The Centers for Medicare & Medicaid Services Will Pay for Patient Navigation—Now What?
The evidence is overwhelming that patient navigation improves access to care and health outcomes for patients with cancer. Following decades of research demonstrating the efficacy of patient navigation on clinical and patient-reported outcomes, the Centers for Medicare & Medicaid Services (CMS) issued a final rule that pays for patient navigation and navigation-related services effective January 1, 2024. This article reviews the new codes to reimburse for principal illness navigation (PIN) services, social determinants of health assessment, community health integration, and PIN-Peer Support. A description of the codes, how to use them, who can perform services, and next steps for the field are reviewed.

In Brief
Following decades of research demonstrating the efficacy of patient navigation on clinical and patient-reported outcomes, the Centers for Medicare & Medicaid Services (CMS) issued a final rule that pays for patient navigation and navigation-related services effective January 1, 2024. This article reviews the new codes to reimburse for principal illness navigation (PIN) services, social determinants of health assessment, community health integration, and PIN-Peer Support. A description of the codes, how to use them, who can perform services, and next steps for the field are reviewed.

What Are the New Billable Services?
CMS created new codes to reimburse for the support services needed to assist patients with health-related social barriers that interfere with treatment adherence for cancer and other serious illnesses. The rule includes several types of reimbursement under the supervision of a qualifying billing practitioner. These include:

- Social determinants of health (SDOH) risk assessment
- Community health integration (CHI) service coordination responsive to SDOH assessment
- PIN (principal illness navigation) services to help patients complete a treatment plan for a serious condition expected to last at least 3 months
- Principal illness navigation—Peer support (PIN-PS) that aligns with rigorous training, primarily for behavioral health support, such as peer-led mental health and substance use programs under the Substance Abuse and Mental Health Services Administration.

Services that are necessary to help improve adherence to treatment plans that are typically provided by oncology patient navigators and community health workers are now reimbursable as PIN services. The rule provides a number of examples of qualifying activities, including provision and facilitation of:

- Person-centered assessments, which involve assessing how SDOH might affect a person’s health care adherence and outcomes
- Patient-driven goals of care
- Care planning
- Care coordination
- Communication, including in-system navigation and coordination of community-based care
- Health education
- Coaching and mentoring to support patient self-advocacy
- Collection of health outcomes data.
Who Can Provide Services?

CMS uses various codes for billing, including Current Procedural Terminology (CPT) codes for medical procedures and services and G-codes for functional limitation reporting. The new G-codes for PIN may be used by anyone performing these services, provided they are appropriately trained. However, CMS does not endorse any specific organization, certification process, or credential, deferring to state-based credentialing requirements where they exist.\(^5\)

The rule defines patient navigation, “in the context of healthcare” as “individualized help to the patient (and caregiver, if applicable) to identify appropriate practitioners and providers for care needs and support, and access necessary care timely… and includes identifying or referring to appropriate supportive services.”\(^5\) While advance care planning, chronic care management, behavioral health, psychiatric care, transitional care, and home health and hospice supervision were already reimbursable services, the new codes effective January 1, 2024 are specifically for patient navigation services not previously covered.

These codes can be used by any staff performing eligible services (SDOH assessment, CHI, PIN, PIN-PS), including nurses, social workers, as well as oncology patient navigators who are based in clinic or in community settings, community health workers, and other auxiliary personnel.\(^5\) The codes do not specify any particular role or profession. Recognizing that social needs have a major influence on access to and completion of cancer care, the new rule provides two new G-codes for CHI services that can be performed by appropriately trained personnel, including community health workers and navigators, to assess and address patient SDOH affecting a practitioner’s ability to diagnose or treat a major illness. An initial CHI assessment by the billing practitioner (\(G0023\)) is required before follow-up CHI services by non-clinical, auxiliary staff can use code \(G0024\) as “incident to” billing under the practitioner who performed the initial assessment.\(^5\)

How Do I Bill for Navigation Services?

