



American Society for
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May 1, 2008

VIA EMAIL (omb@cdc.gov)
(Original Sent by Regular Mail)

Department of Health and Human Services
Centers for Disease Control and Prevention
Attn: Maryam Daneshvar, CDC Acting Reports Clearance Officer
1600 Clifton Road, MS – D74
Atlanta, GA 30333

**RE: Centers for Disease Control and Prevention (CDC) Proposed Cervical
Cancer Study – National Center for Chronic Disease Prevention and Health
Promotion (NCCDPHP)**

Dear Ms. Daneshvar:

The American Society for Clinical Pathology (ASCP) is pleased to provide the following comments regarding the NCCDPHP's proposed Cervical Cancer Study. This project seeks to determine the feasibility, acceptability, and possible barriers of using the human papillomavirus (HPV) test in conjunction with the PAP test for women over 30 as part of the National Breast and Cervical Cancer Early Detection Program (NBCCEDP) in order to better utilize program resources by extending the screening interval of women who are cytology negative and HPV test negative.

ASCP commends the NBCCEDP for its diligent efforts to prevent cervical cancer among women not covered by Medicaid, and fully supports the objectives of this proposed study. The results of this study could provide information essential to developing a more effective screening program for the nation's women who are at the greatest risk for cervical cancer. ASCP hopes that the study findings will not only be used to inform national cervical cancer screening policies, but will also serve to better educate the medical community and the public regarding the importance of annual screening to eliminate this preventable disease.

While new medical developments such as the HPV vaccine and the advent of the HPV test are exciting and useful among some populations, it is important for women to know that the Pap test remains the best way to detect abnormal cells on the cervix and thus help prevent cervical cancer. Using both tests for women in this age group maximizes the chances for identifying precancerous changes. ASCP congratulates NBCCEDP for using

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an evidence-based approach to determine the most effective use of laboratory services to optimize diagnostic recommendations for cervical cancer screening.

The ASCP is a professional society representing 130,000 members including some of the nation's leading pathologists and cytopathologists, many of whom diagnose cervical cancer, precancerous lesions, and other HPV related diseases; and laboratory professionals, including cytotechnologists, who perform, evaluate and interpret the tests required for these diagnoses. Among our members are researchers and clinicians at the forefront for cervical cancer diagnoses and I invite NBCCEDP to call on their expertise as this project moves forward. ASCP is committed to developing public policies aimed at improving the nation's health.

If you have any questions, please feel free to contact me at (310) 825-5656, or Andrea Bennett, Senior Program Manager, ASCP Public Policy and Government Relations, at 202-347-4450.

Sincerely,

A handwritten signature in black ink that reads "Lee H. Hilborne MD, FASCP". The signature is written in a cursive, flowing style.

Lee H. Hilborne, MD, MPH, DLM(ASCP)^{CM}, FASCP
President, ASCP