

January 17, 2019

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

RE: Healthy People 2030 – Proposed Objectives for 2030

Submitted electronically via HP2030@hhs.gov

Dear Secretary Azar,

UnityPoint Health (“UPH”) appreciates this opportunity to provide input on the proposed core, developmental, and research objectives for Healthy People 2030. UPH is one of the nation’s most integrated healthcare systems. Through more than 30,000 employees and our relationships with more than 290 physician clinics, 38 hospitals in metropolitan and rural communities and 15 home health agencies throughout our 9 regions, UPH provides care throughout Iowa, central Illinois and southern Wisconsin. On an annual basis, UPH hospitals, clinics and home health provide a full range of coordinated care to patients and families through more than 6.2 million patient visits. In addition, several UPH affiliates administer public health contracts and public health agencies are valued community partners.

UPH appreciates the time and effort of HHS in developing and proposing these objectives and respectfully offers the following comments.

GENERAL COMMENTS

HHS is proposing a streamlined set of national health objectives. There are three objective types: Core, developmental and research. Core objectives are the central evidence-based objectives for which the 2030 Healthy People targets will be set. Developmental objectives represent high priority issues but they lack reliable baseline data. Research objectives represent key opportunities related to health or economic burden or population disparities but they have had limited research support. Both developmental and research objectives have the potential to be included as a core objective if their evidence basis is strengthened prior to 2030. In this draft, there are 41 proposed topics with 358 core objectives, 79 developmental objectives and 25 research objectives.

- **Comment:** UnityPoint Health supports the establishment of science-based, 10-year national objectives for improving the health of all Americans. We are particularly encouraged that for 2030,

HHS is striving to provide a “smaller, more focused set of objectives that reflects national actionable priorities to improve health.”

In our review of the proposed objectives, we have two observations. First, we are still concerned about the sheer number of proposed objectives – there are a total of 462 objectives being considered for comment with more being solicited. While this is a reduction from more than 1,200 objectives identified in 2020, we believe that this number is still too many to allow resources and efforts to be effectively channeled and targeted. We would urge HHS to reduce the number of topics, which has increased almost three-fold since 1990, and limit the number of objectives under each objective.

Second, although we understand that Healthy People objectives are rooted in public health, we would encourage HHS to examine how these objectives (being established for all Americans) align with priorities set by HHS for healthcare professionals and facilities and contracted health plans in the context of Medicaid, Medicare or other federal funding. For instance, many of the performance measures required by HRSA funding for Federally Qualified Health Centers correspond to Healthy People topics. Likewise, quality reporting for Medicare ACOs and Medicare Advantage Plans also contain components that align with some of the Healthy People topics. It would be our hope that HHS would consider incorporating a larger lens in its deliberation of these objectives and leverage the work being pursued under other HHS programs. We believe this larger lens will break down silos between public health versus other healthcare delivery systems as well as further support how these objectives are being accomplished collectively for all Americans.

We are pleased to provide input of the development of the Healthy People 2030 objectives. To discuss our comments or for additional information on any of the addressed topics, please contact Sabra Rosener, Vice President, Government and External Affairs at sabra.rosener@unitypoint.org or 515-205-1206.

Sincerely,



Sabra Rosener
VP, Government & External Affairs
UnityPoint Health