HIV Testing Reimbursement Workgroup  
A subcommittee of the HIV Health Care Access Working Group  
(Affiliated with the Federal AIDS Policy Partnership)

September 2, 2014

Stuart Caplan  
Office of Clinical Standards and Quality  
Centers for Medicare & Medicaid Services  
7500 Security Blvd.  
Baltimore, MD 21244

Re: National Coverage Determination – Reconsideration for HIV Testing

Dear Mr. Caplan:

The HIV Testing Reimbursement Subgroup of the HIV Health Care Access Working Group writes in support of the proposal to update Medicare’s National Coverage Determination (NCD) for routine testing for HIV. As we have noted in earlier correspondence, this change is necessary to expand Medicare beneficiaries’ access to preventive services, as intended by health care reform. Specifically, Medicare is authorized to cover, on a national basis, preventive services that have been graded “A” or “B” by the U.S. Preventive Services Task Force (USPSTF). The law further provides that beneficiaries should have access to these services without cost-sharing.

Since 2009, Medicare national coverage for HIV screening has been limited to at-risk individuals and all pregnant women, based on 2007 recommendations of the USPSTF. In 2013, the USPSTF revised its recommendation, in favor of routine testing for all individuals up to age 65, regardless of their risk or perceived risk. The 2013 recommendation is also more closely aligned with HIV testing guidelines of the Centers for Disease Control and Prevention (CDC).

A final NCD that is aligned with current preventive services recommendations will promote routine testing in the Medicare program. In our experience as HIV providers and patient advocates, routine testing is critical to identifying people with HIV and getting them into care on a timely basis. A large proportion of people with HIV – up to 20 percent – are not aware of their infection. Updating Medicare’s national coverage policy is a necessary step to improve access to testing and treatment.

Thank you for your consideration.

Sincerely,

African American Health Alliance  
AIDS Action Baltimore  
AIDS Alabama  
AIDS Alliance for Women, Infants, Children, Youth & Families  
AIDS Foundation of Chicago
The AIDS Institute
AIDS Legal Referral Panel
AIDS Network of Western New York
AIDS Project Los Angeles
AIDS Research Consortium of Atlanta
AIDS United
American Academy of HIV Medicine
Apicha Community Health Center
Asian & Pacific Islander Wellness Center
Association of Asian Pacific Community Health Organizations
Association of Nurses in AIDS Care
The Black AIDS Institute
California Lesbian, Gay, Bisexual, and Transgender Health & Human Services Network
Cascade AIDS Project
Community Access National Network
Empower U
Georgia AIDS Coalition
The Global Justice Institute
Hepatitis Education Project
HIV Dental Alliance
HIV Law Project
HIV Medicine Association
HIV Prevention Justice Alliance
Housing Works, Inc.
Howard Brown Health Center
Human Rights Campaign
JSI Research & Training Institute, Inc.
Latino Commission on AIDS
Los Angeles LGBT Center
Legacy Community Health
Louisiana AIDS Advocacy Network
Metropolitan Community Churches
The Minnesota AIDS Project
Moveable Feast, Baltimore
National Alliance of State and Territorial AIDS Directors
National Association of County and City Health Officials
National Association of Social Workers
National Minority AIDS Council
National Viral Hepatitis Roundtable
NO/AIDS Task Force
Ohio AIDS Coalition
Philadelphia Center
Project HEAL
Project Inform
Racial and Ethnic Health Disparities Coalition
Treatment Access Expansion Project
Treatment Action Group
Urban Coalition for HIV/AIDS Prevention Services
VOCAL New York