

November 5, 2018

Martin J. Vincent
Office of the Associate Director for Policy
Centers for Disease Control and Prevention
1600 Clifton Road NE, Mail Stop D-28
Atlanta, Georgia 30329

Re: Surgeon General’s Call to Action: “Community Health and Prosperity” [Docket No. CDC–2018–0082]

Dear Mr. Vincent:

On behalf of nearly 3,000 county and city health departments responsible for safeguarding the health of millions of Americans, the National Association of County and City Health Officials (NACCHO) provides the following comments on the Surgeon General’s Call to Action “Community Health and Prosperity” [Docket No. CDC–2018–0082].

Local public health departments are the governmental agencies that work every day in their communities to prevent disease, promote wellness, and protect health. They organize community partnerships, including with local businesses and the private sector, and facilitate important conversations with a number of stakeholders about how to create the conditions in which all people can be healthy. NACCHO provides resources, develops programs, and promotes national policies that support effective public health practice in local communities across America. The work of local health departments and NACCHO, in partnership with the private sector, improves economic well-being, educational success, and nation-wide competitiveness community by community. As such, NACCHO applauds the Surgeon General’s focus on community health as his signature priority.

In addition to the recommendations and examples provided by Trust for America’s Health, whose response to this Call to Action we have endorsed, we would like to provide the following comments based upon our capacity-building work with local health departments and our state, national, and federal partners:

- **Investments in community health results in lower health costs, including for employers, employees, and their families.**
 - For example, supporting communities in upgrading or buying water fluoridation equipment¹ has several population health benefits, including preventing dental decay (an estimated 51 million school hours are lost each year due to dental- related illness) and decreasing health care costs (every \$1 invested in water fluoridation saves \$20 in dental treatment costs).



- **Investing in local and regional approaches to community health and wellbeing works.**
 - Initiatives such as [SOAR \(Shaping Our Appalachian Region\)](#), in which the business sector works in partnership with public health, healthcare, policymakers, and other sectors to improve employment and community health by employing evidence-informed approaches, are a blueprint for success. This includes responding to public health crises, including the opioid epidemic, which is a focus of the [HEAL \(Help End Addiction for Life\)](#) initiative in Letcher Count, Kentucky.
 - Additional examples can be found through the [Build Healthy Places Network](#), which is supported by the Federal Reserve Bank of San Francisco, the Robert Wood Johnson Foundation, and the Public Health Institute. This includes the Healthy Communities Initiative, which deepens collaboration across the sectors of community development, finance, population health, and public health.

- **Private sector engagement in community health assessment and planning strengthens population health, including by addressing the social determinants of health.**
 - Community health assessment and planning activitiesⁱⁱ are fundamental practices of local and state health departments (C/SHAs-C/SHIPs), hospital systems (IRS Section 990 Schedule H, regarding community benefit), and federally qualified health centers (IRS Section 330, regarding conducting needs assessments) to collaboratively identify the health needs and priorities of the populations they serve and develop and implement effective strategies to protect and improve community health. Having the business community included in these efforts is key to ensuring that the local public health system is responsive to the needs of employers and that they are included as an integral part of that system. This includes helping ensure that health initiatives support a healthy and productive workforce and promote community vitality and prosperity, particularly by addressing the social determinants of health, including employment, education and job training, housing, and poverty.ⁱⁱⁱ NACCHO recommends that the private sector more actively engage in community health assessment and planning efforts in their communities.

- **City and county health departments are key facilitators of community health in partnership with the business community.**
 - Local health officials (LHOs) serve as the Chief Health Strategist^{iv} in the communities they serve, driving local public health transformation and bringing together community members and partner organizations for collective impact on the social determinants of health. In this role as neutral conveners of stakeholders and facilitators of collective strategic action, LHOs have an established history of engaging the business community to protect and improve community health. NACCHO supports LHOs in forming and leveraging effective partnerships with the private sector and welcomes opportunities to maximize these relationships that strengthen population health.

NACCHO appreciates the opportunity to provide input to the Surgeon General’s call. As an essential governmental public health partner, we look forward to continuing to work with the office of the Surgeon General to realize its goals. Please contact Eli Briggs, Senior Director of Government Affairs, for further information at 202-507-4194 or ebriggs@naccho.org.

Sincerely,

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

Lori Tremmel Freeman, MBA
Chief Executive Officer

ⁱ <https://www.naccho.org/programs/community-health/community-water-fluoridation>

ⁱⁱ <https://www.naccho.org/programs/public-health-infrastructure/performance-improvement/community-health-assessment>

ⁱⁱⁱ <https://www.healthypeople.gov/2020/topics-objectives/topic/social-determinants-of-health>

^{iv} <https://www.naccho.org/uploads/downloadable-resources/NACCHO-PH-3.0-Issue-Brief-2016.pdf>