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March 12, 2012

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Thomas R. Frieden, MD, MPH, Director
Centers for Disease Control and Prevention (CDC)
United States Department of Health and Human Services
1600 Clifton Road
Atlanta, GA 30333

Re: Morbidity-Based Phase in of Federal Funding

Dr. Dr. Frieden:

The California Conference of Local Health Officers (CCLHO) urges CDC to preserve the level of Tuberculosis Cooperative Agreement funding and to immediately implement the morbidity-based formula for Federal funding for the control of tuberculosis (TB).

A slow phase-in of morbidity-based federal TB funding has been underway since 2005 to make TB funding more equitable to high-burden jurisdictions across the nation. In 2009, language directing the CDC to reexamine the phase in of the morbidity-based funding formula was included in an appropriations bill, and this resulted in support for the strategy from CDC.

California has reported the largest burden of TB disease of any state in the U.S, for the past 40 years, consistently reporting more TB cases than the next two high morbidity states combined. In 2010, 21% of the nation's TB cases were reported from California and 23% of its multidrug resistant TB cases. Adverse consequences of persistent TB morbidity, including TB disease in children and TB deaths in California, are the highest in the nation.

While California has been successful in an overall TB case decline since 1995, the state continues to report over 2,200 cases each year and receives over 4,000 immigrants notified as TB suspects by the federal government. The TB control work performed by California's programs encompasses evaluation of 10,000 suspects and nearly 20,000 contacts each year. In 2011, there were more TB outbreaks than in preceding years.

California has suffered declines in public health resources. Although, this is not unique to California, gains and losses in TB control in California significantly influence the nation's TB trajectory. With ongoing migration from high incidence countries and over 3 million persons with latent TB infection, the morbidity level in California is expected to prevail into the foreseeable future. To date, California has been a productive partner for CDC, providing a good return on its investment. The CDC can keep California on track and invest in the advances that will help the country maintain control and eliminate TB by safeguarding TB control resources and ensuring sufficient and fair allocation of federal resources proportional to morbidity across the nation.

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Although we acknowledge that TB control in the U.S. is a shared responsibility among federal, state, and local agencies, the CDC Division of Tuberculosis Elimination (DTBE) supports TB control by directing federal funds for TB control infrastructure and activities carried out by state and local programs. This partnership is crucial for the nation to effectively ensure that a curable airborne disease is reduced and preventable deaths are avoided.

Seven years after the CDC DTBE created a morbidity-based funding allocation formula, continued disparity of dollars per case across U.S. jurisdictions is untenable. While CDC began the shift towards morbidity-based funding in 2005, the full implementation of the allocation formula has been delayed. The impact of this delay translates to fewer TB services and control activities in areas of need.

CCLHO was established in statute in 1947 to advise the California Department of Health Services (now California Department of Public Health), other departments, boards, commissions, and officials of federal, state and local agencies, the Legislature and other organizations on all matters affecting health. CCLHO membership consists of all legally appointed physician health officers in California's 61 city and county jurisdictions.

Thank you for your consideration. If you have questions, please feel free to contact me at wilma.wooten@sdcounty.ca.gov or 619-542-4181.

Sincerely,

Original Signed By:

Wilma Wooten, MD, MPH
President, California Conference of Local Health Officers

cc:
Kevin Fenton, MD, PhD, Director, National Center for HIV/AIDS, Viral Hepatitis, STD and TB Prevention, CDC

Ken Castro, MD, MPH, Director, Division of TB Elimination, CDC

Ron Chapman, MD, MPH, Director, California Department of Public Health