



November 20, 2023

Paul Reed, MD  
Deputy Assistant Secretary for Health  
Office of Disease Prevention and Health Promotion  
Department of Health and Human Services  
1101 Wootton Parkway, Suite 420  
Rockville, MD 20852

Submitted via [HP2030Comment@hhs.gov](mailto:HP2030Comment@hhs.gov)

**Re: Announcement of Solicitation of Written Comments on Healthy People 2030 Objectives**

Dear Dr. Reed,

The National Association of Chain Drug Stores (NACDS) writes to thank the Office of Disease Prevention and Health Promotion for the opportunity to comment on the Healthy People 2030 Objectives. NACDS would like to reiterate our strong support for the goals and objectives of the Healthy People 2030 initiative, building on [previous comments](#) submitted by NACDS in 2018 when the 5<sup>th</sup> iteration of the Healthy People initiative was announced for the decade from 2020-2030. In those comments, NACDS called attention to several key objectives well-suited for pharmacist influence with opportunity for significant public health impact. Those objectives included supporting increased access to immunizations and health screenings, improving medication adherence and chronic disease management, and supporting people with mental health and substance use disorders.

NACDS continues to strongly support the Healthy People 2030 Objectives, many of which align with activities pharmacies have undertaken to help improve the health of people and communities across the nation. In particular, since 2018, the important role of pharmacies in helping to prevent and combat infectious diseases, like COVID-19, has become even more apparent. At the same time, the Food is Medicine movement has gained momentum and pharmacies continue to engage to support the National Strategy to mitigate diet-related diseases. We have outlined key examples below highlighting how pharmacies continue to lead population health efforts responding to the nation's most critical and dynamic health and wellness needs in alignment with the Healthy People 2030 Objectives.

**HP 2030 Objective: Infectious Disease – COVID 19**

Throughout the COVID-19 pandemic, pharmacies responded to the monumental task of ensuring adequate testing, vaccination, and treatment access across the country, including in rural and other vulnerable communities, with unparalleled speed and scale. Consider that about 90% of Americans live within 1 mile of a pharmacy<sup>1</sup> and people visit pharmacies far more often than other healthcare providers. In all, over 307 million COVID-19 vaccinations have been provided by pharmacies, in addition to more than 42 million COVID-19 tests<sup>2,3</sup> and over 8 million therapeutics courses.<sup>4</sup> One study estimates that pharmacy personnel reached more than 150 million people during the pandemic

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<sup>1</sup> [https://www.japha.org/article/S1544-3191\(22\)00233-3/fulltext](https://www.japha.org/article/S1544-3191(22)00233-3/fulltext)

<sup>2</sup> <https://www.cdc.gov/vaccines/covid-19/vaccination-provider-support.html#closing-out>

<sup>3</sup> Grabenstein JD. Essential services: Quantifying the contributions of America's pharmacists in COVID-19 clinical interventions. J Am Pharm Assoc (2003). 2022 Nov-Dec;62(6):1929-1945.e1. doi: 10.1016/j.japh.2022.08.010.

<sup>4</sup> <https://www.liebertpub.com/doi/10.1089/hs.2023.0085>

and averted more than 1 million COVID-related deaths, more than 8 million hospitalizations, and \$450 billion in healthcare costs.<sup>5</sup> More than 40% of individuals vaccinated by pharmacies identified as racial or ethnic minorities<sup>6</sup> surpassing CDC's goal for the Program. Though the Public Health Emergency has ended, these successes can continue to be applied to ongoing efforts to ensure that vulnerable populations, especially children and at-risk adults, are vaccinated and protected against diseases like COVID-19, measles, pertussis, flu, and hepatitis A and B, among others. For diseases that cannot be prevented by vaccines, early diagnosis through enhanced access to health screenings at pharmacies, for example, can accelerate time to treatment and improve health outcomes. These services align closely with several Healthy People 2030 objectives across the Health Conditions, Health Behaviors, and Social Determinants of Health categories.

