

June 4, 2018

The Honorable Alex Azar
Secretary, Department of Health and Human Services
200 Independence Ave. SW
Washington, DC 20201
RE: Document Identifier 0990-0438-60D Agency Information Collection Request, Teen Pregnancy Prevention Program

Dear Mr. Azar:

The National Association of County and City Health Officials (NACCHO) is pleased to submit the following response to Information Collection Request 83 FR 14643 concerning data collection for the teen pregnancy prevention program (TPPP).

As the national voice for the nation's nearly 3,000 local health departments, NACCHO is a leader, partner and catalyst for local health departments to ensure that people are able to make choices that make them healthier. Among their various functions, local health departments protect, promote, and improve the health of women, children, adolescents and families.

TPPP was established in 2010 to support community-driven, evidence-based or informed, medically accurate, and age-appropriate approaches to preventing pregnancy among adolescents, involving parents, educators, researchers, and providers. In the first five years of TPPP alone, more than 7,000 professionals were trained, 3,000 community-based partnerships were developed, eight new innovative programs were identified as contributing to positive health behavior change, and over half a million young people were served.

As the future of the program is discussed by the Department of Health and Human Services (HHS), it is important to have data to be able to assess the outcomes that TPPP has produced. The latest performance measures proposed by HHS are similar to data on the program that has previously been collected. NACCHO is supportive of the new proposed performance measures because they will allow comparison to previous evaluation.

However, NACCHO suggests that additional information is required to adequately assess the impact of TPPP. Key points such as demographic information of program participants and whether appropriate linkages to health care providers were made are not included in the proposed data to be collected. It is important to know who TPPP is serving and whether the program is helping young people access clinical and other health and social services.

In regards to data to be collected and the associated time estimate, HHS should be sure to include adequate time in the estimate to ensure the data are complete and correct. Time is involved in not only the collection process, but also in verifying the accuracy of the data.



Thank you for the opportunity to provide input on data collection for TPPP. For more information, please contact Eli Briggs, Senior Government Affairs Director, at ebiggs@naccho.org or 202-507-4194.

Sincerely,



Lori Tremmel Freeman, MBA
Chief Executive Officer

