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Senator Baldacci, Chair
Representative Meyer, Chair
Members, Joint Standing Committee on Health and Human Services
100 State House Station
Augusta, ME 04333-0100

Re: LD 2100 – *“An Act to Require the Reporting of Alpha-gal Syndrome to the Maine Center for Disease Control and Prevention.”*

Senator Baldacci, Representative Meyer and Members of the Joint Standing Committee on Health and Human Services, thank you for the opportunity to provide information in opposition of LD 2100, *“An Act to Require the Reporting of Alpha-gal Syndrome to the Maine Center for Disease Control and Prevention.”*

LD 2100 requires the Maine Center for Disease Control and Prevention (Maine CDC) to add Alpha-gal Syndrome, also known as alpha-gal allergy, to the list of diseases and conditions requiring reporting to the Department. The bill seeks to improve data as well as public and provider awareness around this condition. If enacted, this bill will be costly to implement as it will require outreach to new laboratories (allergy testing labs) and updates to Maine’s surveillance system to accommodate electronic reports from new laboratories and subsequent investigations, place an undue burden on partners who do not typically report to Maine CDC, and likely will not meet the intended goal of increasing awareness. As emergency legislation, this will take effect immediately.

The Maine CDC is authorized to designate a communicable, occupational, or environmental disease or condition as a Notifiable Disease or Condition and establish requirements for reporting cases and suspected cases of such diseases and conditions. Pursuant to 22 MRS § 802, the Department’s Control of Notifiable Diseases and Conditions Rule (10-144 CMR chapter 258) governs the timing and manner of designated disease reporting, which the Maine CDC establishes based on public health impact and considering, among other factors, the frequency and severity of occurrences and available public health response(s). An infectious disease or condition might be added to the list as a new pathogen emerges, or a disease or condition might be removed as its incidence declines.

Maine CDC opposes LD 2100 for several reasons:

1. Alpha-gal syndrome is an allergy, not a disease. Requiring reporting of a food allergy sets a new precedent for the notifiable conditions list. Providers (usually allergists) who order testing for Alpha-gal syndrome are not routine reporters to Maine CDC, and, if this bill is enacted, providers will be subject to new reporting requirements, placing an administrative burden on these health care professionals to report and then to respond to

epidemiologists who are required to follow up after the initial report. Presented as emergency legislation, if enacted, the Maine CDC estimates up to six months before the State fully implements system changes for Alpha-gal syndrome as a Notifiable Condition.

2. Alpha-gal syndrome is currently associated with Lone Star tick bites. Lone Star ticks are incredibly rare in Maine and are mostly brought in by travelers. Researchers suggest that people who have Alpha-gal syndrome may not have symptoms and may not be aware of the allergy until after consuming red meat or being exposed to Alpha-gal syndrome. This tick is not considered to be endemic in the State, symptoms and reactions can be mild to severe, and the risk of acquiring this condition in Maine is low. There is minimal context for the data collected as it is not nationally notifiable, with very few states, including states where the tick is found, performing surveillance.
3. There is no public health intervention for Alpha-gal syndrome, only education on preventing tick bites, which Maine CDC's Disease Surveillance Epidemiology Program already provides extensively, including press releases, social media, and data and surveillance reports in addition to publications by infectious disease epidemiologists posted on the program's webpage.
4. Designating a disease or condition reportable under Maine's notifiable conditions rule does not ensure provider or the public awareness of the condition, rather, the public is better served by extensive outreach and dedicated education.

Maine CDC agrees that provider education around Alpha-gal syndrome, a potentially serious allergic response, is important; however, from the public health perspective, CDC opposes LD 2100. Maine CDC already does extensive education about ticks and tickborne diseases both to the public and health care providers, and information about Alpha-gal syndrome is included as part of the on-going education. This public health outreach is more likely to result in increased awareness than requiring reporting of the allergy.

Please feel free to contact me if you have any questions during your deliberation of this bill.

Sincerely,



Dr. Puthiery Va
Director
Maine Center for Disease Control
Department of Health and Human Services

