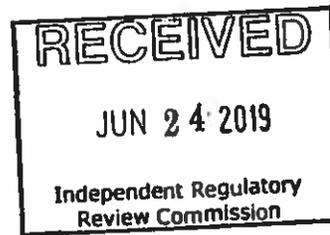


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CITY OF PHILADELPHIA

OFFICE OF THE HEALTH COMMISSIONER

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Thomas A. Farley, MD, MPH
Health Commissioner

June 24, 2019

The Independent Regulatory Review Commission (IRRC)
333 Market Street,
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:

We write in support of the Pennsylvania Department of Health's proposed regulation requiring the reporting of all CD4 T-Lymphocyte cell counts related to HIV infection, as well as viral load test and genotyping results.

The spread of HIV is a serious public health issue. From 2012 to 2016, there were more than 6,000 new HIV cases diagnosed in Pennsylvania. By 2020, there could be as many as 42,000 people in Pennsylvania living with HIV¹. The *National HIV/AIDS Strategy for the United States: Updated to 2020* establishes four primary goals: reducing the number new HIV infections; increasing access to care and optimize health outcomes for people living with HIV (PLWH); reducing HIV-related health disparities and health inequities; and achieving a more coordinated national response to the HIV epidemic. The *Strategy* also urges efforts to refocus and strengthen the ongoing work in HIV prevention, care, and research through widespread testing and linkage to care, enabling PLWH to access treatment early; broad support for PLWH to remain engaged in comprehensive care, including support for treatment adherence; universal viral suppression among PLWH; and full access to comprehensive pre-exposure prophylaxis (PrEP) services.

Pennsylvania is one of only four states in the nation that does not mandate reporting of all CD4 test results and one of only two states that does not require reporting of all viral load test results². This severely limits the state's ability to comply with standards set by the CDC recommendations, accurately

¹ Pennsylvania Medical Society. (2019 May 22). *PA Department of Health Plans to Update HIV Reporting Requirements*. Retrieved from <https://www.pamedsoc.org/detail/article/HIV-reporting-requirements>

² The CDC HIV Surveillance Report (2014) Monitoring Selected National HIV Prevention and Care Objectives by Using HIV Surveillance Data. Retrieved from <https://www.cdc.gov/hiv/pdf/library/reports/surveillance/cdc-hiv-surveillance-supplemental-report-vol-21-4.pdf>

report on CDC-required core HIV indicators, and monitor and enhance patient outcomes across the continuum of HIV care services. The ability to meet the goals set forth in the *National HIV/AIDS Strategy* depends on comprehensive reports of HIV-related tests, including all CD4+ T-lymphocyte (CD4) and viral load test results.

It is for this reason, reporting of all CD4 and viral load test results are already required in Philadelphia. Reporting of all CD4 T- and viral load test results allows the city to better track the epidemic, focus resources based on needs of impacted communities and improve the health of the city's residents.

As the National HIV/AIDS Strategy notes:

HIV surveillance data are used extensively to target and evaluate HIV prevention and care programs. Therefore, comprehensive and timely data are critical, as are continued improvements in electronic laboratory reporting as timely receipt of laboratory data is critical. Surveillance necessitates a complex system of reporting from providers, laboratories, and State and local health departments to coordinate accurate, complete, and timely reporting³.

Proposed Regulation #10-209 will help to ensure PLWH have access to care, and are engaged in care and are virally suppressed; to facilitate the monitoring of the HIV epidemic in Pennsylvania; and to bring Pennsylvania HIV reporting in line with national standards. We therefore fully support the proposed regulation.

Sincerely,



Thomas A. Farley, MD, MPH
Health Commissioner

³ White House Office of National AIDS Policy. (2016 December). National HIV/AIDS Strategy for the United States: Updated to 2020. Retrieved from <https://files.hiv.gov/s3fs-public/nhas-indicators-supplement-dec-2016.pdf>