To bill for PIN services, the person being navigated must have a health condition that the practitioner expects to require management for at least 3 months. PIN services can be performed by a patient navigator, community health worker, or other auxiliary staff member working on a health care team or under an agreement with a health care practice, if there is a supervising practitioner. Besides physicians, clinicians that qualify as supervising practitioners vary based on state scope of practice laws for advanced practice registered nurses (APRNs) and physician assistants (PAs).\(^5,12\) In addition to PIN services, codes for CHI services, PIN-PS, and SDOH assessment are also new (Table 1).

Documentation for CHI, PIN, and SDOH risk assessment must include time spent providing services, documentation of patient consent (which can be verbal), description of services performed, and associated ICD-10, ICD-10 Z, and G-Codes.\(^5,11\) The initiating visit can be an office visit or an annual wellness visit.\(^5\)

Importantly, patient consent is required for CHI and PIN services as there is cost-sharing associated with all Medicare billing. Standard cost-sharing for Medicare is 20% after the deductible has been met. Medicare Advantage beneficiaries are responsible for coinsurance after the deductible has been met. Consent may be obtained by auxiliary personnel, including a navigator, nurse, or social worker. Only 1 practitioner a month may bill. If this provider changes, another consent must occur.\(^5\)

CMS requires institutions to document credentialing first based on existing individual state requirements. CMS also requires documentation of sufficient knowledge for practice, which state requirements would not necessarily demonstrate.

It is important to note that these new codes do not replace codes for Chronic Care Management (\(99437, 99439, 99440, 99491\)), Complex Chronic Care Management (\(99487, 99489\)), and Principal Care Management (\(99424-99427\))\(^5,11\)

Nor do these codes replace health behavior assessment and intervention services that can be provided by clinical social workers and other trained mental health professionals (\(96156, 96158, 96159, 96164, 96165, 96167, 96168\)).

In addition to the new CHI, PIN, PIN-PS, and SDOH codes, the 2024 MPFS rule also includes codes for group behavior training (\(96202, 96203\)), caregiver training to facilitate in-home and community-based supports (\(97550, 97551\)), and group caregiver training (\(97552\)).\(^13\) In addition, while \(G0511\) previously could be used for general care management from Federally Qualified Health Centers, starting January 1, 2024, remote patient monitoring (RPM) is also acceptable.\(^12\)

Finally, the 2024 MPFS rule delayed any permanent decision about virtual supervision (telehealth) established under the Consolidated Appropriations Act of 2023, extending approval for telehealth services through December 31, 2024.\(^13\)

How Much is Reimbursement?

CY 2024 rates for select codes are included in Table 1. The American Society of Clinical Oncology (ASCO) also publishes a reimbursement breakdown by for various services.\(^12\) Given that these rates will change each calendar year, we refer
readers to the ASCO annual updates for guidance on future reimbursement rates.¹¹

**Navigator Credentialing**

Credentialing can be confusing. Regardless of the auxiliary health personnel title or professional role, CMS requires institutions to document credentialing first based on existing individual state requirements.¹⁴,¹⁵ For example, New Mexico has existing state requirements for community health worker training and practice with oversight from the New Mexico Department of Health, Office of Community Health Workers.¹⁶,¹⁷ Community health worker certification costs about $100 and requires either: 1) completion of a specific training provided by the New Mexico Department of Health or from an approved Department of Health training partner along with field experience.

