



The Honorable Xavier Becerra
Secretary of Health and Human Services
Department of Health and Human Services
200 Independence Ave SW
Washington, DC, 20201

Neera Tanden
Director, Domestic Policy Council
White House
1600 Pennsylvania Ave NW
Washington, DC 20500

Secretary Becerra and Ms. Tanden,

The National Alliance to Impact Social Determinants of Health (NASDOH) commends the Biden Administration and the Department of Health and Human Services (HHS) for issuing the first-ever Playbook to Address Social Determinants of Health¹ as well as the HHS Call to Action on Addressing Health-Related Social Needs in Communities Across the Nation² and a Medicaid and CHIP Health-Related Social Needs (HRSN) Framework.³ NASDOH has long advocated to make addressing SDOH a national priority, including in our 2020 recommendations to the Biden Administration.⁴ We appreciate the significant work of the Administration to advance health equity and address SDOH, including through the recent Playbook, call to action, and Medicaid framework. NASDOH looks forward to working with the Administration on implementing these important recommendations.

About NASDOH

Founded in 2018 by Governor Mike Leavitt and Dr. Karen DeSalvo, NASDOH is a group of stakeholders working to systematically and pragmatically build a common understanding of the importance of addressing social needs as part of an overall approach to health improvement. We seek to make a material improvement in the health of individuals and communities and, through multi-sector partnerships, advance holistic, value-based, person-centered health care that can successfully impact the social determinants of health. NASDOH brings together stakeholders from different geographic regions with health care expertise, public health and social services expertise, local community experience, community-convening competence, business and financial insight, health and wellness information technology expertise, data and analytics competencies, and policy and advocacy acumen to assess and address current regulatory frameworks, funding environments and opportunities, and practical challenges to implementing and sustaining social determinants of health efforts.

Support for Implementation of the SDOH Playbook and Call to Action

The HHS Call to Action specifically highlights the need for “organizations from different sectors operating within the same community” to “come together...with a shared vision and collaborate to improve care coordination” and that “everyone will need to work together to create a stronger, more integrated health and social care system that meets individuals where they are and improves equitable

¹ <https://www.whitehouse.gov/wp-content/uploads/2023/11/SDOH-Playbook-4.pdf>

² <https://aspe.hhs.gov/sites/default/files/documents/3e2f6140d0087435cc6832bf8cf32618/hhs-call-to-action-health-related-social-needs.pdf>

³ <https://www.medicaid.gov/sites/default/files/2023-11/hrsn-coverage-table.pdf>

⁴ <https://nasdoh.org/wp-content/uploads/2021/03/NASDOH-Recommendations-to-New-Biden-Admin-to-Address-SDOH.pdf>

opportunities for the highest level of health and well-being.”⁵ NASDOH strongly agrees with the need for multiple sectors to work together to improve health and social outcomes. As a multi-sector coalition focused on addressing SDOH, the Alliance and its members are eager to be a resource and support implementation of the Playbook and continue efforts to improve health care and social care in the local communities our members are located.

The SDOH Playbook and Call to Action specifically note the importance of the social services sector in addressing SDOH, as well as the challenges these organizations face in accessing funding. NASDOH appreciates the Administration’s recognition that health care funding is often “walled off” from addressing SDOH and supports the Administration’s priority to support funding for backbone organizations and more flexible funding. In 2020, NASDOH released a white paper on opportunities for pooling funding to support multi-sector approaches, which also discussed the importance of backbone organizations.⁶ Backbone organizations can serve many different roles and have unique structures, including having multiple organizations partner to form a backbone, to utilize a community’s assets and address needs. Flexible funding is critical for supporting this social care infrastructure to meet individual needs and address upstream drivers of health.

In May 2023, NASDOH released an issue brief outlining the progress made in the federal policy landscape to address social needs and SDOH over the last five years.⁷ This document not only highlights key policy changes and trends over the past five years to address SDOH, but also articulates a forward-looking vision for the evolving federal SDOH policy landscape in the years to come. NASDOH was pleased to see that many of the goals in our forward-looking vision would be advanced by the Playbook’s pillars and actions. For example, NASDOH’s goal that in the next five years “Robust networks and partnerships will seamlessly connect healthcare providers, social service organizations, and public agencies to enable effective and sustained support for individuals” would be advanced by Pillar 1: Expand Data Gathering and Sharing and specific actions to expand privacy guidance and continue agency encouragement of the use of systems for exchanging SDOH data. Quickly and robustly implementing the breadth of actions in the Playbook will advance a shared vision for improving health and wellbeing by addressing SDOH.

Additionally, the Alliance is pleased to see many of our prior recommendations to HHS and the Administration included in the SDOH Playbook, such as a focus on supporting backbone organizations and flexible funding,⁸ a focus on collecting and sharing SDOH data,⁹ Medicare coverage of HRSN services provided by community health workers,¹⁰ and additional guidance¹¹ on HRSN services that can be covered under Medicaid and CHIP. The specific actions identified by HHS are critical for supporting stakeholders in addressing SDOH, and NASDOH looks forward to working with the Administration on implementing these important recommendations.

⁵ <https://aspe.hhs.gov/sites/default/files/documents/3e2f6140d0087435cc6832bf8cf32618/hhs-call-to-action-health-related-social-needs.pdf>

⁶ https://nasdoh.org/wp-content/uploads/2020/12/Pooled-Funding-Brief_FINAL.pdf

⁷ nasdoh.org/wp-content/uploads/2023/05/NASDOH-Five-Year-Anniversary-Issue-Brief.pdf

⁸ https://nasdoh.org/wp-content/uploads/2020/12/Pooled-Funding-Brief_FINAL.pdf

⁹ https://nasdoh.org/wp-content/uploads/2020/08/NASDOH-Data-Interoperability_FINAL.pdf

¹⁰ <https://nasdoh.org/wp-content/uploads/2023/09/NASDOH-Comments-on-CMS-CY2024-PFS-Proposed-Rule-2.pdf>

¹¹ https://nasdoh.org/wp-content/uploads/2021/10/10-21-NASDOH-Medicaid-and-Social-Needs-Issue-Brief_FINAL.pdf

NASDOH was also pleased to see the opportunities for congressional action included in the Playbook. Congress is an important partner in this work, and NASDOH is ready to continue to work with legislative policymakers in a bipartisan manner to ensure every American can lead a healthy life.

NASDOH appreciates the Administration's prioritization of addressing SDOH, as well as the leadership in outlining future actions for improving Americans' health by addressing the social circumstances that impact health outcomes. The actions outlined in the SDOH Playbook are significant steps forward in advancing health equity. Continued leadership from senior officials at the White House, as well as the relevant departments and agencies will be necessary to make meaningful progress on the actions within the playbook, particularly the actions that require coordination between multiple departments, agencies, and programs. Please also consider NASDOH and our members to be a resource and partner for implementation of the Playbook and Call to Action.

For more information on NASDOH and our members, please visit our website at www.nasdoh.org or contact Sara Singleton at Sara.Singleton@leavittpartners.com

Sincerely,

Sara Singleton

Sara Singleton

Principal, Leavitt Partners and Advisor to NASDOH

cc: Chicquita Brooks, Administrator, Centers for Medicare & Medicaid Services
Miranda Lynch-Smith, Office of the Assistant Secretary for Planning and Evaluation, HHS