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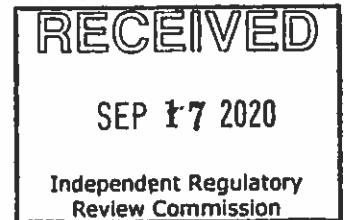
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COMMONWEALTH OF PENNSYLVANIA
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Pennsylvania Independent Regulatory Review Commission (IRRC)
333 Market St.,
14th Floor
Harrisburg, PA 17101

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

Dear IRRC Commissioners,

At no time in Pennsylvania's or the nation's history is it more apparent that accurate and robust communicable disease reporting is essential for disease prevention and quality of and access to care. The Department of Health's efforts to bring HIV test result reporting in line with CDC recommendations align with the most forward-thinking approaches in public health. As such, I support DOH's final form regulations requiring complete reporting of CD4 T-Lymphocyte, viral load, and genotyping test results relating to HIV.

As mentioned in the regulation analysis, complete reporting is critical to the *National HIV/Aids Strategy* of preventing new cases. Without it, the efficacy of prevention strategies such as contact tracing is limited. By raising the threshold of CD4 T-Lymphocyte, viral load, and genotyping test reporting, people with HIV, but not antibodies can be identified. This allows health departments to locate people exposed who might otherwise not have known they were at risk of infection.

As the medical and coverage communities move away from a piecemeal, disjointed approach to care and toward that which is transparent, integrative, and collaborative, public health must follow. Complete test reporting ensures that treatment is successful and that individuals are getting the care and services they need. With this reporting, persons with HIV and seronegative individuals can not only achieve viral suppression but gain access to safe housing, food services, and counselling if needed, increasing their chances of success. Additionally, more complete reporting sheds light on hard-to-reach populations and their needs and presents an opportunity to address and reduce HIV-related health disparities. As has been illuminated by the current public health emergency, equitable treatment cannot happen without complete data reporting.

Thank you for the opportunity to comment on the Department's crucial regulatory changes.

Sincerely,

Dan Frankel
State Representative, 23rd Legislative District