



January 17, 2019

Alex M. Azar, II
Secretary of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

RE: Healthy People 2030 Objectives

Trinity Health is pleased to submit our feedback in response to the request for comments on Healthy People 2030 Objectives. We appreciate the Department of Health and Human Services commitment to using Healthy People 2030 objectives to advance critical public health priorities by addressing the leading causes of morbidity and mortality and driving action at the national, state, and local levels. Trinity Health has been providing input on the HP 2030 framework and objectives since the beginning. We are pleased to have the opportunity to provide our comment on the proposed objectives in this letter.

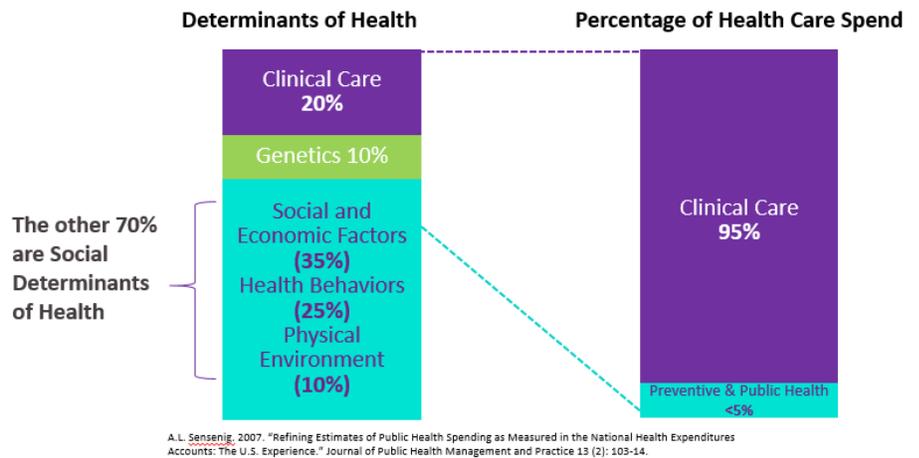
Trinity Health is one of the largest multi-institutional Catholic health care delivery systems in the nation, serving diverse communities that include more than 30 million people across 22 states. Trinity Health includes 94 hospitals, as well as 109 continuing care locations that include PACE programs, senior living facilities, and home care and hospice services. Its continuing care programs provide nearly 2.5 million visits annually.

Based in Livonia, Mich., and with annual operating revenues of \$18.3 billion and assets of \$26.2 billion, the organization returns \$1.1 billion to its communities annually in the form of charity care and other community benefit programs.

Trinity Health employs about 133,000 colleagues, including 7,800 employed physicians and clinicians. Committed to those who are poor and underserved in its communities, Trinity Health is known for its focus on the country's aging population. As a single, unified ministry, the organization is the innovator of Senior Emergency Departments, the largest not-for-profit provider of home health care services — ranked by number of visits — in the nation, as well as the nation's leading provider of PACE (Program of All Inclusive Care for the Elderly) based on the number of available programs.

Trinity Health is building a people-centered health system that includes episodic care, population health management and Community Health and Well-Being (CHWB). Community Health & Well-Being optimizes wellness and equity, and eliminates disparities in our communities.

In the United States, health care spend is almost entirely focused on clinical care, not preventative or public health. However, clinical care and genetics account for only 30 percent of the factors that impact the health of populations.



To deliver the Triple Aim for populations and communities, Trinity Health as a people-centered health system is working to address all determinants of health, not just episodic clinical health care. The activities of CHWB are aimed at addressing the other 70 percent of the determinants.

Trinity Health and the HP 2030 Framework

As Trinity Health is working more intentionally to address the social determinants of health (SDoH), we are pleased to see the inclusion in the HP 2030 objectives of many new core, developmental and research objectives related to tobacco and obesity (particularly the attention to physician offices providing counseling to patients) SDoH, opioids, gun violence and diabetes. All of these areas are part of our national strategy and we look forward to the national benchmarks established for these proposed objectives.

Trinity Health Overall Comments on Proposed objectives

Trinity Health appreciates the organization of the objectives into core, developmental and research as we recognize the complexity of improving the health of all Americans and understand that some data do not yet exist to fully understand the health of our nation. The reduction in the number of overall objectives allows for more comprehensive monitoring of a larger set of objectives. The addition of the opioid category is responsive to the increase in opioid overdoses and deaths across the country. We are also excited to see how the objectives are categorized both by population of people, disease state and social and economic conditions that affect Americans.

Trinity Health Proposes Additional Objectives and considerations:

- The HP 2030 objectives could be better aligned with public health, prevention, and quality initiatives and priorities across the Department. For instance, a number of measures used in Medicare programs and goals included in national vaccination plans are not included in the HP 2030 objectives.
- There are opportunities to recommend objectives that are priorities from the Centers for Medicare and Medicaid Services (CMS) perspective, including measuring improvements

in care coordination across providers, reduction in all-cause readmissions, and addressing social determinants of health (SDoH) to improve health outcomes, among other priorities.

- The proposed objective set only includes 2 objectives for adult immunizations. The first is a core objective for lifespan influenza immunization, and the second is a developmental objective to increase the percentage of pregnant women that receive the Tdap vaccination. This is down from 8 objectives focused on adult immunizations in HP2020. At a minimum, we recommend that Pneumococcal vaccine and shingles vaccine be considered.
- There are multiple diabetes objectives and we recommend that HP 2030 distinguish between type 1 and type 2 diabetes.

Sincerely,



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