

Harold P. Wimmer
National President and
CEO

December 12, 2017

Leroy Richardson
Chief, Information Collection Review Office
Centers for Disease Control and Prevention
1600 Clifton Road, MS D-74,
Atlanta, GA 30333

Re: Proposed Data Collection Submitted for Public Comment and
Recommendations (Docket No. CDC-2017-0080)

Dear Mr. Richardson:

The American Lung Association appreciates the opportunity to submit comments on the Proposed Data Collection Submitted for Public Comment and Recommendations (Docket No. CDC-2017-0080) proposing an information collection project, Implementing the 6|18 Initiative: Case Studies.

The American Lung Association is the oldest voluntary public health association in the United States, currently representing the 33 million Americans living with lung diseases including asthma, lung cancer and COPD. For more than 110 years, the American Lung Association has been working to save lives by improving lung health and preventing lung disease.

The Center for Disease Control and Prevention's (CDC) 6|18 Initiative has brought together private and public payors and public health to address six common preventable health conditions, including tobacco use and asthma. Lung Association staff served as subject matter experts for the 6|18 Initiative and have seen the important role 6|18 has played in creating meaningful improvements in patient access to treatment. The American Lung Association strongly supports the 6|18 Initiative's efforts to help patients control their asthma and prevent and reduce tobacco use. The proposed data collection would allow more patients to benefit from this work.

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The Lung Association recognizes the critical importance of patients having access to evidence-based treatment. Since 2008, the organization has tracked tobacco cessation coverage in state Medicaid programs and since 2016 the Lung Association has collected state Medicaid programs' coverage of guidelines-based asthma care. The American Lung Association is committed to ensuring all patients are treated with guidelines-based care and recognizes that both primary prevention as well as preventive care such as tobacco cessation saves both lives and money.

The 6|18 Initiative is helping states bring together health care purchasers, payers and providers to implement four evidence-based interventions that promote a rational, stepwise approach to asthma management for patients. For example, Michigan worked with all Medicaid plans in the state to cover asthma medication delivery devices when purchased at retail pharmacies; previously, some plans covered these devices as durable medical equipment, which could lead patients to pay the full price for the devices at retail pharmacies, a barrier to accessing and adhering to asthma medications in line with guidelines-based care. By collecting information on evidence-based asthma control strategies from all participating states, CDC can help participating states, non-participating states and other stakeholders to learn about and adopt best practices and ultimately making a larger impact on population health with this work.

Recognizing the high rates of tobacco use in the Medicaid population, CDC has focused its efforts on reducing tobacco use in the Medicaid population. Over the past two years, eight states have brought together stakeholders from Medicaid and Public Health to work together to reduce tobacco use, by improving promotion, increasing coverage and tracking utilization. For example, in South Carolina, Medicaid coverage of tobacco cessation treatment varied by plan creating a barrier for providers to know what treatment could be prescribed to their patients. As a result of the 6|18 Initiative, the South Carolina Medicaid office worked with their Department of Public Health, the Centers for Medicare and Medicaid Services (CMS), CDC and other experts and implemented a comprehensive, uniform benefit for all Medicaid enrollees. Other states can learn from the experiences of South Carolina and the other states.

The Lung Association fully supports the CDC proposed information collection project. The case studies developed as a result of the project will improve the public health and improve the lives of the millions of Americans living with lung disease in the United States.

Sincerely,

A handwritten signature in black ink that reads "Harold Wimmer". The signature is written in a cursive, flowing style.

Harold P. Wimmer
National President and CEO

