

November 20, 2023

Paul Reed
Deputy Assistant Secretary for Health
Office of Disease Prevention and Health Promotion,
U.S. Department of Health and Human Services,
1101 Wootton Parkway, Suite 420,
Rockville, MD 20852

RE: Solicitation of Written Comments on Healthy People 2030 Objectives

Deputy Assistant Secretary Reed,

The National Association of County and City Health Officials (NACCHO) appreciates the opportunity to provide comments on the current Healthy People 2030 Objectives. NACCHO represents the over 3,000 local health departments across the country. 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 associated measures are reflective of the breadth of important activities, programs, and policies that will have an impact on health across the nation.

NACCHO has supported Healthy People since its inception, including engaging our members in the Committee process, facilitating member listening sessions, and building local capacity to use Healthy People through project plan work led by NACCHO's Public Health Infrastructure and Systems Team. NACCHO has been recognized officially as a Healthy People 2030 Champion by the U.S. Department of Health and Human Services (HHS) Office of Disease Prevention and Health Promotion (ODPHP), which notes our commitment in helping our local health department members in working toward Healthy People's overarching goals and objectives in their communities and service areas.

NACCHO offers the following proposed changes and new objectives for your consideration.

Infectious Disease

NACCHO appreciates that ODPHP's leadership established several developmental objectives in Healthy People 2030, including *increasing the proportion of people with vaccination records in an information system (IID-D02)* and *increasing the proportion of adults age 19 years or older who get recommended vaccines (IID-D03)*. These will be good indicators of data completeness in the immunization information system, which lagged during COVID-19 pandemic. We welcome opportunities to support efforts to move these developmental objectives forward.



Sexually Transmitted Infections – Proposed Changes

NACCHO recommends adding women to population groups associated with several objectives related to the topic of Sexually Transmitted Infections:

- Increase linkage to HIV medical care — HIV-04
- Increase knowledge of HIV status — HIV-02
- Increase viral suppression — HIV-05

Sexually Transmitted Infections – New Proposed Objectives

To address the needs of underserved populations, NACCHO proposes adding a new objective aimed at increasing the proportion of women and transgender women indicated for PrEP who are prescribed it. A disproportionately low number of women and transgender women who could benefit from PrEP are using it, often due to low awareness by both clients and providers of the benefits of PrEP prescription. According to CDC, in 2019, only ten percent of women who could benefit from PrEP were prescribed it.¹ While PrEP awareness was common among HIV-negative transgender women (92%), PrEP use was significantly less common (32%).²

In addition, NACCHO proposes adding an objective aimed at reducing time between diagnosis and HIV medical care. Research has shown that early linkage to HIV treatment (i.e. same-day or within 7 days of HIV diagnosis or re-engagement) increases retention in care and reduces time to viral suppression among people living with HIV.³

Health Policy – New Proposed Objective

Taking concrete steps to end stigma and discrimination at all levels is a critical step in decreasing barriers to HIV prevention, testing, care, and treatment. The steps to end stigma and discrimination must include standing against unjust HIV criminalization laws. HIV criminalization exacerbates stigma against people living with HIV and disenfranchised communities. It discourages those at risk from getting tested for HIV and some people living with HIV from seeking treatment, making it more difficult to disclose one's HIV positive status.⁴ NACCHO recommends adding an objective to decrease the number of states, territories, and DC with HIV-specific criminal codes or criminal regulations related to HIV status.

Drug and Alcohol Use – Proposed Changes to Existing Objectives

NACCHO recommends expanding the objectives, *Reduce the proportion of people who used heroin in the past year (SU-16)* and *Reduce the proportion of people who started using heroin in the past year (SU-17)*, to include other illicit opioids such as fentanyl. While the use of heroin remains a concern, heroin use and overdoses have decreased as illicit fentanyl use has increased.⁵

Centers for Disease Control and Prevention. Monitoring selected national HIV prevention and care objectives by using HIV surveillance data—United States and 6 dependent areas, 2019. *HIV Surveillance Supplemental Report* 2021;26(No.2). <http://www.cdc.gov/hiv/library/reports/hiv-surveillance.html>. Published May 2021. Accessed 11/17/23.

