



December 7, 2015

RE: 2015 Measures under Consideration by the National Quality Forum (NQF) Measure Applications Partnership (MAP)

On behalf of the Association of Asian Pacific Community Health Organizations (AAPCHO), we appreciate the opportunity to provide comments on the 2015 Measures Under Consideration by the Measures Application Partnership at the National Quality Forum.

AAPCHO is a national not-for-profit association of 35 community-based health care organizations, 29 of which are Federally Qualified Health Centers (FQHCs). AAPCHO members are dedicated to promoting advocacy, collaboration, and leadership to improve the health status and access of medically underserved AA&NHOPIs in the U.S., its territories, and its freely associated states.

AAPCHO's members provide linguistically and culturally competent care to millions of vulnerable Asian Americans, Native Hawaiians, and Other Pacific Islanders (AA & NHOPIs). Many of our members serve a higher than average percentage of patients with hepatitis B and C, as both diseases have high prevalence rates in Asian Americans and Pacific Islanders. Because of the high rates of hepatitis B found in many of our member centers, AAPCHO co-founded Hep B United, a national coalition of over 30 local coalitions working to address hepatitis B through education, screening, vaccination, and linkage-to-care efforts.

As such, we strongly support the measures under consideration for Medicare beneficiaries living with chronic viral hepatitis and liver disease. We particularly support the following process and outcome measures under the Merit-Based Incentive Payment System program:

- MUC15-210: Hepatitis A vaccination for patients with cirrhosis
- MUC15-211: Hepatitis B vaccination for patients with cirrhosis
- MUC15-217: Screening for Hepatoma in patients with Chronic Hepatitis B
- MUC15-220: Hepatitis B vaccination for patients with Chronic Hepatitis C
- MUC15-229: Hepatitis C Virus (HCV)- Sustained Virological Response (SVR)

These measures align with Hep B United and AAPCHO's priorities to increase hepatitis B testing and vaccination in the high-risk populations that AAPCHO members serve, and improve access to care and treatment for individuals living with chronic hepatitis B to prevent end-stage liver disease and liver cancer.

Of the identified and reported cases of hepatitis B virus infection in the United States between 2007 and 2012, 15.6% were over the age of 65 and part of the Medicare covered population. It is vital that seniors diagnosed with chronic hepatitis B be linked to care and monitored for

hepatocellular carcinoma, thus, we particularly commend the inclusion of *MUC15-217: Screening for Hepatoma in patients with Chronic Hepatitis B*.

We respectfully take this opportunity to encourage the Centers for Medicare and Medicaid (CMS) to consider measures for screening for hepatitis B virus infection for those individuals at high risk. An estimated 67% of individuals do not know they have chronic hepatitis B including those who are part of the Medicare covered population. It is imperative that CMS consider a National Coverage Determination to screen individuals at risk for hepatitis B, matching the U.S. Preventive Services Task Force's "B" grade recommendation for hepatitis B screening in persons at high risk for infection.

We thank the NQF Measures Application Partnership for your work and consideration of our comments. AAPCHO greatly appreciates this opportunity to provide input to the 2015 Measures Under Consideration that impact the health of Medicare beneficiaries living with chronic viral hepatitis and liver disease. Please contact Isha Weerasinghe, AAPCHO's Director of Policy and Advocacy at isha@aapcho.org if you have any questions or comments.

Thank you,

A handwritten signature in blue ink, appearing to read 'Jeffrey Caballero', with a long horizontal line extending to the right.

Jeffrey Caballero, MPH
Executive Director