



National Association of County & City Health Officials

*The National Connection for Local Public Health*

January 17, 2019

Don Wright, MD, MPH, FAAFP  
Deputy Assistant Secretary for Health  
Office of Disease Prevention and Health Promotion  
Department of Health and Human Services  
Tower Building 1101 Wootton Parkway, Suite LL100  
Rockville, MD 20852

Re: Secretary's Advisory Committee on National Health Promotion and Disease Prevention Objectives for Healthy People 2030

Dear Dr. Wright:

The National Association of County and City Health Officials (NACCHO) appreciates the opportunity to provide comments on the Secretary's Advisory Committee on National Health and Disease Prevention's proposed objectives for Healthy People 2030 (HP2030).

NACCHO represents nearly 3,000 local health departments. These city, county, metropolitan, district, and tribal departments work every day to protect and promote health and well-being for everyone in their communities. NACCHO has used the online system to provide input on specific proposed HP2030 objectives. However, I also wanted to take this opportunity to make some additional overarching comments for your consideration.

Local health officials use Healthy People objectives to inform policy development and priority setting. These objectives often drive funding decisions at the local level; therefore, it is important to ensure objectives and their associated measures are reflective of the breadth of important activities, programs, and policies that will truly have an impact on health across the nation. Therefore, NACCHO recommends that HHS carefully consider the impact at the local level of removal of objectives and measures that have previously been implemented at the local level.

NACCHO appreciates the desire by the Department to streamline HP2030. However, removal of some of the previous objectives, as opposed to updating them for the future, could impede the progress that has been made from previous iterations of Healthy People. Unintended consequences may result such as a reduced community focus on objectives and measures that have not been retained. In addition, funding decisions at the local level can be influenced by changes made in HP2030 with a lack of community support resulting from removal of objectives. For example, a previous objective included in HP 2020, TU-8, "Increase comprehensive Medicaid insurance coverage of evidence-based treatment for nicotine dependency in States and the District of Columbia," is not included in HP 2030. Even though improving coverage helps Medicaid beneficiaries quit smoking, an important outcome in terms of both saving lives



and money, its removal from the HP2030 objectives could signal a de-prioritization at the national level, with corresponding impacts in community focus.

Similarly, we encourage the Committee to ensure that their objectives and measures are consistent with and in line with other national priorities and goal-setting documents. For example, the objectives under the Immunization section have been severely reduced in HP2030. The proposed objectives fail to reflect the HHS Strategic Plan FY2018–2022, which acknowledges that “infectious diseases are a major health and economic burden for the United States.” While NACCHO supports and appreciates that the Committee maintained a lifespan seasonal influenza vaccination objective (IID-2030-13), we strongly urge the Committee to take a similar, consistent approach with regard to other Advisory Committee on Immunization Practices recommended vaccines across the lifespan.

NACCHO also appreciates the inclusion of measures to address the social determinants of health but encourages the Committee to take a place-based approach reflective of social and community context. There are structural factors for populations, communities, and neighborhoods that can create an environment that affects health outcomes. NACCHO has submitted recommendations through the online portal that focus on place as central to the health outcomes for individuals, such as proportion of jobs at a living wage, full employment (including healthcare benefits), and fair workweek policies. Shifting the focus to place and structural factors can allow communities to prioritize their activities in order to create the conditions in which all people have the opportunity to be healthy.

Thank you again for the opportunity to weigh in on the important objectives of Healthy People 2030. Local health departments are grateful for the opportunity to work with partners at the federal and state level to improve the health of all Americans. For additional information, please contact Adriane Casalotti, Chief of Government and Public Affairs, at [acasalotti@naccho.org](mailto:acasalotti@naccho.org) or 202-507-4255.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Tremmel Freeman". The signature is fluid and cursive, with a long horizontal flourish at the end.

Lori Tremmel Freeman, MBA  
Chief Executive Officer