² Centers for Disease Control and Prevention. HIV Infection, Risk, Prevention, and Testing Behaviors Among Transgender Women—National HIV Behavioral Surveillance, 7 U.S. Cities, 2019–2020. *HIV Surveillance Special Report* 27. <http://www.cdc.gov/hiv/library/reports/hiv-surveillance.html>. Published April 2021. Accessed 11/17/23.

³ Ford N, Migone C, Calmy A, et al. (2018). Benefits and risks of rapid initiation of antiretroviral therapy. *AIDS (London, Eng)*, 32(1), 17–23.

⁴ [Sero-Project-National-HIV-Criminalization-Survey-Report-2021.pdf \(seroproject.com\)](#)

⁵ [Understanding the Opioid Overdose Epidemic | Opioids | CDC](#)



Drug and Alcohol Use – New Proposed Objectives

NACCHO recommends adding objectives that would increase the proportion of people with substance use disorder who receive or are referred to harm reduction services during emergency room visits and increase the proportion of people who use drugs who visit a harm reduction program in the past year. Syringe service programs (SSPs) and other harm reduction strategies have played a critical role in the prevention of HIV and viral hepatitis and the reduction of other harms associated with substance use for more than 30 years.^{6,7} SSPs and other harm reduction strategies are critical components of the response to the opioid epidemic, preventing the spread of HIV and viral hepatitis and reducing overdose mortality.

Furthermore, SSPs and other harm reduction strategies can reduce substance use, connect people to treatment and prevent overdoses. People who inject drugs who regularly use an SSP are five times as likely to access substance use treatment and three times as likely to reduce or stop injection drug use than people who inject drugs who have never used an SSP.⁸ In addition to these objectives, NACCHO recommends adding an objective to increase the proportion of pregnant people with opioid use disorder who receive Medications for Opioid Use Disorder during and in the year following pregnancy.⁹

Adolescents – Proposed Changes

NACCHO recommends revising the language used to describe substance use as “risky” and shift toward language that emphasizes harm reduction and reduces stigma. For example, *Increase the proportion of adolescents who think substance abuse is risky (SU-R01)* could instead be “adolescents who understand harms associated with substance abuse.”

Family Planning – Proposed Changes

NACCHO recommends ensuring that people with capacity for pregnancy who may not identify as women are included in multiple objectives associated with the Family Planning topic for Healthy People 2030. For example, NACCHO recommends including all people with the capacity for pregnancy in the objective *Increase the proportion of women who get needed publicly funded birth control services and support (FP-09)*.

In addition, according to CDC data, transgender youth experience disparities in sexual risk compared with their cisgender peers.¹⁰ NACCHO also recommends including trans, non-binary, and gender expansive youth in the populations measured under the following objectives:

⁶ Aspinall, E. J., Nambiar, D., Goldberg, D. J., Hickman, M., Weir, A., Van Velzen, E., ... & Hutchinson, S. J. (2013). Are needle and syringe programmes associated with a reduction in HIV transmission among people who inject drugs: a systematic review and meta-analysis. *International Journal of Epidemiology*, 43(1), 235-248.

⁷ Bernard, C. L., Owens, D. K., Goldhaber-Fiebert, J. D., & Brandeau, M. L. (2017). Estimation of the costeffectiveness of HIV prevention portfolios for people who inject drugs in the United States: A model-based analysis. *PLoS Med*, 14(5). doi:10.1371/journal.pmed.1002312

⁸ CDC. (2019, May 23). Summary of Information on The Safety and Effectiveness of Syringe Services Programs (SSPs). Retrieved December 3, 2019 from <https://www.cdc.gov/ssp/syringe-services-programs-summary.html>

⁹ Tabatabaeepour N, Morgan JR, Jalali A, Kapadia SN, Meinhofer A. Impact of prenatal substance use policies on commercially insured pregnant females with opioid use disorder. *J Subst Abuse Treat*. 2022 Sep;140:108800. doi: 10.1016/j.jsat.2022.108800. Epub 2022 May 10. PMID: 35577664; PMCID: PMC9357143.

