

**Record of public comments received on proposed changes to regulations 7 AAC 27.213
Tuberculosis Screening of School Children.**

Comments Received From	Comments	Agency Decisions After Review of Comments	Thought Process
<p>Senator Tom Begich Senate District J Senate Minority Leader</p>	<p>I am deeply concerned to learn about the Department’s proposed changes on tuberculosis screening for school children. Alaska has the highest rates of TB in the nation, particularly concentrated in rural Alaska. As the Department’s own press release this past spring states: “It is much better to prevent contagious, infectious diseases from getting a stronghold in a population,” and “testing and prevention are still the highest priorities to limit the spread of TB.” Given this statement from the Department just eight months ago, I am shocked that DHSS would consider eliminating TB screening at all. I find it hard to believe that TB rates have been reduced and curtailed so much in the last eight months that screening children is no longer good practice. Citing the reasons listed in the public notice, can the Department please provide my office with the following information? What are the national guidelines that require repealing TB screening of children? What is the timeline for complying with these guidelines?</p>	<p>No change</p>	<p>Thank you very much for your inquiry and interest in this matter. I have attached a summary document with references that I believe will provide answers to most of your questions. Regarding your last two points: If our public health resources are so limited that TB screening for children is too difficult, what is the Administration doing to increase our resources? As noted in the attached informational document, resources are being spent in areas where there is a high burden of TB with more community-based efforts. This change is about aligning better with national guidelines and using resources where they are needed. TB screening for children at risk will continue to be a priority.</p>

	<p>Has the Administration considered working with federal officials to seek a waiver of these guidelines? What are the “best practices for pediatric health screening” that would suggest eliminating screening for a highly contagious infection? How has the Administration reached out to the Alaska Native community, which historically has had the highest rates of TB? Has the Administration reached out to school districts, NEA, and/or school nurses for feedback and insight given their work to ensure healthy and safe learning and working environments? If our public health resources are so limited that TB screening for children is too difficult, what is the Administration doing to increase our resources? How have federal resources to address the COVID-19 pandemic affected the State’s ability to screen for other communicable diseases and infections, including TB?</p>		<p>How have federal resources to address the COVID-19 pandemic affected the State’s ability to screen for other communicable diseases and infections, including TB? As noted in the attached informational document, this regulations project has been in the works since before 2013, so the repeal is not related to COVID-19 activities. Please let me know if I can be of further assistance.</p>
<p>Annie Berman Reporter Anchorage Daily News</p>	<p>Could you describe in more detail how the proposal for the change came to be? Given that Alaska has one of the highest rates of TB in the nation, is there concern that ending routine screenings could cause latent cases to go undetected?</p>	<p>No change</p>	<p>Thank you very much for your inquiry and interest in this matter. I have attached a background document with references that I believe will provide answers to your questions. Please let me know if I can be of further assistance.</p>

DPH/DHSS/SOA, proposed REPEAL of regulations, Preventive Medical Services, Tuberculosis (TB) Screening of School Children (7 AAC 27.213; Law File Number 2021200499); PUBLIC COMMENT RECEIVED.

