



May 8, 2020

Director Ngozi O Ezike, MD
Illinois Department of Public Health
535 West Jefferson Street
Springfield, IL 62761

Erin Conley
Rules Coordinator
Illinois Department of Public Health
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Re: Comment on the Notice on Control of Sexually Transmissible Infections Code & HIV/AIDS Confidentiality and Testing Code, Dated March 27, 2020

Dear Director Ezike and Coordinator Conley:

We appreciate the Illinois Department of Public Health's (the Department) continued communication and collaboration with advocates and communities living with, or vulnerable to, HIV here in Illinois. Furthermore, we recognize the diligence shown by the Department in proposing these amendments in support of Governor Pritzker's Executive Order 8, issued February 1, 2019. The commitment to working with stakeholders to ensure that the State and its Departments are investing in programs and services that help maintain or reestablish connections to care for people living with HIV is imperative to ending the HIV epidemic here in Illinois. As organizations and individuals that advocate on behalf of and in support of people living with or

vulnerable to HIV, we commend the Administration and Department's dedication to improving the care.

Additionally, we support the Department's work to mobilize communities to create equity and justice for people living with, and vulnerable to, HIV or chronic conditions. Specific to people living with HIV, the Illinois Medicaid program is a critical component to healthcare coverage and access, with three out of five of all Illinoisans living with HIV on Medicaid. Below are our comments to the most recent proposed amendments from the Department.

I. Creating and maintaining connections to care must include protections for the privacy of people living with or vulnerable to HIV.

We commend the Department's inclusion of provisions that ensure that community members' private health information continues to be protected by all state, federal, and tribal confidentiality statutes and regulations. This inclusion is especially pertinent given the stigma and criminalization that people living with HIV are subject to, based solely on their HIV status. As included in the amendments, the undersigned organizations support the Department's decision to share information with the Illinois Department of Healthcare and Family Services (HFS) for the sole purpose of providing treatment to a person living with HIV. Additionally, we believe that the Department's inclusion that any personal health information stored by the Department, HFS, or any provider receiving the information for care, will be saved in a secure fashion.

II. In accordance with Executive Order 8, the Administration and Department should continue to work with advocates and community members to end the HIV epidemic.

People living with HIV have unique health needs and barriers to equitable healthcare. As stated above, three out of five people living with HIV are Medicaid members, and are often some of the State's most vulnerable residents. HIV service providers have successfully developed and operated within an integrated model of care for years, effectively engaging with and coordinating the complex care needs for this population. Implementing evidence-based, client-centered approaches that efficiently make use of all resources is a hallmark of HIV care coordination. Knowing that these networks of service already exists, the below signed organizations urge the Department to continue their communication and collaboration with advocates and community members to ensure that people living with or vulnerable to HIV are connected to care, and that their care is competent and compassionate.

Additionally, the Department's proposed amendments further the important work mandated by Executive Order 8 - especially the goals of taking action to end the HIV epidemic, reducing health disparities, and monitoring viral load metrics. To achieve the Administration's goal of ending the HIV epidemic in Illinois by 2030, the Department and other state agencies must continue their partnerships with organizations, advocates, and community members.

In sum, the below signed organizations and individuals are supportive of the amendments to the Control of Sexually Transmissible Infections Code & HIV/AIDS Confidentiality and Testing Code proposed by the Illinois Department of Public Health.

We appreciate the opportunity to provide these comments and thank the Department for its consideration.

Sincerely,

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Chicago, IL 60657
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Howard Brown Health
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Firas Mahdi

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