
Protect, Prevent, Live Well

January 13, 2011

U.S. Surgeon General Regina Benjamin, MD
Department of Health and Human Services
Office of the Surgeon General
200 Independence Avenue, SW
Washington, DC 20201

Dear Dr. Benjamin:

On behalf of the American Public Health Association (APHA), the oldest and most diverse organization of public health professionals and advocates in the world dedicated to promoting and protecting the health of the public and our communities, I thank you for the opportunity to comment on the Draft Vision, Goals, Strategic Directions and Recommendations of the National Prevention Strategy. APHA applauds and supports the comprehensive nature of the Strategy and its inclusion of policy, strategies and actions that reflect priorities of the public health community.

General Comments:

There are a number of important issues that APHA urges you to address in development and implementation of the National Prevention Strategy. They include:

- Ensuring that federal agencies use the National Prevention Strategy to guide their policies, strategies and programs
- Use of the Prevention and Wellness Fund in accordance with the recommendations proposed by Trust For America's Health
- Development of a national strategy by the Department of Health and Human Services to build and maintain adequate infrastructure for federal, state, local, territorial and tribal governmental public health to prevent disease and protect health
- Create a quality improvement process that incorporates community engagement and feedback on best practices

Draft Goal:

APHA urges you to broaden the overall goal from achieving significant gains in life expectancy to achieving improvements in health status throughout the lifecycle, including gains in life expectancy.

Draft Strategic Direction and Recommendations

There are four key principles that appear to be absent in this document. They include:

(1) Ensuring adequate financing to avoid unfunded mandates; (2) Ensuring accountability for expenditures, as they relate to population health outcomes; (3) Creation, dissemination and use of standards to guide both community and provider efforts in creating environments and services that detect and prevent disease and disability; and (4) Ensuring a multi-sectoral and coordinated approach to addressing specific public health problems.

In addition to our comments above, we have a number of specific recommendations for several of the “Strategic Directions” outlined in the draft document:

Strategic Direction 2:

- Add obesity to the list of key issues.

Strategic Direction 3:

- Add to last bullet... "to effectively coordinate response to outbreaks and other public health emergencies."

Strategic Direction 4:

- Clarify "provider activity."
- Add... “provide tools and other supports for health care and community providers and systems to maximize utilization of high impact services.”
- Add as a bullet... Assure and implement requirement of first dollar coverage for clinical preventive services recommended by the US Preventive Services Task Force.

Strategic Direction 5:

- Add... "State use of tobacco settlement funds to create comprehensive tobacco prevention and control programs, as set forth by CDC.”

Strategic Direction 6:

- In the 3rd bullet, add... "government monitoring, and if necessary, more stringent regulations to ensure media compliance."

Strategic Direction 8:

- Add "safe" to physical activities across the lifespan.

Strategic Direction 9:

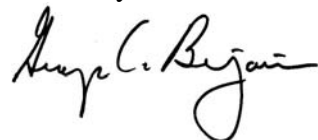
- In the 2nd bullet, add... Promote pedestrian and "bicycle" safety and injury prevention.
- Add to the 3rd bullet... "and the proper and safe use of personal devices..."
- Add to the 4th bullet: "...and schools"
- In the 5th bullet: Replace “strengthen” with "Promote use of..."

Strategic Direction 10:

- Add bullet: Strengthen community-based mental health services and prioritize their use over institutional care.
- Add bullet: Develop surveillance systems to identify mentally ill persons.
- Add bullet: Develop multi-sectoral secondary prevention strategies and services to support and manage mentally ill individuals to prevent acts of violence.

Thank you for this opportunity to provide input on this important public health initiative. Please contact me if you have any questions regarding our comments.

Sincerely,



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Executive Director