	<p>What are the potential harms of ending routine TB screenings of school children and how do the pros outweigh those cons? In the absence of routine screenings, under the new proposal, who would be screened for TB?</p>		
Charles Bingham	<p>I saw you were taking comments on a proposal to end routine TB screening of school children in Alaska. I'm not sure why this proposal was made, especially since Alaska has the highest rate of TB in the country (8.5 cases per 100.000 persons), and it impacts Alaska Natives/Native Americans more than other ethnic groups. I worked at a hospital that at one time was a TB sanatorium, and that was during my lifetime. We need this screening.</p>	No change	<p>Thank you very much for your inquiry and interest in this matter. I have attached a summary document with references that I believe will provide answers to your questions. Please let me know if I can be of further assistance.</p>
Senator Jesse Kiehl Senate District Q	<p>I see H&SS has a regulation proposal to delete required tuberculosis testing among Alaska school children. Some constituents expressed concern. The regulations notice info said the proposal was to align with best practices and comply with national guidelines. A little internet searching didn't turn up recommendations to do away with broad-based screening, but my half hour on Google was hardly a comprehensive literature review. Could you point me at the standards in question?</p>	No change	<p>Thank you very much for your inquiry and interest in this matter. I have attached a summary document with references that I believe will provide answers to your questions. Please let me know if I can be of further assistance.</p>
Claire Stremple Reporter KTOO	<p>I'm a reporter with KTOO in Juneau, and I'm working on a story about the state's proposal to eliminate TB screening in schools. I have several questions about the program and its efficacy that</p>	No change	<p>Thank you very much for your inquiry and interest in this matter. I received the questions that you sent to Dr. Zink and I have attached an</p>

	<p>I think will contribute significantly to the public’s understanding of the state’s proposal.</p> <ul style="list-style-type: none"> -It looks like the state has done research and determined school screening is not effective – may I see that research or learn more about it? -A 1998 study showed school screening was effective for catching pediatric TB cases – what changed? -How many cases of TB this year? -How many cases last year? -How many cases discovered in schools last year? -How many in the last few years? -What is the racial and geographic breakdown of those cases? -How much does the program cost? -What would be the state’s savings? -Is this a cost saving measure? -Where will that money go, if not to TB screening? 		<p>informational document that I believe will provide answers to many of your questions. Included below are answers to some of your specific questions.</p> <p>Recent TB case counts in Alaska: 2020: 58 2019: 58</p> <p>We will not have finalized case counts for 2021 until 2022. TB screening of schoolchildren in Alaska was suspended starting in 2019, for the reasons delineated in the attached informational document.</p> <p>The study you cite from 1998 demonstrated a total of 15 active TB cases in children found through Alaska school screening over a 7-year period (1987-1994), during which it is estimated that 52,816 children were screened annually, for an estimated total of 369,712 children screened during that period. This means that approximately 24,647 children had to be screened to find one positive case.</p> <p>From 2014-2019 no new cases of active TB were identified in</p>
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<p>Claire Stremple Reporter KTOO</p>	<p>Some school districts I spoke with said that it's been more than two years since they had screenings. One nurse estimated five years. Did some districts opt out early? Or was TB screening only in high risk areas? Why is this change coming up now, if screening has been suspended for years? It looks like there were 8 cases of pediatric tuberculosis in 2019. How many of those were found in school screening?</p>	<p>No change</p>	<p>Thank you for your questions. As mentioned in the informational document, school-based TB screening in Alaska went through a series of refinements starting in 2013. This involved incremental changes to the policy which resulted in more targeted screening practices. For example, school districts were stratified by risk level (based on recent TB cases and transmission in the area), and universal school-based TB screening was limited to high-risk districts. Therefore, schools in districts</p>

			<p>designated as low-risk have not been doing widespread TB screening for years.</p> <p>The Division of Public Health first sought repeal of mandatory school-based TB screening in early 2019. The regulatory change has been on hold until now due to delays in the legislative process.</p> <p>School-based screening for TB did not occur in 2019, so any pediatric TB cases in that year were found through other measures, such as case contact investigation or testing based on symptoms or risk factors.</p>
<p>Claire Stremple Reporter KTOO</p>	<p>Quick fact check/clarification: were low risk schools exempted from screening as early as 2013, when the state began to refine the screening process?</p>	<p>No change</p>	<p>Low-risk schools were not completely exempted from TB screening, just from yearly universal TB testing. Starting in 2013, low-risk districts were only required to test students new to the district or in certain grades, rather than yearly testing of all students. As the process evolved over the next several years, this was further modified so that low-risk districts were required only to screen new students for TB risk factors and only to test those who were identified as having risk factors.</p>