

February 11, 2023

## SUBMITTED ELECTRONICALLY

Whitman-Walker Health is a Federally Qualified Health Center (FQHC) serving greater Washington, DC's diverse urban community, including individuals who face barriers to accessing care, and with a special expertise in HIV care and serving lesbian, gay, bisexual, transgender and questioning/queer (LGBTQ) populations. Whitman-Walker has been a nationally recognized leader in LGBTQ+ community health for almost four decades. In calendar year 2021, we provided health care to over 16,000 patients. In 2021, about 50% of our patients identified as Lesbian, Gay, or Bisexual and 14% as Transgender. Whitman-Walker Health received the National Committee for Quality Assurance's (NQCA) Patient-Centered Medical Home (PCMH) Recognition. This recognition shows Whitman-Walker uses evidence-based and patient-centered processes to serve patients. These practices focus on highly coordinated care and long-term relationships. Whitman-Walker's medical teams are recognized at the highest level of this recognition at all our care center sites.

Whitman-Walker has been a nationally recognized leader in HIV treatment and prevention for almost four decades. In calendar year 2022, we provided health care to 3,147 people living with HIV. We serve about 25% of the District of Columbia's reported HIV-positive population, many of whom are low-income or members of otherwise underserved communities. In 2022, eighty three (83) percent of our patients living with HIV are virally suppressed – a success rate much higher than the national and DC averages for people living with HIV, and comparable to the success rate for Ryan White-funded programs.

Whitman-Walker supports a national coverage determination (NCD) for Pre-Exposure Prophylaxis for HIV (PrEP), both as a physician-administered and self-administered prevention modality.

We strongly support the coverage determination to include the option for the prevention modality, both oral and injectable formulations, to be administered as a pharmacy benefit. This designation supports patient access to the latest prevention modality, and supports the operational sustainability of community health centers, particularly those who serve high-risk populations.

Currently, community pharmacies can improve patient adherence and retention in treatment plans through increasing the availability of the medication, supporting the inclusion of clinical staff and community health workers and pharmacy staff in patient care, and ensuring the efficient operation of health centers through the contributions of pharmacy income to health center sustainability.

Additionally, A pharmacy benefit designation is appropriate to anticipate the ongoing implementation science research to facilitate self-administered injections of long-acting PrEP. Establishing a comprehensive coverage of injectable and oral PrEP as both a pharmacy and medical benefit ensures that CMS's decision will align with best practices for HIV prevention efforts for years to come.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "CB Brooks". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Benjamin Brooks, JD, MPH,  
Associate Director of Policy and Education  
Whitman-Walker Institute