



February 15, 2016

Tamara Syrek Jensen, JD
Director, Coverage and Analysis Group
Center for Clinical Standards and Quality
Centers for Medicare & Medicaid Services
7500 Security Blvd.
Baltimore, MD 21244

Attention: Screening for Hepatitis B Virus (HBV) Infection (CAG-00447N)

Dear Ms. Jensen:

On behalf of the American Academy of Family Physicians (AAFP), which represents 120,900 family physicians and medical students across the country, I write to comment and offer our full support regarding the [national coverage analysis](#) (NCA) for the screening of the Hepatitis B virus (HBV) infection as released by the Centers for Medicare & Medicaid Services on January 21, 2016.

The AAFP appreciates that CMS accepted a [formal request](#) to initiate a NCA for HBV infection and that this screening pathway is recommended with a grade B by the US Preventive Services Task Force (USPSTF) for persons at high risk for infection. We fully concur with this approach since the AAFP's [hepatitis policy](#) likewise recommends screening for HBV infection in persons at high risk for infection.

As referenced in the formal request to begin this NCA, the AAFP also is concerned that an alarming number of people in the United States have chronic HBV infection and that the majority are unaware of the infection. Since HBV is the leading cause of primary liver cancer and the only cancer that continues to rise in both incidence and mortality among men and women, the AAFP is particularly supportive of CMS taking this initial NCA step.

Since CMS is authorized to allow additional coverage of "additional preventive services" if it determines through the National Coverage Determination (NCD) process that the service is recommended with a grade A (strongly recommends) or grade B (recommends) rating by the USPSTF and meets certain other requirements, the AAFP urges CMS to initiate promptly an NCD consideration of hepatitis B screening.

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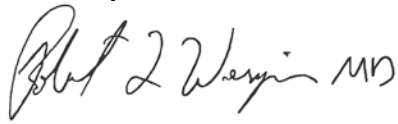
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Ms. Jensen
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The AAFP fully agrees with the formal request that by including the USPSTF hepatitis B screening recommendations under Medicare Preventive Services, CMS would align its policy not only with the science, the Centers for Disease Control and Prevention (CDC) and the USPSTF, but also with the goals of the federal government's Action Plan for the Prevention, Care, and Treatment of Viral Hepatitis. We remain hopeful that this would lead to improved health outcomes for Medicare beneficiaries, many of whom face significant disparities in health care.

We remain an available resource as HHS considers further viral hepatitis policy. For any questions you might have, please contact Bellinda Schoof, MHA, CPHQ, Division Director of Health of the Public and Science, at 800-274-2237, extension 3160 or bschoof@aafp.org.

Sincerely,

A handwritten signature in black ink that reads "Robert L. Wergin MD". The signature is written in a cursive style with a large initial "R" and "W".

Robert L. Wergin, MD, FAAFP
Board Chair

CC:
Michelle Issa
Lori Paserchia, MD