



Centers for Disease Control
and Prevention (CDC)
Atlanta GA 30341-3724

September 4, 2009

Mr. Patrick McConnon, MPH
Executive Director
Council of State and Territorial Epidemiologists
2872 Woodcock Boulevard, Suite 303
Atlanta, Georgia 30341

Dear Mr. McConnon:

I am responding to your letter to Dr. Thomas Frieden regarding the Council of State and Territorial Epidemiologists (CSTE) position statement "Public Health Reporting and National Notification for Cancer and Central Nervous System Tumor Incidence and Mortality."

The Division of Cancer Prevention and Control, National Center for Chronic Disease Prevention and Health Promotion, has reviewed the above mentioned position statement and offer the following comments:

- Page 3, paragraph 1 and Page 6, Section VII.A., Paragraph 2: The sentences that state where cases should be transmitted currently read "... to the appropriate central cancer registry, or the state health department or its designee." This seems to imply that it's either the central cancer registry (CCR) or the state health department. CCRs may not always be in health departments where public health reporting typically occurs. Suggest changing sentences to read: "... to the appropriate central cancer registry (health department or its designee)."
- Page 3, *Data to be collected*: Add at the end of the 1st sentence "... as specified in Title III of the Public Health Service Act, Section 399H." Also, please add a 5th bullet "To the extent such information is available in source records, information on the industrial or occupational history of the individual." This requirement is specified in the PHS Act.
- Pages 5 and 6: Suggest deleting the following sentences as the criteria in the tables have been in use for some time by registries for receiving data from reporters so there should be no reason to evaluate before general implementation.
 - Page 5, Table VI-B, delete: "The following criteria are proposed for evaluation before general implementation. For purposes of currently implementing reporting the narrative description in VI-A, should be used."
 - Page 6, Table VII-B, delete: "The following criteria are proposed for evaluation before general implementation. For purposes of current notification, the narrative description in VII-A, should be used."

- Page 6 (top of page), Section VI. Criteria for Reporting, C. Disease Specific Elements, please add the following paragraph: “If available, the data elements “usual occupation” and “usual industry” are required for cancer registry reporting to CDC-NPCR but are challenging to collect in the current environment. Incorporation of these data elements and associated software tools into the Electronic Health Record (EHR) will help cancer registries and other public health domains collect more complete and better quality information on patients’ occupation and industry. This position statement supports the development of EHR standards for collection of these data elements to improve data quality and completeness.”
- Page 7, IX Data sharing/release and print criteria, 1st sentence: “Notification to CDC of confirmed cases of cancer is recommended.” Suggest changing the word “recommended” to “required” as it is a requirement.

We appreciate the opportunity to review the CSTE position statement and look forward to our continued collaboration.

Sincerely,



Marcus Plescia, M.D., M.P.H.
Director
Division of Cancer Prevention and Control
National Center for Chronic Disease Prevention
and Health Promotion