

May 16, 2018

Susan J. Curry, Ph.D.
Chair
U.S. Preventive Services Task Force
5600 Fishers Lane
Rockville, MD 20857

Re: Draft Research Plan for Sexually Transmitted Infections: Behavioral Counseling

Dear Chairperson Curry and U.S. Preventive Services Task Force Members:

On behalf of the National Association of County and City Health Officials (NACCHO), I am writing to provide comments on the "Draft Research Plan for Sexually Transmitted Infections: Behavioral Counseling." NACCHO is the leader, partner, catalyst and voice of nearly 3,000 local health departments across the country who work to develop policies and create environments that make it easier for people to be healthy and safe and specifically, supports local health departments' efforts to address rising rates of STIs and welcomes the opportunity to provide feedback on this plan.

The United States is currently facing its' highest levels ever of reportable STIs-- syphilis, gonorrhea, and chlamydia. For the third year in a row, 2016 surveillance data showed increasing rates for all three diseases with two million cases reported that year. Gonorrhea increased by 18.5 percent to 468,514 cases; syphilis increased by 17.6 percent to 27,814 cases; congenital (spread from mother to fetus) syphilis increased by 27.6 percent to 628 cases; and chlamydia increased by 4.7 percent, to 1.59 million cases. STIs can affect anyone but there are clear disparities as well, with youth (ages 15-24) making up much of the new chlamydia and gonorrhea infections; gay, bisexual, and other men who have sex with men (MSM) having the highest rates of syphilis and half of those diagnosed also living with HIV; and pregnant women facing some of the harshest outcomes from untreated syphilis with surging rates of congenital syphilis (a number that increased by 28 percent).

Maintaining and strengthening prevention is essential to an effective national response to these STI epidemics and NACCHO believes that this draft research plan is a step in the right direction with respect to strengthening those efforts and allowing STI prevention programs to hone their approach with regard to behavioral counseling interventions.

Proposed Analytic Framework

- NACCHO supports the analytic framework proposed for the draft research plan to determine the effectiveness of behavioral counseling interventions to impact behavioral and therefore, health outcomes related to STIs, in particular a reduction in the incidence of STIs. NACCHO believes that the behavioral outcomes identified (sexual risk and protective behaviors) are the correct measures to be looking at to determine if behavioral counseling interventions are effective at reducing the incidence of STIs and related morbidity and mortality.



Proposed Key Questions

- NACCHO supports the key questions being systematically reviewed by this draft research plan, looking at health outcomes, behavioral outcomes, and potential harms of behavioral counseling interventions.
- NACCHO believes that they are the correct questions to be included—in particular whether the effectiveness of these interventions differs by subpopulation or intervention characteristics.
- Adolescents have been identified as a subpopulation of interest because of their higher risk for both the question of whether behavioral counseling interventions decrease risky sexual behaviors and increase protective behaviors thereby reducing STIs, related morbidity and mortality, or both and whether the interventions reduce the risk for STIs. We recommend also including pregnant individuals as a specific subpopulation of interest because of the increasing rates of women of reproductive age with syphilis and the long-term health consequences of syphilis contraction in utero by a fetus. These make determining the effectiveness of behavioral counseling interventions of special importance with regard to this group.

As recently as a decade ago, reportable STIs were at historic lows and many health and medical professionals even believed that some (like syphilis) would be eliminated completely. This draft research plan could allow those working in STI prevention to better understand the role that behavioral counseling interventions could have on both reducing risky sexual behaviors and reducing actual STI incidence and putting the US back on that track.

Thank you for the opportunity to provide input on this draft research plan. If you have any questions, please contact Rebekah Horowitz, Senior Program Analyst, HIV, STI, and Viral Hepatitis, at rhowitz@naccho.org.

Sincerely,



Lori Tremmel Freeman, MBA
Chief Executive Officer