### TABLE 1. PATIENT NAVIGATION-RELATED G-CODES AND 2024 MEDICARE RATES FOR SELECT SERVICES

<table>
<thead>
<tr>
<th>Code</th>
<th>How to Use</th>
<th>2024 Rate¹²</th>
<th>Minimum Time to Bill</th>
<th>Training Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>G0136</td>
<td>Risk Assessment based on a practitioner’s reason to believe there are unmet SDOH needs, not intended for routine screening for patients at every visit or for every patient. Typically not administered in advance of the visit. If conducted during an annual wellness visit, cost-sharing does not apply. If conducted at a visit for any other reason, cost-sharing applies. CMS does not require a particular tool, but cites the CMS Accountable HealthCommunities Tool and Protocol for Responding to &amp; Assessing Patients’ Assets, Risks &amp; Experiences (PRAPARE) as appropriate tools. This code is permanently added to telehealth visits, as well.</td>
<td>$18.67</td>
<td>5-15 minutes not more than every 6 months per practitioner per beneficiary</td>
<td>State-based requirements OR documentation of key competency domains</td>
</tr>
<tr>
<td>G0019</td>
<td>Community Health Integration (CHI) initiating visit with assessment by a clinical health worker under the direction of a billing practitioner to document and address SDOH needs that significantly interfere with a patient’s ability to complete diagnosis or treatment of the chronic health condition. Examples of CHI services include person-centered care planning, health system navigation, referral and coordination to community-based resources, care coordination, and patient self-advocacy promotion.</td>
<td>$78.92</td>
<td>60 minutes (once/month)</td>
<td>State-based requirements OR documentation of key competency domains</td>
</tr>
<tr>
<td>G0022</td>
<td>CHI services to address SDOH needs that are significantly interfering with a patient’s ability to complete diagnosis or treatment of the chronic health condition after an initial assessment under supervision of a billing practitioner.</td>
<td>$49.45</td>
<td>Additional 30-minute increments (unlimited)</td>
<td>State-based requirements OR documentation of key competency domains</td>
</tr>
<tr>
<td>G0023</td>
<td>Initial person-centered assessment for PIN services: should assess SDOH, facilitate patient-driven goal setting, and establish an action plan for tailored support. Support can include coordination of community-based services and care transitions; health education; patient self-advocacy skill coaching; active navigation of the health care system; facilitating behavior change; providing social and emotional support; mentorship; and inspiration to help patients meet treatment goals.</td>
<td>$78.92</td>
<td>First 60 minutes per calendar month (once/month)</td>
<td>State-based requirements OR documentation of key competency domains</td>
</tr>
<tr>
<td>G0024</td>
<td>PIN services after the initial assessment is billed using G0023. Note that “incident to” billing can be used for services provided by navigators working within the cancer care setting, but also for navigation conducted external to the cancer care setting with appropriate agreements with trained staff at community-based organizations. Clear integration of community-based services with the supervising practitioner are required for billing.</td>
<td>$49.45</td>
<td>Additional 30-minute increments per calendar month (unlimited)</td>
<td>State-based requirements OR documentation of key competency domains</td>
</tr>
<tr>
<td>G0140</td>
<td>PIN services by peers—intended for mental and substance abuse support based on training from SAMHSA.</td>
<td>$78.92</td>
<td>First 60 minutes per calendar month (once/month)</td>
<td>SAMHSA standards⁶</td>
</tr>
<tr>
<td>G0146</td>
<td>PIN services by peers - intended for mental and substance abuse support based on training from SAMHSA.</td>
<td>$49.45</td>
<td>Additional 30-minute increments per calendar month (unlimited)</td>
<td>SAMHSA standards⁶</td>
</tr>
</tbody>
</table>
or 2: 2,000 hours of experience in the last 2 years plus 2 letters of reference. Although CMS does not require field experience, the State of New Mexico Community Health Worker Certification does require field experience within the structure of approved training programs. University and community college-based approved trainings have required practicums or clinical agency components.16-17

It is unclear if navigators seeking to be newly credentialed in New Mexico would need field hours in addition to training if that training is obtained outside of the approved list of New Mexico Department of Health, Office of Community Health Workers programs. Certification regulations for community health workers imply that navigators seeking to be credentialed in New Mexico must look to satisfy the state’s requirement and have some field-based experience.17-18 While a patient navigator completing the community health worker certification in New Mexico would be satisfying the minimum requirement credentialing, CMS also requires documentation of sufficient knowledge for practice, which state requirements would not necessarily demonstrate.18-19

Effective, consistent navigation services elevate the reputation of a cancer program or practice and can potentially save institutions money. Navigation is optimal when its delivery is cost-effective, time-efficient, and compassionate.

