

January 22, 2019

The Honorable Alex Azar, Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Via electronic submission to HP2030@hhs.gov

Dear Secretary Azar,

Thank you for the opportunity to comment on the proposed Healthy People 2030 (HP2030) national objectives for improving the health of all Americans. The measurable objectives established by the decades-long Healthy People initiative are tracking improvements in the health of all Americans and serve as a guide to empowering individuals, communities, and providers to improve health and health care systems.

That being said, we offer our concerns that references to serious and advanced illness are not found in chapters throughout the document where there are appropriate health care concerns faced by many Americans.

Our specific comments follow:

Cancer

- **C-2030-03, C-2030-05, C-2030-07, C-2030-09:** All of these objective statements mention measures to follow guidelines for cancer screening. For those patients with advanced illness, standard screening may not make sense or may be unnecessary and was recently excluded from HEDIS measures for that reason. Language in HC2030 could be adjusted for each of these measures as follows: “follow guidelines, as appropriate, for.....”
- **C-2030-11:** This objective statement mentions increasing the 5-year survival rate for cancer. It is striking that there is not a separate objective statement to promote quality of life for patients with cancer or a mention of concordance with patient wishes for treatment and at the end of life.
- **Other topics that should be included in this section:**
 - The benefit of palliative care from diagnosis on
 - Advance care planning and goals of care conversations to determine preferences for treatment
 - Referral to hospice for care nearing the end of life

ECBP (Educational and Community-Based Programs)

- Consider an objective statement that tracks completion of advance care planning documents. Measurement could be tracked by the use of the advance care planning codes in Medicare Part B billing, as one example.

Other Disease-Specific Chapters

HDS (Heart Disease and Stroke), RD (Respiratory Diseases)

- We have concerns about a lack of focus on patients with advanced stages of these diseases, particularly with a mention of quality of life when living with a serious illness and the need/ability to have patient-determined goals of care. We suggest that there be consideration for:
 - Advance care planning conversations to determine preferences for treatment and at end of life care
 - The benefit of palliative care from diagnosis on
 - Referral to hospice for care nearing the end of life

OA (Older Adults)

- In this chapter, there is focus on specific conditions, such as urinary tract infections and pneumonia, and on reducing hospital admissions. However, there is no mention of advance care planning, patient quality of life or patient goal concordance. Consideration should be given for, at a minimum, an objective statement on advance care planning conversations.
- There also needs to be recognition that health for frail older adults looks different than for other older adults but is no less important and things like support for the person and their family are key.

SCOH (Social Determinants of Health)

- We note in this chapter that the focus of the objective statements is almost solely focused on children and poverty but does not recognize older adults with any chronic or advanced illness and the role that various social determinants of health might play. Please consider adding an objective statement that specifically references older adults and their health conditions.

SU (Substance Abuse)

- Consider an objective statement that measures drug disposal. Measurement could include results of DEA Drug Take Back programs and the volume of drugs received during those days.
- Also consider that those who legitimately need and benefit from opioids should have access to them without delay or complications in obtaining them.

Thank you for the opportunity to comment on Healthy People 2030. We look forward to further collaboration on our suggestions and enhancements to the document.

Sincerely,

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