finalizes its recommendation statement regarding this important topic. Please contact Natasha Pattanshetti, JD, MPH, Manager, Regulatory Policy at npattanshetti@aad.org or (202) 712-2618 should you have any additional questions.

Sincerely,

Henry W. Lim, MD, FAAD
President

cc: Suzanne M. Olbricht, MD, President-elect
    Elaine Weiss, JD, CEO & Executive Director
    Barbara Greenan, Senior Director, Advocacy and Policy
    Leslie Stein Lloyd, JD, Director, Regulatory and Public Policy