¹⁰ Johns MM, Lowry R, Andrzejewski J, Barrios LC, Demissie Z, McManus T, Rasberry CN, Robin L, Underwood JM. Transgender Identity and Experiences of Violence Victimization, Substance Use, Suicide Risk, and Sexual Risk Behaviors Among High School Students - 19 States and Large Urban School Districts, 2017. *MMWR Morb Mortal Wkly Rep*. 2019 Jan 25;68(3):67-71. doi: 10.15585/mmwr.mm6803a3. PMID: 30677012; PMCID: PMC6348759.



- Increase the proportion of adolescent females who used effective birth control the last time they had sex — FP-05
- Increase the proportion of adolescent males who used a condom the last time they had sex — FP-06
- Increase the proportion of adolescents who use birth control the first time they have sex — FP-07

Pregnancy & Childbirth— New Proposed Objective

Pregnant women have a higher risk of more severe illness from coronavirus (COVID-19) than nonpregnant women. As COVID-19, RSV, and other respiratory viruses remain common with the seasonal flu, NACCHO recommends adding an objective to increase the number of pregnant people with COVID-19 and RSV immunizations. Data from clinical trials show that the recommended RSVpreF (Abrysvo) vaccine is safe and efficacious for use in pregnant people to prevent severe RSV disease in infants from birth through 6 months of age.¹¹

Health Communication—Proposed Changes

NACCHO requests where there are objectives that would provide resources for state departments, including, *Increase the number of state health departments that use social marketing in health promotion programs (HC/HIT-D01)*, that local health departments be included as a critical component of the governmental public health infrastructure. Local public health departments work every day in their communities to prevent disease, promote wellness, and protect health and are trusted messengers in their communities and most local health departments are independent of the state health department.

Social Determinants of Health – Proposed Changes

With the increased attention placed on the importance of social and structural determinants of health and their impact on health inequities, NACCHO is pleased to see that Healthy People 2030 dedicated additional core, developmental, and research objectives that align with key social determinants of health (SDOH) domains, and incorporated SDOH into the overarching goals. Specifically, NACCHO was pleased to see the SDOH objective, *Increase the proportion of the voting-age citizens who vote* (SDOH-07). Including structural determinants of health in Healthy People 2030 will create a clear connection between current SDOH objectives, the structural determinants of health that generate health inequities, and allow communities to better identify and address root causes.

However, the majority of Healthy People 2030's objectives are focused on clinical and behavioral outcomes, and NACCHO recommends that more population health-level, SDOH objectives be added, and structural determinants or root causes of health inequities are incorporated. We recommend developing objectives that consider indices that depict inequities that stem from social injustices, such as the Environmental Justice Index¹², Area Deprivation Index¹³, and the Social Vulnerability Index¹⁴.

¹¹ [Healthcare Providers: RSV Vaccination for Pregnant People | CDC](#)

¹² ATSDR (2023, July 20). Environmental Justice Index. Agency for Toxic Substances and Disease Registry. Retrieved November 16, 2023, from <https://www.atsdr.cdc.gov/placeandhealth/eji/index.html>

¹³ Center for Health Disparities Research University of Wisconsin School of Medicine and Public Health (n.d.). *Neighborhood Atlas*. Neighborhood Atlas. Retrieved November 16, 2023, from <https://www.neighborhoodatlas.medicine.wisc.edu/>

¹⁴ ATSDR (2023, July 12). *CDC/ATSDR Social Vulnerability Index*. Agency for Toxic Substances and Disease Registry. Retrieved November 16, 2023, from <https://www.atsdr.cdc.gov/placeandhealth/svi/index.html>



NACCHO

National Association of County & City Health Officials

The National Connection for Local Public Health

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 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 or 202-507-4255.

Sincerely,



Lori Tremmel Freeman, MBA
Chief Executive Officer

