



November 8, 2024

Office of the Insurance Commissioner  
Washington State  
P.O. Box 40258  
Olympia, WA 98504-0258

Re: Consolidated Health Care (R2024-05) Rulemaking

To the Rules Coordinator:

Whatcom County Health and Community Services appreciates the opportunity to comment on [Consolidated Health Care \(R2024-05\) rulemaking](#). We, in alignment with Public Health Seattle King County (PHSKC) and other local health jurisdictions, are writing to request that expanded screening for syphilis and all components of Latent Tuberculosis infection (LTBI) screening and treatment be included as preventative services and not be subject to cost-sharing for health plans in Washington.

Part of this rule-making process is implementation of ESHB 1957, Health Carriers- Coverage of Preventative Services without Cost Sharing, which authorizes the insurance commissioner to adopt rules related to “any future preventive services recommendations and guidelines issued by the United States preventive services task force, the advisory committee on immunization practices of the centers for disease control and prevention, and the health resources and services administration or related federal rules or guidance.”<sup>i</sup> We are asking the Insurance Commissioner consider specific recommendations for syphilis and LTBI in the Consolidated Health Care rulemaking.

While the US Preventative Services Task Force (USPSTF) currently recommends early screening for syphilis infection in all pregnant women and for “others who are at increased risk of infection,”<sup>ii</sup> the recommendation is vague. This ambiguity may not consistently ensure access to testing without cost sharing. Removing cost-sharing is essential to effectively screen all at-risk populations and address the growing syphilis epidemic and associated long-term health consequences. In 2021, Whatcom County expanded its syphilis screening recommendations to providers<sup>iii</sup>. We request that the Insurance Commissioner use detailed language to avoid billing for syphilis testing.

The USPSTF has issued a Grade B recommendation for LTBI screening in populations at increased risk. These recommendations detail screening tests and other inputs, including chest radiographs (x-rays) needed to diagnose LTBI<sup>iiii</sup>; they also note: “To achieve the benefit of screening, it is important that persons who screen positive for LTBI receive follow-up and

treatment.” Currently, chest x-rays and treatment for LTBI are not routinely covered by health insurance without cost-sharing, which is a barrier to TB disease prevention. Early detection and treatment of infection is essential in preventing the development of active TB, which is a serious contagious illness requiring prolonged, expensive courses of treatment.

We ask that you ensure that those insured in Washington can access syphilis testing and the full range of LTBI screening and treatment services with no cost-sharing. Thank you for considering changes during this consolidated rulemaking process, which will support efforts to prevent illness and poor health outcomes.

Sincerely,



Dr. Amy Harley, MD, MPH  
Health Officer  
Whatcom County Health and Community Services

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<sup>i</sup> <https://lawfilesexternal.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/House/1957-S.SL.pdf?q=20240603093556>

<sup>ii</sup> <https://www.uspreventiveservicestaskforce.org/uspstf/recommendation/syphilis-infection-nonpregnant-adults-adolescents-screening>

<sup>iii</sup> <https://providers.whatcomcounty.org/2021/07/7-26-21-health-advisory-increased-syphilis-transmission-among-heterosexuals/>

<sup>iiii</sup> <https://www.uspreventiveservicestaskforce.org/uspstf/recommendation/latent-tuberculosis-infection-screening>