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September 4, 2014

Laura Cheever, MD, ScM
Associate Administrator
HIV/AIDS Bureau, U.S. Department of Health and Human Services
Health Resources and Services Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Dr. Cheever:

The Communities Advocating Emergency AIDS Relief (CAEAR) Coalition is the oldest national membership organization which advocates for federal policy, legislation, regulations, and appropriations for the Ryan White Program to meet the care, treatment, support and prevention needs of people living with HIV/AIDS and the organizations that serve them, focusing on health care reform and the evolving role of the Ryan White Program.

The CAEAR Coalition is concerned with the Administration's FY 2015 budget proposal to consolidate Ryan White Part D funding into Part C of the program. Our concerns include:

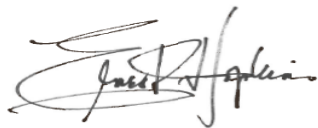
- Pregnant women, children, and adolescents need access to obstetricians and pediatricians. Many Part C programs do not have these medical providers on staff and the plan does not specifically require access to these specialties.
- Adolescents account for 39 percent of new HIV infections in the United States. Adolescents are not "small adults" whose care requires a tweaking of adult HIV/AIDS treatment models. Many programs funded by Part D have successfully addressed the specialized care needs of adolescents, and CAEAR Coalition is concerned these successful models will not be protected and replicated when Part D funding is consolidated into Part C.
- Part D-funded programs are the main providers of HIV care and treatment in some communities. CAEAR Coalition is concerned that the consolidation of Part D and C might leave some communities without adequate access to effective and comprehensive HIV care and treatment for key populations.
- Some Ryan White medical clinics currently receive only Part D funding. CAEAR Coalition is sensitive to community concerns that these sites are disadvantaged in a Part C funding competition, especially if there is already a Part C program serving that community. The proposal does not provide assurances that these Part D programs will not be eliminated, thereby, reducing the community's access to HIV care and treatment.

- The proposal was made without sufficient input from HIV medical providers, program administrators, and patients. CAEAR Coalition is concerned about any dramatic program changes occurring without the benefit of key stakeholder input.
- The implementation plan for the consolidation is unclear. If the final federally approved FY14 budget does not include this shift in funding, will HRSA move forward to make these programmatic changes administratively? CAEAR Coalition urges HRSA/HAB to provide more detail as soon as possible, outlining what the consolidation process would entail and how it would practically impact grantees and access to HIV care and treatment in communities.

Early access to HIV care and treatment of pregnant women, adolescents and youth saves lives and prevents new infections by reducing the risk of transmission to near zero for patients who are virally suppressed. While the ACA provides important new health care coverage options for many patients, many individuals still face barriers to full access to ACA provisions like Medicaid expansion because of state-based restrictions. Some health insurance plans do not cover many of the essential services standardized within Ryan White programs as comprehensive care and treatment. These services remain necessary for many patients to effectively manage their HIV infection. High-cost sharing and these benefit gaps necessitate a vital and ongoing role for the Ryan White Program. Increasing access to and successful engagement in effective, comprehensive HIV care and treatment is the only way to lead the nation to an AIDS-free generation and reduce the devastating costs of – including lives lost to – HIV infection. To be effective, this approach to service provision needs to be specific to the particular target population (e.g. pregnant women, adolescents).

CAEAR Coalition thanks you for your ongoing efforts to ensure the Ryan White Program provides comprehensive treatment and care to people living with HIV/AIDS. We look forward to your response.

Sincerely,



Ernest Hopkins
Chair, Board of Directors
CAEAR Coalition