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July 6, 2021

Shalanda Young

Acting Director

The Office of Management and Budget

725 17th Street NW

Washington, DC 20503

Dear Acting Director Young:

The National Health Council (NHC) appreciates the opportunity to provide comments on the Request for Information (RFI) on Methods and Leading Practices for Advancing Equity and Support for Underserved Communities Through Government.

Created by and for patient organizations over 100 years ago, the NHC brings diverse organizations together to forge consensus and drive patient-centered health policy. We promote increased access to affordable, high-value, sustainable health care. Made up of more than 140 national health-related organizations and businesses, the NHC's core membership includes the nation's leading patient organizations. Other members include health-related associations and nonprofit organizations including the provider, research, and family caregiver communities; and businesses representing biopharmaceutical, device, diagnostic, generic, and payer organizations.

We applaud the Administration and the Office of Management and Budget (OMB) for undertaking this ambitious effort to assure all Federal resources are being used to increase equity and remove barriers and burdens for marginalized populations. While the NHC comments will focus specifically on health equity and outcomes, we recognize that this effort addresses all areas of equity.

Our specific responses to the questions raised in the Request for Information (RFI) will focus on question one on equity assessments and strategies, question two on barrier and burden reduction, and question five on stakeholder and community engagement.

Equity Assessments and Strategies

The NHC recognizes the magnitude of the Federal government's challenges to ensure its programs and initiatives consider the impact on equity. The NHC was recently tasked by our member organizations to consider the impact of our initiatives and policy priorities on health equity. To aid us in this endeavor, the NHC developed, with the approval of our [Board of Directors](#), a set of specific principles and policy screens called our [Health Equity Domains and Values](#). This tool is designed to assess health policies to ensure they advance health equity. The domains and values represent what the NHC considers as the most important areas of health equity from the patient community perspective. We use them to assess proposed policies, identify policy areas to advance, and to infuse equity considerations into all health policy. We are happy to share this tool and offer the NHC and its members as partners to help use the Domains and Values as a lens with which to review federal health programs and policies.

Additionally, the NHC knows that data quality, comprehensiveness, and consistency are critical to addressing equity. Without high-quality data, measures, and assessments, we cannot successfully reduce disparities and improve equity. To assure that measures and assessments are being applied appropriately, we recommend federal standards be set for data collection and use. Having these standards in place will ensure data are consistent across Federal agencies and programs and reflect the full range of demographic characteristics of marginalized populations. In addition, constant stakeholder engagement will ensure the right data gets collected and we are asking the right questions in the right way.

Barrier and Burden Reduction

Data quality is also critical to the issue of identifying barriers and burdens. Before we can be sure we have accurately identified barriers and burdens, we need to ensure we have comprehensive and consistent data to review. Without this, we are only anecdotally identifying barriers and burdens. While we know that barriers and burdens for marginalized populations exist in almost all Federal programs, we need to make sure we are identifying them with a data-driven approach. However, we also need to develop and collect data points that help identify burdens and barriers as quickly as possible. Lack of data to inform good decisions is not an acceptable reason to slow progress toward equity.

This RFI is an excellent opportunity for stakeholders to provide input into the barriers and burdens that exist. We recommend the Federal government build on this effort by putting robust engagement mechanisms in place so stakeholders, particularly from marginalized communities, have continuous and accessible opportunities to provide input on barriers and burdens. All Federal agencies should consistently ask stakeholders to provide input and build mechanisms to act on that input quickly.

Stakeholder and Community Engagement

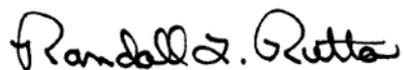
The NHC has been a leader in helping federal agencies, such as the Food and Drug Administration, develop methods for meaningfully engaging stakeholders. While most federal agencies have mechanisms for stakeholder engagement, they vary widely in effectiveness. We recommend stakeholder-engagement activities be consistent across agencies and meet minimum criteria. At the very least, engagement efforts must involve stakeholders from the very early stages of any program discussion and development. This includes the assessments and strategies from the RFI's question one. It is not enough to ask for feedback and comment on draft rules. Feedback is only reactive. Engagement must provide the opportunity to provide input from the very earliest stages of any initiative. Meaningful engagement is proactive and must be supported.

Federal agencies should also develop relationships with trusted community partners that represent marginalized communities to develop opportunities for engagement, including systems for continuous input and feedback. This will create an ongoing stakeholder engagement dialogue with the opportunity to engage diverse sources. By partnering with stakeholders that are trusted voices from marginalized communities that can provide a wide array of input, Federal agencies will have an opportunity to hear about real barriers and burdens and identify emerging issues instead of just asking for review of existing efforts on a project-by-project basis.

Conclusion

We appreciate the opportunity to provide additional input on these critical issues. Please do not hesitate to contact Eric Gascho, Vice President of Policy and Government Affairs, if you or your staff would like to discuss these issues in greater detail. He is reachable by phone at 202-973-0545 or via e-mail at egascho@nhcouncil.org.

Sincerely,



Randall L. Rutta
Chief Executive Officer