



National Association of County & City Health Officials

The National Connection for Local Public Health

February 8, 2016

Ms. Corinna Dan, RN, MPH
U.S. Department of Health and Human Services
200 Independence Ave. SW., Room 443H
Washington, DC 20201

RE: Viral Hepatitis Action Plan-Community Stakeholder Activities Request for Information (VHAP-2015RFI)

Dear Corinna,

On behalf of the National Association of County and City Health Officials (NACCHO), I am writing to respond to the Department of Health and Human Services (HHS) Viral Hepatitis Action Plan Community Stakeholder Activities Request for Information. NACCHO is the voice of approximately 2,800 local health departments across the country. These city, county, metropolitan, district, and tribal departments work every day to protect and promote health and well-being for all people in their communities.

Local health departments play a critical role in responding to viral hepatitis. In their capacity at the local level, local health departments are on the frontlines of efforts to achieve the goals of the *Action Plan for the Prevention, Care, & Treatment of Viral Hepatitis*. Local health departments lead and support an array of services and activities to address viral hepatitis, including surveillance, prevention, outbreak control, education and outreach, vaccination for hepatitis A and B virus, and provision of or referral to diagnosis, care, and treatment. Additionally, local health departments are critical safety net providers for populations disproportionately affected by viral hepatitis, and are committed to addressing health inequities and reducing health disparities related to viral hepatitis outcomes.

In the first quarter of 2014, NACCHO conducted a needs assessment among local health departments to establish a greater understanding of activities, challenges, opportunities, and needs within the context of evolving and new opportunities to address viral hepatitis, in particular hepatitis C. The assessment highlighted the wide array of hepatitis-related efforts local health departments are engaged in and identified opportunities for local health departments to play an expanded role in our national response to viral hepatitis. The assessment also identified numerous challenges faced by local health departments, including little to no designated funding to address viral hepatitis, a very limited surveillance infrastructure, lack of staff capacity, and overwhelming disease burdens. Many local health departments reported that they were unaware of or had never engaged with their state viral hepatitis prevention coordinator, and were unfamiliar with other sources of information and support. The assessment confirmed the need for an increased focus on education and awareness raising at the local level.

To help meet the needs of local health departments and increase their capacity to respond to viral hepatitis, NACCHO has undertaken a number of activities, which are highlighted below:



Local Health Departments and Hepatitis C: An Education Series by NACCHO

To increase local health department awareness and knowledge of hepatitis C virus (HCV) diagnosis and linkage to care strategies, policies, and best practices, NACCHO launched an online educational series on May 1, 2015. The first module in the series, titled "Hepatitis C Virus: An Overview and Introduction to the Role of Local Health Departments," includes four webcasts (i.e., pre-recorded lectures) that address the following topics: the epidemiology of hepatitis C in the United States, advances in treatment for hepatitis C, hepatitis C testing recommendations, and our domestic response to hepatitis. The webcasts were presented by leaders in the field at the national and local level (see detail below). On May 6, 2015, NACCHO held a webinar with the webcast presenters to provide an overview of the module and answer questions from local health department staff and other participants. The webinar was attended by 258 participants from 33 states, and to date, 787 individuals have accessed the educational series.

The educational series is available at <http://archived.naccho.org/topics/HPDP/hepatitis-c.cfm>. The module curriculum is outline below.

1. Hepatitis C: Where Are We Now?
Presented by John W. Ward, MD, Division of Viral Hepatitis, CDC
2. The National Viral Hepatitis Action Plan
Presented by Corinna Dan, RN, MPH, Office of HIV/AIDS and Infectious Disease Policy, HHS
3. Viral Hepatitis C Testing Recommendations for Persons Born 1945-1965
Presented by Claudia Vellozzi, MD, MPH, Division of Viral Hepatitis, CDC
4. Leveraging Partnerships to Address Hepatitis C: Philadelphia's Model
Presented by Alex Shirreffs, MPH, Philadelphia Department of Public Health

A second module for the educational series is under development. The module will focus on strategies to increase HCV diagnosis and linkage to care, and will highlight best practices from local health departments across the country. It will be available by June 30, 2016.

The Role of Local Health Departments across the Hepatitis C Virus Continuum of Care: A NACCHO Consultation

In August 2015, NACCHO convened a stakeholder consultation with 20 local health department representatives from across the country. The following jurisdictions were represented by the meeting participants: Marin, CA; San Francisco, CA; Denver, CO; Volusia, FL; Champaign-Urbana, IL; Indianapolis, IN; Louisville, KY; Baltimore, MD; St. Louis, MO; Durham, NC; New York, NY; Portsmouth, OH; Philadelphia, PA; Houston, TX; Seattle, WA; Tacoma-Pierce, WA; and Cabell-Huntington; WV.

The meeting aimed to assess the current landscape for local health departments as it relates to HCV, identify the various roles and responsibilities of local health departments across the HCV care and treatment continuum, discuss existing partnerships and new opportunities for local health departments to work with their healthcare and community partners, and gather information on educational and resource needs to support local health department efforts to increase HCV testing and linkage to care. Additionally, the consultation provided a forum for local health departments to learn from each other, collectively problem solve, and exchange information about best practices, strategies for overcoming barriers, and leveraging opportunities to expand services.

