ASTHO Comments on “Screening for Sexually Transmitted Infections (STIs) and High-Intensity Behavioral Counseling (HIBC) to Prevent STIs” Proposed Decision Memo: CAG-00426N

September 7, 2011

The Centers for Medicare and Medicaid Services in the Department of Health and Human Services seeks public comment on the “Screening for Sexually Transmitted Infections (STIs) and High-Intensity Behavioral Counseling (HIBC) to Prevent STIs” Proposed Decision Memo. Below, the Association of State and Territorial Health Officials (ASTHO) offers comments for consideration. ASTHO appreciates the opportunity to comment on this important topic.

ASTHO is the national nonprofit organization representing the public health agencies of the United States, the U.S. Territories, and the District of Columbia, as well as the 120,000 public health professionals these agencies employ. ASTHO members, the chief health officials of these jurisdictions, are dedicated to formulating and influencing sound public health policy and to assuring excellence in state-based public health practice. Our vision is healthy people thriving in a nation free of preventable illness and injury.

Addressing Sexually Transmitted Infections (STIs) is an important factor in reducing the incidence of preventable illness and death in the United States, and is therefore a key area of focus for ASTHO. Sexually active individuals with more than one partner should be screened for STIs at any age. In addition, ASTHO continues to work with its members to strengthen partnerships with healthcare and maximize the benefit of health reform on infectious disease prevention and control. ASTHO believes this proposed decision memo is important because it specifies that Medicare will cover certain prevention activities that will help reduce the incidence of STIs.

Screening Services

ASTHO encourages CMS and CDC to monitor and describe any changes in screening rates or case finding as a result of these activities. Any information documenting an increase in screening of Medicare patients due to the new coverage of services or an increase in screening in new populations will be useful information for state health agencies to know in their efforts to reduce disease transmission. Engagement of state and territorial public health agencies for case follow-up and surveillance is also strongly encouraged.

ASTHO recommends the memo clearly state whether Medicare Part D formularies include the required antibiotics consistent with the 2010 STD Treatment Guidelines. This information may help healthcare providers better serve their patients and reduce the incidence of non-treatment upon a positive test result. In addition, patients might be more likely to request screening if they know treatment will be covered.
ASTHO appreciates the encouragement of further research on STI intervention and racial and ethnic disparities. We support further discussion regarding how the specific proposed screening and counseling coverage may reduce these disparities, reduce the incidence of the included STIs among those populations, and have a positive impact on health equity.

**High-Intensity Behavioral Counseling (HIBC)**

ASTHO supports the inclusion of HIBC as part of CMS covered services. The coverage notes in the memo are helpful in that they give specific information regarding what type of counseling is covered, who may provide the counseling, and what the reimbursement structure will be for counseling given. It will be important for Medicare providers to refer their patients as appropriate to complementary or more intensive prevention services offered by public health, such as those recommended by the Community Guide.