

September 28, 2015

Tamara Syrek Jensen, JD
Director, Coverage and Analysis Group
Center for Clinical Standards and Quality
Centers for Medicare & Medicaid Services
7500 Security Blvd.
Baltimore, MD 21244

Dear Ms. Jensen:

The undersigned organizations are writing to express our deep concern with the postponement by the Centers for Medicare & Medicaid Services (CMS) in reviewing our request for a Medicare National Coverage Determination (NCD) for hepatitis B (HBV) screening of at risk individuals. While we recognize the internal capacity issues at CMS, we are troubled by the impact of such a delay on the lives of Medicare beneficiaries who are unaware they are living with a life-threatening disease

In May 2014, the U.S. Preventive Services Task Force (USPSTF) updated its hepatitis B screening recommendations, issuing a “B” grade (recommended) for testing high risk adults, including those born in countries and regions with a high prevalence of HBV infection ($\geq 2\%$); people born in the United States who were not vaccinated as infants and whose parents were born in a region with a very high prevalence of hepatitis B infection ($\geq 8\%$), such as sub-Saharan Africa, and southeast and central Asia; HIV-positive individuals; injection drug users; men who have sex with men and household members and sexual partners of people who are HBV infected.

The revised USPSTF hepatitis B screening recommendations are a significant advance in efforts to identify those with chronic HBV and link them to care. However, a vital component in implementing these recommendations is ensuring coverage from public and private payers. The lack of Medicare coverage for HBV screening harms our ability to identify the estimated 67% of individuals who don't know they have chronic HBV, leaving them at great risk for advanced liver disease, liver cancer, and/or the need for a liver transplant. Furthermore, given the disproportionate impact of hepatitis B on Asian and Pacific Islander Americans, lack of screening coverage continues staggering health disparities already experienced by these communities.

Adoption of USPSTF's revised grade for HBV testing would allow Medicare to play a crucial role in helping to identify those who are unaware they are HBV positive. Of the identified and reported cases of HBV in the U.S. between 2007 and 2012, 15.6% were over the age of 65 and part of the Medicare covered population. Seniors who are Medicare beneficiaries and are unaware of their HBV infection are likely to have been living with the disease for a very long

time - it is vital to ensure they are linked to care and treatment before they develop advanced liver disease or liver cancer. Additionally, those with end stage renal disease are at higher risk for HBV infection and are less likely to respond to the HBV vaccine; individuals in this category would benefit greatly from screening and subsequent linkage to care.

By including the USPSTF hepatitis B screening recommendations under Medicare Preventive Services, CMS would align its policy not only with the science, the Centers for Disease Control and Prevention (CDC) and the USPSTF screening recommendations, but also with the goals of the U.S. Department of Health and Human Services' Action Plan for the Prevention, Care, and Treatment of Viral Hepatitis, and would lead to improved health outcomes for Medicare beneficiaries, many of whom face significant disparities in health care.

We strongly urge CMS to initiate a National Coverage Determination process for HBV screening of high-risk adults. Please let us know if you need any additional information or if we can help expedite this process. If you have any questions, or need additional information, please contact Chari Cohen at (215) 489-4900 or chari.cohen@hepb.org or Ryan Clary at (202) 407-2391 or rclary@nvhr.org.

Sincerely:

Association of Asian Pacific Community Health Organizations (AAPCHO)
Hep B United
Hepatitis B Foundation
National Task Force on Hepatitis B: Focus on Asian and Pacific Islander Americans
National Viral Hepatitis Roundtable

Co-signed:

30 for 30 Campaign
ADAP Advocacy Association (aaa+)
Africans for Improved Access
African Services Committee
AIDS United
American Association for the Study of Liver Diseases
American Liver Foundation
Asian American Health Coalition (HOPE Clinic)
Asian American Research Center on Health (ARCH)
Asian Health Center – St. Barnabas Medical Center
Asian Health Coalition

Asian Pacific Community in Action
Asian Pacific Liver Center
Asian Pacific Health Foundation
Asian Services in Action (ASIA)
Association of Asian Pacific Community Health Organizations (AAPCHO)
California Center for Rural Policy, Humboldt State University
California Hepatitis Alliance
Caring Ambassadors Program
Charles B. Wang Community Health Center
Chinese American Medical Society – Greater Boston Chapter
CHIPO: The Coalition Against Hepatitis for People of African Origin
CHOW Project
Cincinnati Exchange Project
CISC
Community Access National Network (CANN)
Dallas – Ft. Worth Hepatitis B Free Project
Filipino American Community Health Initiative of Chicago (FACHIC)
Frederick County Hepatitis Clinic, Inc.
Global Liver Institute
Harm Reduction Coalition
Hep B Free Las Vegas
Hep B Free Los Angeles
Hep B Project
Hep B United Philadelphia
Hep B United Twin Cities
Hep C Alliance
Hep C Connection
Hepatitis B Coalition of Washington
Hepatitis B Initiative of Washington, DC
Hepatitis C Association
Hepatitis C Support Project
Hepatitis Education Project
Hepatitis Foundation International, Inc.
HIV Medicine Association
International Community Health Center (ICHC)
Lao Assistance Center of MN
Laotian American National Alliance, Inc. (LANA)
Life Beyond Hepatitis C. com
MESA Public Health Associates
Midwest Asian Health Association

Multicultural AIDS Coalition
National Alliance for Medication Assisted Recovery
National Alliance of State and Territorial AIDS Directors (NASTAD)
National Asian American Pacific Islander Mental Health Association
National Asian Pacific American Families Against Substance Abuse
National Association of County and City Health Officials (NACCHO)
National Center for Transgender Equality
New Jersey Hepatitis B Coalition
North East Medical Services
NYC Hepatitis B Coalition
NYU Center of the Study of Asian American Health
Ohio Asian American Health Coalition
Project Inform
Project Prevention
Southern Arizona AIDS Foundation
Tacoma-Pierce County Health Department
The AIDS Institute
The Hepatitis C Mentor and Support Group (HCMSG)
TheSTDProject.com
Treatment Action Group
Trust for America's Health
Vietnamese American Medical Association (VAMA)
Vietnamese Community Health Promotion Project
Vietnamese Social Services of Minnesota
Working Partnerships USA