In another example from the state of California, Medi-Cal covers community health worker services to help control and prevent chronic, infectious, mental health, perinatal, sexual, reproductive, and other conditions with a written recommendation from a supervising practitioner.20 California requires community health workers to share lived experience with the population being served and complete an approved curriculum that comes with a certificate of completion. Community health workers may practice for a maximum of 18 months under a supervising practitioner without a certificate of training if the community health worker can demonstrate appropriate skills and document 2,000 hours of work, including paid or volunteer roles, within the previous 3 years. All community health workers must complete 6 hours of continued education training annually.20 Unlike many other states, California also specifies that “health navigators, health coaches, community outreach workers, recovery specialists, and family support workers” fall under the same credentialing requirements as community health workers.21

In states that do not specifically include “navigators” within the definition of community health workers for payment credentialing, it is currently unclear whether navigators with a more focused scope of practice are required to fulfill state-specific community health worker requirements.22 We do, however, know that obtaining community health worker credentialing based on state requirements and documenting training in appropriate competencies for the oncology navigator role should be sufficient. Specific competencies that must be met include: “patient and family communication, interpersonal and relationship-building, patient and family capacity building, service coordination and systems navigation, patient advocacy, facilitation, individual and community assessment, professionalism and ethical conduct, and the development of an appropriate knowledge base, including specific certification or training on the serious, high-risk condition/illness/disease addressed in the initiating visit.”5 p. 359

Cancer programs and practices can comply with the rule by documenting that navigators have successfully completed training that meets these competencies (Table 2).

The GW Oncology Patient Navigation Training: The Fundamentals (Principal Investigator: Pratt-Chapman) was created and maintained with support from the Centers for Disease Control and Prevention (cooperative agreements #NU38DP004972, #5NU58DP006461, and #NU58DP007539) and has been available since 2015 at bit.ly/PNTraining. Other excellent state-based or national trainings—with or without a fee—also meet CMS training requirements.21 Additionally, Gallaudet University Center for Deaf Health Equity has a patient navigation curriculum for speakers of American Sign Language adapted from the GW Cancer Center Oncology Patient Navigator Training: The Fundamentals. This curriculum is currently in use for a clinical trial but is not yet publicly accessible.

Training to Provide Affirming Care to Priority Populations

CMS acknowledges that navigation is most effective when focused on populations that have the greatest need for support. In addition to navigation basics, CMS requires that navigators have content specific knowledge relevant to the type of navigation services they will perform. In the ACCURE Trial,22 for example, navigators also had critical racial health equity training. Myriad of health equity resources are available, including from the CDC’s funded National Networks.23 In addition to having a strong foundation of cancer patient navigation knowledge, deeply understanding the community being served is critical to effectively navigating patients and families. See Table 3 for training resources on priority populations.

Training is not the only way to demonstrate appropriate expertise for a navigator’s knowledge for practice. In 2008, the National Consortium of Breast Centers began providing certification for certain types of breast cancer navigation. In 2020, AONN+ inaugurated the Oncology Patient Navigator – Certified Generalist credential (OPN-CG). Both credentials are helpful to document appropriate knowledge for practice in serving a specific patient population. Supplemental knowledge resources specific to cancer basics are offered from the National Cancer Institute (cancer.gov), the American Society of Clinical Oncology (cancer.net), and the American Cancer Society (cancer.org). For licensed clinical professionals, the authors anticipate that social work licensure and nurse licensure should be sufficient documentation of training given the heightened rigor of these credentials. We will collectively benefit from lessons learned and shared across navigating roles as institutions begin to pilot and roll out billing for PIN services.
### Beyond Training: Navigator Professional Development, Program Implementation, and Evaluation

