



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

December 17, 2014

Patrick Conway, MD
Deputy Administrator for Innovation & Quality
CMS Chief Medical Officer
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

RE: Screening for Cervical Cancer with Human Papillomavirus (HPV) Testing (CAG-00442N)

Dear Dr. Conway:

On behalf of the American Academy of Family Physicians (AAFP), which represents 115,900 family physicians and medical students nationwide, I write in response to the [national coverage analysis](#) (NCA) for screening for cervical cancer with human papillomavirus (HPV) testing as posted online by CMS on November 25, 2014.

In this NCA, CMS accepted the AAFP's formal request to CMS submitted in an April 24, 2014 [letter](#) to begin an analysis to determine if the agency should cover cervical cancer screenings with a combination of HPV and cytology (Pap smear) testing. The AAFP supports coverage for this screening which is recommended with a grade A by the United States Preventive Services Task Force (USPSTF) for females aged 30-65 at 5-year intervals as an alternative to triennial Pap smears, which is also recommended with a grade A.

Currently, Medicare covers a screening pelvic examination and Pap test for all female beneficiaries at 12- or 24-month intervals, based on specific risk factors. CMS coverage currently does not include the HPV testing. The NCA notes that HPV is a sexually transmitted infection that is associated with most cases of cervical cancer and then requests comments, particularly ones that include published clinical studies and other scientific information that provide evidence for improvement in short- and long-term outcomes related to the screening for cervical cancer with HPV testing.

The AAFP applauds CMS for initiating this NCA and urges CMS to promptly implement policy consistent with the recommendations of the USPSTF and the AAFP. Accordingly, we strongly encourage CMS to update its coverage of screening for cervical cancer, as called for in our original letter in April.

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Dr. Conway
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We appreciate the opportunity to provide these comments and make ourselves available for any questions you might have. Please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org.

Sincerely,

A handwritten signature in black ink that reads "Reid B. Blackwelder MD". The signature is written in a cursive style with a large initial "R" and a distinct "MD" at the end.

Reid B. Blackwelder, MD, FAAFP
Board Chair

CC:
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