



November 7, 2021

U.S. Department of Health and Human Services
Office of the Assistant Secretary for Planning and Evaluation, Strategic Planning Team
Attn: Strategic Plan Comments
200 Independence Avenue, SW, Room 434E
Washington, DC 20201

To Whom It May Concern:

On behalf of the Diabetes Advocacy Alliance (DAA), I am pleased to submit comments related to **Objective 2.3 of the HHS Strategic Plan**. These comments also were included in the body of our cover email message.

The DAA is diverse in scope, with its 28 members representing patient, professional and trade associations, other non-profit organizations, and corporations, all united in the desire to change the way diabetes is viewed and treated in America. Since 2010, the DAA has worked with legislators and policymakers to increase awareness of, and action on, the diabetes epidemic. The organizations that comprise the DAA share a common goal of elevating diabetes on the national agenda so we may ultimately defeat this treatable, but also potentially devastating chronic disease. We are committed to advancing policies and legislation that can improve the health and well-being of people with diabetes and prediabetes, and to combatting health disparities and addressing social determinants of health. We do this by informing policymakers about strategies to prevent, detect and control diabetes and care for those affected by it. We also educate about how to address the drivers of health inequities, and the health equity implications of existing or new policies, regulations, and legislation.

Strategic Goal 2: Safeguard and Improve National and Global Health Conditions and Outcomes
[Strategic Objective 2.3: Enhance promotion of healthy behaviors to reduce occurrence and disparities in preventable injury, illness, and death](#)

The DAA applauds Secretary Becerra and the Office of the Assistant Secretary for Planning and Evaluation, Strategic Planning Team for the effort put into developing this comprehensive strategic plan. On a much smaller scale, the DAA has prepared a strategic plan to guide its advocacy efforts to advance policies and legislation that help prevent, diagnose, and treat diabetes, and provide ongoing care for the people directly and indirectly affected by this serious chronic disease. **We have selected HHS Objective 2.3 as aligned well with much of our strategic plan.**

As the HHS Strategic Plan is rolled out and used by various HHS agencies, including the Centers for Medicare and Medicaid Services (CMS) and Centers for Disease Control and Prevention (CDC), we

encourage the Strategic Planning Team to place DAA priorities for diabetes and obesity front and center, as ways to help achieve Objective 2.3. We know that HHS is aware of the enormous number of people affected by diabetes and obesity and the monumental economic and psychological costs associated with these chronic diseases.

The DAA also urges the Strategic Planning Team to carefully examine the final report of the National Clinical Care Commission (NCCC) as a blueprint for actions that need to be taken to help stem the tide of the diabetes and obesity epidemics – actions that would help HHS achieve Objective 2.3 and potentially other of your objectives.

The DAA presents its strategic priorities in three categories: Prevention, Detection, and Treatment/Care. While HHS agencies pursue their work in support of Objective 2.3, here are the priorities that will guide the work of the DAA to also help achieve Objective 2.3.

Prevention

Ensure equitable access to evidence-based diabetes prevention programs in all modalities (in-person, asynchronous, and synchronous/video)

- Support ongoing funding of the CDC's National Diabetes Prevention Program (National DPP)
- Address barriers to the success of CMMI's Medicare Diabetes Prevention Program (MDPP) expanded model test
- Address Social Determinants of Health
- Advocate for coverage of Medical Nutrition Therapy (MNT) for people with prediabetes and obesity
- Educate about access to the full continuum of care to treat obesity as another tool to address diabetes prevention

Detection

Expand screening access and coverage

- Ensure equitable access to screening, detection, and diagnosis
- Advocate for CMS coverage of the HbA1c test for screening and diagnosis of prediabetes and diabetes
- Advocate for screening/referral quality measures
- Monitor USPSTF recommendations for diabetes screening

Treatment/Care

Achieve optimal health outcomes for people with diabetes

- Ensure equitable access to Diabetes Self-Management Training (DSMT) and Medical Nutrition Therapy
- Advocate for improvements to DSMT coverage in Medicare
- Address Social Determinants of Health
- Support ongoing funding for the Special Diabetes Program and the Special Diabetes Program for Indians

- Educate about the importance of vaccinations
- Improve coordination of federal diabetes resources and initiatives

Expand access to digital health

- Extend and expand CMS COVID-19 waivers
- Advocate for equitable access to connected care

Educate about the intersection of obesity with diabetes treatment and care

- Advocate for the full continuum of care to treat obesity, to reduce new cases of type 2 diabetes and to help Medicare beneficiaries manage type 2 diabetes

Improve access to providers and care/insurance design

- Advocate for high quality and affordable insurance, with reduced out-of-pocket costs (private payer and Medicare)
- Educate about IRS guidance on preventive care

Conclusion

The DAA has always appreciated its interactions with officials of HHS agencies, whom we have found to be willing to listen to our concerns and ideas about what needs to be done to improve health outcomes for and the well-being of all people with diabetes and those at risk for type 2 diabetes. While the DAA will continue to advocate for improvements to policies related to the National DPP, the MDPP, DSMT, and MNT that we believe are still urgently needed, we appreciate that HHS shares our overall objectives. We thank you for this opportunity to provide comments and please know that we are available for any questions or input in our areas of expertise.

Sincerely,



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