Training is the start, not the end of strong navigation. Expertise in navigation requires ongoing personal and professional development from navigators eager to learn and seek out reliable information such as core competencies for community health workers\(^1\) and oncology patient navigators\(^2\), as well as the Oncology Navigation Standards of Professional Practice.\(^3\) Navigators should understand the complexities of the health sequelae and social conditions faced by their patients. Effective navigators have strong relationship and...
<table>
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<tr>
<th>Focused Content</th>
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<th>Type of Resource</th>
<th>Scope</th>
<th>Additional Information</th>
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<tr>
<td></td>
<td>Susan G. Komen</td>
<td>Online training</td>
<td>Training aligned with CMS requirements plus additional breast-cancer specific lessons.</td>
<td>More information: <a href="https://www.navigatorcertifications.org">https://www.navigatorcertifications.org</a></td>
</tr>
<tr>
<td>Black, Latino, LGBTQI persons</td>
<td>GW Cancer Center Together-Equitable-Accessible-Meaningful (TEAM) Training</td>
<td>Online training</td>
<td>Training that aims to assist healthcare teams in identifying and implementing changes to advance health equity in black, Latino/a/x, and LGBTQI populations.</td>
<td>Free, self-paced, online. Access at <a href="bit.ly/GWCCTEAMtraining">bit.ly/GWCCTEAMtraining</a></td>
</tr>
<tr>
<td>Deaf, Deaf-Blind, Hard of Hearing persons that use American Sign Language</td>
<td>Center for Deaf Health Equity, Gallaudet University</td>
<td>Online training</td>
<td>Training specifically focused on health disparities of people who are deaf and hard of hearing.</td>
<td>In development, will be made available for continuing education.</td>
</tr>
<tr>
<td>Elderly persons from 13 diverse ethnic backgrounds</td>
<td>Stanford Internet-Based Successful Aging (SAGE)</td>
<td>Online training</td>
<td>Training to improve quality of life and care for older persons of diverse backgrounds.</td>
<td>Free, but limited capacity. Includes community of practice with secure interaction forum and dialogue. Access at <a href="https://geriatrics.stanford.edu/about.html">https://geriatrics.stanford.edu/about.html</a></td>
</tr>
<tr>
<td>Native American and Alaska Native persons</td>
<td>Native American Cancer Research Corporation</td>
<td>Virtual and in-person training</td>
<td>Addresses cultural and political issues that impact navigation across the cancer continuum for Indigenous populations.</td>
<td>Cost associated. Modules are competency-based and include personal skills assessment. Ranges from 80-200 hours based on number of modules and tailoring. Access at <a href="https://natamcancer.org/Patient-Navigator-Training">https://natamcancer.org/Patient-Navigator-Training</a></td>
</tr>
</tbody>
</table>
team-building skills; assess community resources to ensure responsiveness and credibility of services; and are consistent in their delivery of navigation services to build trust with patients, caregivers, and clinicians. Effective, consistent navigation services elevate the reputation of a cancer program or practice and can potentially save institutions money. Navigation is optimal when its delivery is cost-effective, time-efficient, and compassionate. Professional development, continuing education, and mentorship are critical to supporting the health and growth of the patient navigation workforce. Finally, the scope of navigator practice should be appropriate to licensure, training, and experience.  

Successful navigation programs require strategic integration of key stakeholders and information technology (IT) support. Focused implementation of risk-stratified patient navigation responsive to specific patient populations and care contexts, as well as IT support to chart, track, and evaluate navigation, are key for optimal program impact.  

Successful pre-implementation planning includes these 4 key steps:  
- Convening IT and administrative leaders to build new G-Codes into the electronic health record (EHR)  
- Tracking navigation activities either within or outside of the EHR  
- Optimizing patient demographic data to stratify outcomes  
- Pilot testing the billing of new codes prior to full implementation.  

Early engagement of key stakeholders will improve the incorporation of patient navigation data, streamlining workflows and enhancing reporting capabilities. Recommended key stakeholders to engage include billing specialists, the compliance team, data analysts, and informatics specialists. A practical guide published by the Association of Community Cancer Centers (ACCC) that was cited by CMS in the 2024 MPFS rule provides guidance on refining the focus of a navigation program as well as models and workflows.  

A critical part of patient navigation implementation is outcomes tracking. The ACCURE Trial, which eliminated health outcome disparities between White and Black patients with breast and lung cancer, matched their navigation intervention with rapid data reporting through clinical quality dashboards that allowed practitioners to see disparities in real time. The GW Patient Navigation Barriers and Outcomes Tool (PN-BOT) is a free resource for case management and data tracking. While this tool is limited to 1 user and is not integrated into EHRs, the software can be adapted to customize an EHR, and EHR vendors may have examples of templates that have worked to document navigation in various settings. Investments in commercial software and/or tailored EHR fields that support case management and data tracking may help navigators be most efficient and accurate with documentation critical for billing.  

