

February 24, 2015

Re: Proposed Decision Memo for Screening for the Human Immunodeficiency Virus (HIV) Infection (CAG-00409R), Centers for Medicare & Medicaid Services (CMS)

Dear Ms. Tamara Syrek Jensen, Dr. Joseph Chin, Ms. Lori Ashby, Dr. James Rollins, Mr. Stuart Caplan, and Dr. Susan Miller:

I am writing on behalf of the 132,000 members of the National Association of Social Workers (NASW), the largest membership organization of professional social workers in the United States. NASW works to enhance the professional growth and development of its members, to create and maintain standards for the profession, and to advance sound social policies. NASW also contributes to the well-being of individuals, families and communities through its work and advocacy.

The National Association of Social Workers (NASW) supports the recommendation by the Centers for Medicare & Medicaid Services (CMS) to expand coverage in section 210.7 of the Medicare National Coverage Determinations (NCD) Manual to include routine screening and testing for HIV infection for all individuals between the ages of 15 and 65 years. Changing guidelines from “perceived risk” to “routine” HIV testing will bring Medicare coverage policies more in line with the Center for Disease Control and Prevention (CDC) HIV Testing Recommendations and the U.S. Preventive Services Task Force (USPSTF) Recommendations for Screening for HIV. NASW encourages CMS to further expand coverage of routine screening and testing for HIV infection to people older than 65 years of age.

The proposed change supports the goals of U.S. National HIV/AIDS Strategy (NHAS) by increasing the number of persons living with HIV, as well as recommendations within the NHAS to support this goal through implementation of testing guidance based on the USPSTF recommendations.¹ Increased access to testing supports the NHAS goal to ensure that all those diagnosed with HIV or AIDS enter into and engage in medical and behavioral health care services.

NASW is committed to elimination of policies that contribute discrimination and health disparities among older adults.² Therefore, NASW recommends expanded coverage to persons older than 65 years of age. Research shows that older adults are more likely to be diagnosed with HIV infection late in the course of their disease. According to the Centers for Disease Control and Prevention (CDC), disease progression from HIV to AIDS in persons 65 years and older accounts for 53% of those diagnosed with HIV.³ Expanding routine screening and testing to persons 15 years of age and older will enhance prevention efforts, increase early diagnosis, and facilitate access to necessary health and behavioral health services.

¹ Office of AIDS Policy. (2014) National HIV/AIDS Strategy: Update 2014 to Implement Federal Actions http://www.whitehouse.gov/sites/default/files/docs/nhas_2014_progress_report_final_2.pdf

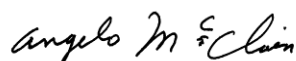
² Policy on Older Adults. (2008). In Social Work Speaks, 9th Edition. National Association of Social Workers: Washington, DC.

³ HIV Among Older Americans. Factsheet. Centers for Disease Control and Prevention (CDC). <http://www.cdc.gov/hiv/risk/age/olderamericans/>

Research has also shown that people who are aware of their HIV status may be more likely to take steps to prevent transmitting the virus to others.⁴ In practical terms, expanded coverage will provide clients and patients' ages 15 years and older easier access to testing, treatment, and resources through services based within their own community (e.g., Federally Qualified Health Centers or Rural Health Centers). Expanded coverage further supports the NHAS through increasing the opportunity to provide prevention and harm reduction information to clients, and to increase the numbers of persons living with HIV or AIDS that are engaged and retained in care.

Professional social workers in agencies and clinics providing Medicare eligible services have a critical role in providing prevention and early intervention services to persons living with or at-risk for HIV or AIDS. Social workers provide the link to community through outreach and case management, and are a critical link to reaching and providing services to the underserved communities increasingly at risk for HIV and at-risk populations.

We appreciate the opportunity to make comments on the proposed rule, and welcome your questions. If you have questions about NASW's comments, please contact my office at naswceo@naswdc.org or (202) 336-8200.



Angelo McClain, Ph.D., LICSW
Chief Executive Officer
National Association of Social Workers

⁴ Policy on HIV/AIDS. (2008). In *Social Work Speaks*, 9th Edition. National Association of Social Workers: Washington, DC.