The National Alliance to Impact the Social Determinants of Health

AN ALLIANCE CONVENED BY LEAVITT PARTNERS

February 27, 2019

Eric D. Hargan
Deputy Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Deputy Secretary Hargan,

Thank you for meeting with members of the National Alliance to impact Social Determinants of Health (NASDOH) to discuss federal statutory and regulatory barriers to implementing a value-based framework that sustains social determinants of health efforts and that addresses care for the whole person. We appreciate your work as part of the "Regulatory Sprint to Coordinated Care" and agree that removing unnecessary obstacles to care coordination can help accelerate the transformation to a value-based system, consistent with Secretary Azar's foundational remarks to the Hatch Center in November of 2018.

During our conversation regarding Medicare and Medicaid services that address social determinants of health issues, Surgeon General Adams encouraged NASDOH members to provide evidence for specific social determinants of health interventions that may deliver consistent return on investment (ROI). In follow-up to this discussion, NASDOH provides the following information:

Social Interventions Research and Evaluation Network (SIREN)

NASDOH is pleased to collaborate with SIREN on its mission "to catalyze and disseminate high quality research that advances efforts to identify and address social risks in health care settings." SIREN maintains an "Evidence Library" of research articles, reports, and issue briefs that evaluate health carebased interventions that address patients' social and economic needs. The database is searchable by intervention and outcomes. Additionally, SIREN provides guides and toolkits for implementing social needs screening and interventions in clinical settings. More information can be found at: https://sirenetwork.ucsf.edu/.

In addition to resources you may find at the SIREN website, we are familiar with two manuscripts that are systematic reviews of the impact of social determinants of health interventions in the health care setting:

1. American Journal of Preventative Medicine, "A Systematic Review of Interventions of Patients' Social and Economic Needs," by Laura M. Gottlieb, MD, MPH, Holly Wing, MA and Nancy E. Adler, PhD.; and

2. PLOS One, "Leveraging the Social Determinants of Health: What Works?" by Lauren A. Taylor, Annabel Xulin Tan, Caitlin E. Coyle, Chima Ndumele, Erika Rogan, Maureen Canavan, Leslie A. Curry and Elizabeth H. Bradley.

National Academy for Sciences, Engineering, and Medicine

The National Academies of Sciences, Engineering and Medicine (NAM) has been asked by the HHS Office of the Assistant Secretary for Health to conduct a workshop titled "Reducing Health Care Spending Through Interventions that Address Non-Medical Health-Related Social Needs." The one-day public workshop will "explore the potential impact of addressing non-medical health-related social needs on improving population health and reducing health care spending in a value-driven health care delivery system." Two members of NASDOH are part of the Workshop Planning Committee for the spring 2019 event.

In addition to the convening by NAM and the HHS Office of the Assistant Secretary of Health, an ad hoc committee of NAM is conducting a Consensus Study that will "examine the potential for integrating services addressing social needs and the social determinants of health into the delivery of health care to achieve better health outcomes and to address major challenges facing the U.S. health care system." NASDOH members are also participating in that Consensus Study Committee. More information on the study can be found at:

http://nationalacademies.org/hmd/activities/healthservices/integratingsocialneedscareintothedeliveryofhealthcaretoimprovethenationshealth.aspx.

Trust for America's Health

On February 21st, Trust for America's Health release a report titled "Promoting Health and Cost Control in States." This report "analyzes state action on 13 policies outside the healthcare sector that have a long-term impact on health and an evidence base showing their effectiveness." It can be found at https://www.tfah.org/report-details/promoting-health-and-cost-control-in-states/.

deBeaumont Foundation

The deBeaumont Foundation and Kaiser Permanente are working together on CityHealth an initiative that "provides [city] leaders with a package of evidence-based policy solutions that will help millions of people live longer, better lives in vibrant, prosperous communities" and rates the cities based on their progress in adopting the evidence-based policy package. More information regarding CityHealth can be found at http://www.cityhealth.org/about.

Centers for Disease Control and Prevention (CDC)

The CDC's Office of the Associate Director for Policy is also working on two initiatives:

- 1. 6/18 (www.cdc.gov/sixeighteen) "This initiative offers proven interventions that prevent chronic and infectious diseases by increasing their coverage, access, utilization and quality. Additionally, it aligns evidence-based preventive practices with emerging value-based payment and delivery models"; and
- 2. Health Impact in 5 Years (https://www.cdc.gov/policy/hst/hi5/index.html) "The Health Impact in 5 Years (HI-5) initiative highlights non-clinical, community-wide approaches that have evidence reporting 1) positive health impacts, 2) results within five years, and 3) cost effectiveness and/or cost savings over the lifetime of the population or earlier."

Thank you again for your time to discuss federal statutory and regulatory barriers to implementing and sustaining social determinants of health efforts. We await the release of the proposed regulations modernizing the Stark Law and antikickback policies and will review and comment on them with a social determinants of health lens. Additionally, NASDOH will be exploring with its members specific policy proposals for social determinants of health regulations and a proposed approach to keeping social determinants of health interventions in the medical loss ratio numerator.

Please let us know if we can provide you with additional information. NASDOH sees mutual interests between your work and ours and we look forward to serving as a resource on this important issue going forward.

Sincerely,

Vince Ventimiglia

Chairman, Leavitt Partners Board of Managers and Advisor to NASDOH