**Next Steps for the Field**  
First, future research should include analyses of which states include navigators under the community health worker terminology for purposes of payment credentialing as well as the degree to which state-level requirements for community health worker credentialing fit with oncology patient navigators’ scope of practice. Studies on implementing the payment codes, including barriers, facilitators, and lessons learned will also be valuable.  

Second, the workforce of community health workers and navigators cannot be sustained without skills-based pay that reflects the experience, knowledge, and expertise of those performing navigation services. Additionally, skills-based pay is essential to avoid the common paradox of an inequitably paid community health worker or health navigator that struggles to pay for basic life expenses while helping patients access much-needed resources. It also should be emphasized that the degree to which current reimbursement rates are sufficient to cover the salary and programmatic costs of providing community health worker and patient navigation services is yet to be determined. More research is needed to optimize appropriate reimbursement rates for patient support that optimally advances health equity based on patient need, navigator training and experience, and costs of providing services.  

Third, while these new codes are an important step forward for navigation sustainability, cost-sharing is a real and serious limitation for patients. Based on current CMS policy, patients will need to consent to PIN services, since there will be a 20% cost-share. There is a real risk that those individuals most in need of services could decline assistance due to inability to pay. Additionally, cost-sharing will likely come as a surprise to patients who previously received navigation services free of charge. The field will benefit from research describing reasons for and extent of patient non-consent for services and the amounts patients pay due to cost sharing. Advocacy to close the cost-share gap as well as proactive philanthropy to cover costs for needy patients should be pursued and lessons learned shared with the field.  

Fourth, feasibility of effective caseload management that supports the health of patients and the navigation workforce should be further studied to ensure appropriate expectations. Appropriate caseload management can be achieved using an acuity-based-case weight system. This system provides for equitable distribution of community health worker and patient navigator caseloads considering the navigator’s time allocation based on individual patient needs, severity of illness, and social determinants. Smaller caseloads are needed for more complex navigation—such as support for patients who have been historically excluded, marginalized, stigmatized, and/or traumatized. These individuals are more likely to have significant and numerous barriers to care, necessitating more time and resources from the auxiliary health professional to find culturally, economically, legally, and socially-affirming supports.  

Fifth, ongoing training, support, mentorship, and counseling for navigation roles on the front line of care should be prioritized, and best practices to accommodate navigators with disabilities should be shared and implemented. As the navigation workforce continues to professionalize, ongoing training and education should support deepening the proficiency of navigators beyond the baseline required by CMS. Institutions should also seek to model supports that allow navigators to actualize their own optimal health while assisting those in need.
Finally, while payment for patient navigation is a thoughtful and laudable start to support much needed health-related social needs support to people affected by cancer and other serious illnesses, future research on barriers and facilitators to implementation of the new G-codes for SDOH, CHI, PIN, and PIN-PS will be needed to share lessons learned for cancer programs and practices in the years to come.

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References


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Additional Resources
GW School of Medicine & Health Sciences. 2021 Updates to the Oncology Patient Navigator Training.

GW School of Medicine & Health Sciences. Financial Navigation Lesson for Oncology Patient Navigators.

GW School of Medicine & Health Sciences. Patient Navigation Guide (English and Spanish) and Companion Resources.

GW School of Medicine & Health Sciences. Reducing Financial Toxicity: Tips for Patient Navigators.

GW School of Medicine & Health Sciences. Advancing the Field of Cancer Patient Navigation: A Toolkit for Comprehensive Cancer Control Professionals.

GW School of Medicine & Health Sciences. Patient Navigation Barriers and Outcomes Tool (PN-BOT).

GW School of Medicine & Health Sciences. Implementing the Commission on Cancer Standard 8.1 Addressing Barriers to Care.


