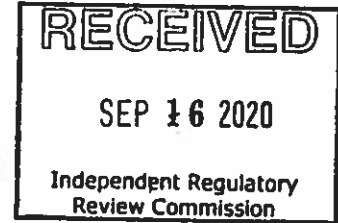




AIDS Free Pittsburgh – An Allegheny County Initiative  
EQT Plaza, 625 Liberty Avenue, Suite 2500, Pittsburgh, PA 15222  
Phone: 412-586-6706  
Email: [info@aidsfreepittsburgh.org](mailto:info@aidsfreepittsburgh.org)  
Website: <http://aidsfreepittsburgh.org>

# 3235

September 16, 2020



Pennsylvania Independent Regulatory Review Commission (IRRC)  
333 Market St.  
14th Floor  
Harrisburg, PA 17101

**RE: Proposed Regulation #10-209: Complete Reporting of CD4 T-Lymphocyte, Viral Load and Genotyping Test Results Relating to HIV**

Dear IRRC Commissioners,

The members of the AIDS Free Pittsburgh initiative and the Southwestern Pennsylvania Ryan White Collaborative support for the Pennsylvania Department of Health’s proposed regulation requiring the reporting of CD4+ counts and HIV viral load results. AIDS Free Pittsburgh is a collaborative public health initiative that aims to end the HIV/AIDS epidemic in Allegheny County, Pennsylvania. Since 2015, this collective has been working to normalize routine HIV screening, facilitate immediate linkage to care for persons out-of-care or newly diagnosed with HIV, and increase access to biomedical HIV prevention tools. This “getting to zero” model has been inspired by similar projects in other cities, counties, and states as well as the national Ending the HIV Epidemic strategy and global Fast Track initiatives. Perhaps one of the most valuable tools we have is timely and complete public health data. Regrettably, we currently do not have access to this tool in Pennsylvania. Complete laboratory reporting from persons with HIV (PWH) is essential for program planning and evaluation purposes. These data allow us to determine how many PWH access care and receive adequate treatment for their HIV infection. Persons who remain in care and exhibit durable viral suppression are unable to transmit HIV to their sexual partners.



Pennsylvania is one of just three states in the country that do not require complete laboratory reporting, thus failing to meet the criteria for public health reporting that is considered best practice in most jurisdictions in the United States. The CDC notes that “when all CD4 and viral load results are reported, public health agencies can better allocate resources for HIV prevention and care, monitor trends, address clusters, and ensure that people living with HIV are and remain in care.” If we have any hope of ending the HIV/AIDS epidemic in the Commonwealth of Pennsylvania, we must enact complete laboratory reporting for these measures so that we can clearly measure health outcomes for people living with HIV. These data will also enable us to identify and address population-

level disparities in HIV care, thus promoting health equity, especially among the State's underserved and vulnerable populations.

We urge you to approve Regulation #10-209 so that our community and other advocates across Pennsylvania can work together to end the HIV/AIDS epidemic in the Commonwealth.

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Sincerely,

Allegheny County Health Department

Allies for Health + Wellbeing

Community Human Services, Project Silk

Community Liver Alliance

Hugh Lane Wellness Foundation

Jewish Healthcare Foundation

Magee-Womens Research Institute

Persad Center

Prevention Point Pittsburgh

Positive Health Clinic, Center for Inclusion Health, Allegheny Health Network

PACT Clinic, UPMC Center for Care of Infectious Diseases

University of Pittsburgh Division of Infectious Diseases

Katie Conroy Rubeo, MPAS, PA-C, AAHIVS

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