### **HP 2030 Objective: Nutrition and Healthy Eating**

Research continues to demonstrate the effectiveness of pharmacists' ability to improve care, including health outcomes, for patients with diet-related chronic conditions, such as diabetes and hypertension. For example, in one study, pharmacists achieved higher improvements in A1c, blood pressure, and statin goal attainment – 40% of patients in the pharmacist-led intervention group achieved all three clinical goals after intervention, compared with only 12% of patients in the usual care group<sup>7</sup>. More recently, researchers have estimated that a pharmacist prescribing intervention for hypertension was associated with \$1.137 trillion in cost savings and could save as many as 30 million life years over 30 years.<sup>8</sup> In addition, pharmacies are engaging in support of the momentum around the Food is Medicine movement as an important part of the strategy to promote prevention, management, and treatment of chronic diseases impacted by nutrition. Notably, a December 2022 poll showed that 80% of American adults support pharmacists' role in working with patients on nutritional issues to prevent diet-related, chronic disease such as heart disease and diabetes. Importantly, in September 2023, NACDS unveiled a new campaign called "[Nourish My Health](#)" as part of a commitment to the [2022 White House Conference on Hunger, Nutrition, and Health](#). "Nourish My Health" is a collaboration between NACDS and a robust group of national partners aimed at helping Americans embrace the protective health benefits that nutritious food provides in reducing the risk of diet-related conditions, including heart disease, diabetes, and many types of cancer. Poor nutrition is the number one cause of poor health outcomes in the United States, with billions of dollars spent annually on preventable, diet-related diseases. "Nourish My Health" seeks to reach millions of Americans, including those who live in rural areas and/or communities that are underserved, focusing on regions with disproportionate risk of diet-related diseases. The campaign is amplifying the importance of preventive screenings and raising awareness of the power of nutritious food as a part of lifestyle changes to improve health outcomes. Most notably, the goals of this campaign are directly aligned with those of the Healthy People 2030 subcategory of Nutrition and Healthy Eating.

### **HP 2030 Objective: Health IT – Pharmacy Data Interoperability**

Increasingly, pharmacies are providing a wider range of clinical services to help meet the health and wellness needs of the people and communities they serve. As patients access more services from pharmacies, pharmacy data interoperability becomes more important to the health care system at-large. Pharmacy teams' ability to provide optimal care and meaningfully contribute to public health objectives depends on their ability to access and contribute to patients' clinical records. Similarly, hospitals, clinics, labs, and other providers need to know the

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<sup>5</sup> Grabenstein JD. Essential services: Quantifying the contributions of America's pharmacists in COVID-19 clinical interventions. *J Am Pharm Assoc* (2003). 2022 Nov-Dec;62(6):1929-1945.e1. doi: 10.1016/j.japh.2022.08.010.

<sup>6</sup> <https://www.gao.gov/assets/gao-22-105079.pdf>

<sup>7</sup> Prudencio J, Cutler T, Roberts S, Marin S, Wilson M. (May 2018). The Effect of Clinical Pharmacist-Led Comprehensive Medication Management on Chronic Disease State Goal Attainment in a Patient-Centered Medical Home. *JMCP*. 2018;24(5):423-429.

<sup>8</sup> Dixon DL, Johnston K, Patterson J, Marra CA, Tsuyuki RT. Cost-Effectiveness of Pharmacist Prescribing for Managing Hypertension in the United States. *JAMA Netw Open*. 2023;6(11).

information stored in pharmacies' systems if they are to appropriately serve their patients. A [white paper](#) released by Leavitt Partners in April 2023 outlines the steps federal and state policymakers, technology and electronic health record (EHR) companies, health plans, pharmacies, and other health care providers can take to strengthen pharmacy data interoperability in furtherance of goals to streamline health IT systems and make it easier to electronically exchange health information. Additionally, the Office of the National Coordinator for Health IT's (ONC's) [Pharmacy Interoperability and Emerging Therapeutics Task Force](#) is a prime example of one meaningful step toward identifying the types of data exchanges between pharmacies and other constituents that could support improvements in medication management, patient safety, and consumer engagement. NACDS members have continued to engage with this taskforce, further demonstrating pharmacies' commitment to enhanced data sharing in support of bettering the health of the nation.

Pharmacies remain committed to meaningfully improving the health and wellness of the nation, in alignment with Healthy People Objectives. NACDS appreciates the opportunity to comment on the important work being done by the Office of Disease Prevention and Health Promotion through the Healthy People 2030 initiative. For questions or further discussion, please contact NACDS' Sara Roszak, Senior Vice President, Health and Wellness Strategy and Policy, at [sroszak@nacds.org](mailto:sroszak@nacds.org).

Sincerely,



Steven C. Anderson, FASAE, CAE, IOM  
President and Chief Executive Officer  
National Association of Chain Drug Stores

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NACDS represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate over 40,000 pharmacies, and NACDS' member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 155,000 pharmacists. They fill over 3 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and healthcare affordability. NACDS members also include more than 900 supplier partners and over 70 international members representing 21 countries. Please visit [NACDS.org](http://NACDS.org).