

APPENDIX C

PUBLIC COMMENTS FROM EXTERNAL CONSULTANTS



THE AIDS INSTITUTE

April 30, 2012

Ms. Sherette Funn-Coleman
OS Paperwork Clearance Officer
U.S. Department of Health and Human Services
200 Independence Ave. SW
Washington DC 20201

Re: Ryan White HIV/AIDS Program Modeling Project--OMB No. 0990-New-Office of the Assistant Secretary for Planning and Evaluation

Dear Ms. Funn-Coleman:

The AIDS Institute, a national organization that promotes action for social change through public policy research, advocacy, and community education, is pleased to comment in support of the proposed modeling project by the Office of the Assistant Secretary for Planning and Evaluation (ASPE) on the Ryan White HIV/AIDS Program. We believe the questions ASPE has developed in its questionnaire are adequate and essential in determining how the existing Ryan White HIV/AIDS Program will evolve as the Affordable Care Act (ACA) is implemented.

Implementation of ACA and coordinating the coverage that it provides to the over half of a million people with HIV/AIDS who receive benefits under the Ryan White HIV/AIDS Program is one of The AIDS Institute's highest priorities. While we are looking forward to expanding health care coverage to more people through ACA, many of whom have HIV/AIDS, we are cognizant that there is a current system of care and treatment for low income people with HIV in the Ryan White Program. It will be critical to determine how the current Ryan White Program can best prepare for ACA implementation and what needs will still exist under the Ryan White Program when ACA is implemented.

We believe the questions developed by ASPE and the information that will be collected will be extremely useful in determining how to best meet the care and treatment needs of people living with HIV/AIDS in the United States. Providing care and treatment to people with HIV/AIDS is a goal of great public health significance and is included in the President's National HIV/AIDS Strategy.

For your consideration, we offer the following specific comments on the proposed questions for Part A and B grantees:

"Promoting action for social change through public policy research, advocacy, and education"

Question C. 5: Respondents should be made aware that there is a waiver process in meeting this requirement.

Question D. 1: The question should also include the opportunity to identify funding from other Parts of the Ryan White Program in their jurisdiction.

We also believe a question should be included on whether the grantee is prepared for billing and provides any funding, education, technical assistance on billing of medical services and treatment. The issue of billing was included in the provider questionnaire but we believe this topic should also be addressed in the Part A and B grantee questionnaire since it is relevant and extremely critical to their work in the future.

As you move forward to begin the process of interviewing the grantees and providers, we believe since the answers are very complicated and will require some advance thinking and research, we are assuming that they will be sent to respondents far before the actual interview.

The AIDS Institute appreciates the opportunity to submit these comments. Should you have any questions or comments, please feel free to contact me at 202/462-3042 or cschmid@theaidsinstitute.org. Thank you very much.

Sincerely,



Carl E. Schmid II
Deputy Executive Director

“Promoting action for social change through public policy research, advocacy, and education”

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April 26, 2012

Sherette Funn-Coleman

Office of the Assistant Secretary for Planning and Evaluation (ASPE)
200 Independence Avenue S.W.
Washington, D.C. 20201

To Whom it May Concern:

On behalf of the National Alliance of State and Territorial AIDS Directors (NASTAD), which represents the public health officials that administer state and territorial HIV/AIDS and adult viral hepatitis prevention and care programs nationwide, I am writing to provide comments regarding the proposed project: Ryan White HIV/AIDS Program Modeling Project. AIDS Directors administer Part B and the AIDS Drug Assistance Programs (ADAPS) of the Ryan White Program.

In conducting the above-referenced study, it will be important to assure that the proposed respondents to be included in the study represent:

- The geographic distribution of the HIV/AIDS epidemic in the United States
- Grantees with varying burden of the epidemic (low, medium and high incidence jurisdictions)
- Grantees with varying level of experience preparing for the implementation of health reform

In addition, NASTAD recommends that Ryan White clients, case managers, clinicians, pharmacists and community stakeholders also be included in the study as their experiences with the Program will be impacted by the implementation of health reform. Individuals should be provided anonymity via informed consent to assure collection of full and accurate information.

In order to enhance the quality, utility, and clarity of the information to be collected, NASTAD recommends that the study be more reflective of the overall Ryan White Program. The current topics to be addressed (HIV service needs and use; coordination of client insurance enrollment, benefits, and services; factors that influence variation in HIV care costs and selection of AIDS Drug Assistance Program cost containment procedures; and methods of ensuring quality care) should be expanded to assess the impact of health reform on the need for expanded access to care of all individuals living with HIV, the ability of all Parts of the Ryan White Program to wrap-around insurance, and the effect that access to insurance will have on the current structure of Ryan White.

NASTAD believes that the Ryan White Program must continue both as the Affordable Care Act is implemented and after implementation is complete. With many more individuals having insurance coverage (through Medicaid expansion and health exchanges) in 2014, it will be essential for Ryan White programs to provide care within the exchanges and continue to provide specialty HIV/AIDS

care. In June 2011, 31% of ADAP clients served were enrolled in Medicaid and/or Medicare; Ryan White will continue to have to provide wrap around services after 2014. In addition to filling in gaps in existing insurance, the Ryan White Program will provide coverage of clients not eligible for health reform. Ryan White will also need to continue to provide case management services and other supportive services, as they are a crucial aspect of keeping people living with HIV/AIDS in care and helping clients access services and treatment.

Thank you for the opportunity to provide comments on the proposed project: Ryan White HIV/AIDS Program Modeling Project. We appreciate your attention and consideration of these comments. Please do not hesitate to contact me at (202) 434-8090 or by email at jscofield@NASTAD.org if you have questions related to these comments.

Sincerely,



Julie M. Scofield
Executive Director