The meeting participants represented a diverse selection of communities. The differences in services and programs offered by each of the health departments reinforced findings from the 2014 needs assessment that there are a number of ways that local health departments can work to improve HCV

outcomes. The challenges identified were also reinforced, and some new challenges were raised, including:

- Restrictions to accessing hepatitis C treatment;
- Not enough healthcare providers to refer individuals to for confirmatory testing, care, and treatment;
- Limited linkage to care and care coordination services for hepatitis C; and
- A growing opioid epidemic that is contributing to significant increases in the rates of incident cases, which is exacerbated by insufficient resources for prevention efforts (e.g., syringe service programs, medication-assisted therapy).

Despite these challenges, participants shared examples of how they are initiating and expanding efforts to address hepatitis C, including:

- Building coalitions that engage a diverse group of stakeholders and disciplines, such as healthcare providers, healthcare payers, patient advocates, substance abuse, mental health, local businesses, and the faith community, to maximize limited resources;
- Leveraging HIV program infrastructure and expertise; and
- Using additional data sources, such as electronic health records and lab reports, to supplement surveillance data.

Public Health Detailing Kit for Hepatitis C

Public health will need to work closely with the healthcare system in order to effectively address hepatitis C. Just as awareness and education are needed among local health departments, increased knowledge and capacity is needed within the healthcare context. To increase healthcare provider capacity to prevent, diagnose, and treat hepatitis C, NACCHO is working to develop a public health detailing kit for use by local health departments with providers in their community. Public health detailing is a healthcare provider outreach model used to promote good public health practice within the provider's office. The detailing kit, which will be available by June 30, 2016, will be available online and will include a number of tools and resources that local health departments can customize and compile to meet their local needs. The detailing kit will be accompanied by a webinar and other resources provide by NACCHO to share strategies and best practices for outreach and education to healthcare providers.

HCV Testing and Linkage to Care Workgroup

To provide guidance and input on its HCV-related programmatic work, NACCHO formed a workgroup composed of 14 local health department staff from the following jurisdictions: San Francisco, CA; Denver, CO; Wethersfield, CT; Connecticut (State Viral Hepatitis Prevention Coordinator); Northern Kentucky, KY; St. Louis, MO; Orange, NY; New York, NY; Columbus, OH; Miami, OH; Philadelphia, PA; Seattle, WA; Tacoma-Pierce, WA; and Wood County, WI. Workgroup members represent local health departments that are leading efforts to respond to HCV and individuals that are dedicated to expanding and improving efforts at the local level.

Healthcare-Associated Infections

NACCHO is strengthening the capacity of local health departments to prevent healthcare-associated infections (HAIs) by providing technical assistance to demonstration sites in DuPage County (IL), the Florida Department of Health in Orange County, and the Philadelphia Department of Public Health (PA).

These demonstration sites are strengthening relationships with community partners, developing educational materials, obtaining certification in infection control, improving outbreak response efforts, and informing the development of a guidance document that will outline roles and opportunities for local health departments to prevent and reduce HAIs in coordination with state health departments.

Immunization

NACCHO's Immunization program provides support, capacity building assistance, and leadership to strengthen the ability of local health department immunization programs and their partners to prevent and control vaccine-preventable disease, including hepatitis A and B. NACCHO does this by 1) increasing the number of national policies, guidance documents, and decisions related to immunization that are informed by local health department input; 2) providing the local health department perspective during national policy and programmatic discussions; 3) collecting, organizing, and disseminating immunization-related recommendations, evidence-based strategies, tools, and resources; and 4) evaluating selected model practices and tools for accessibility, utility, and impact.

Policy and Advocacy

As the national voice for local health departments, NACCHO works to inform policymakers about the critical role local health departments play in keeping their communities healthy and safe and advocates on behalf of local health departments with federal policymakers for adequate resources, appropriate public health legislation, and sensible policies to address the myriad of challenges facing communities. NACCHO's policy statements support these efforts. In 2014 and 2015, NACCHO updated two hepatitis-related policy statements to incorporate the most up-to-date knowledge and information: [Viral Hepatitis Prevention](#), which calls for increased funding and support for local health department viral hepatitis programs, and [Syringe Services Program](#), which supports a comprehensive and evidence-based approach to syringe services programs. Additionally, in 2014 and 2015, NACCHO signed onto the following viral hepatitis-related letters to Congress and the Administration:

- [Joint Formal Request for a National Coverage Determination for Screening for Hepatitis B Virus Infection Among High Risk Individual](#)
- [Joint Letter to President Obama on Adequately Funding Domestic HIV Programs in the FY2016 Budget](#)
- [Joint Formal Request to the Office of Management and Budget for the Division of Viral Hepatitis in the FY2017 Budget](#)

NACCHO applauds the creation and update of the National Viral Hepatitis Action Plan and the leadership HHS has provided in coordinating federal partners around meaningfully addressing viral hepatitis in the United States. We appreciate the opportunity to provide input on this important topic and look forward to continuing to support and advance the local health department response to viral hepatitis. If you have any questions, please contact Gretchen Weiss, Director, HIV, STI, and Viral Hepatitis, at 202-507-4326 or gweiss@naccho.org.

Sincerely,



LaMar Hasbrouck, MD, MPH
Executive Director