

Zachary Rosner, MD  
Chief of Medicine  
Correctional Health Services  
55 Water Street, 18<sup>th</sup> Floor  
New York, NY 10041

October 30, 2024

Jasmine Georges-Yilla  
Executive Director  
NYC Board of Correction  
2 Lafayette, Suite 1221  
New York, NY 10007

Dear Ms. Georges-Yilla:

In accordance with the Board of Correction’s New York City Correctional Health Care Minimum Standards, Section 3-13, “Variances,” the Correctional Health Services (CHS) division of NYC Health + Hospitals requests a 6-month renewal of a continuing variance from Section 3-04(b)(2)(v)(a) of the Minimum Standards, which requires that a tuberculin skin test (TST) be administered during the intake screening process for patients who do not have a prior history of a positive reaction to the test. The requested variance will authorize CHS to use interferon gamma release assays (IGRA) as a substitute for TST in tuberculosis screening, and to exempt from repeat screening those persons who have a documented negative test in the six months prior to their admission.

Since the implementation of CHS’ tuberculosis screening program fourteen years ago, IGRAs add negligible time to the intake process, obviate the need for a follow-up encounter solely to obtain TST results, and have become the preferred method of testing for latent tuberculosis as recommended by a 2017 guideline jointly issued by The American Thoracic Society, Infectious Diseases Society of America and Centers for Disease Control and Prevention.<sup>1</sup>

The consideration of the Board members and staff is greatly appreciated in this matter.

Sincerely,



Zachary Rosner, MD  
Correctional Health Services

cc: Patsy Yang, DrPH  
Bipin Subedi, MD

1. Lewinsohn DM et al. Official American Thoracic Society/Infectious Diseases Society of America/Centers for Disease Control and Prevention Clinical Practice Guidelines: Diagnosis of Tuberculosis in Adults and Children. Clin Infect Dis. 2017 Jan 15;64(2):111-115.