



ADVOCATES FOR
COMMUNITY
HEALTH

June 18, 2022

Assistant Secretary for Health ADM Rachel L. Levine, MD
Office of the Assistant Secretary for Health, Office of the Secretary
Department of Health and Human Services (HHS)
200 Independence Ave SW
Washington, DC 20201

RE: [RFI: 2022 HHS Environmental Justice Strategy, Department of Health and Human Services](#) located at [87 FR 20876](#)

Dear ADM Levine,

Advocates for Community Health (ACH) appreciates the opportunity to comment on the 2022 HHS Environmental Justice Strategy and Implementation Plan Draft Outline. ACH is a membership organization for federally qualified health centers (FQHCs) who are focused on visionary and innovative policy and advocacy initiatives to effect positive change across the nation's health care system.

Community health centers have been, and will continue to be, vital to achieving health equity in the United States. Over the past few decades, they have served historically marginalized communities and provided comprehensive, culturally competent, integrated care to millions of people. We keep health equity at the core of everything we do. At ACH, we recognize and address social determinants of health as part of our mission for equitable healthcare for all. A person's zip code is often more influential than their genetic code. At the root of health equity is achieving environmental justice for marginalized communities. Ultimately, we seek a nation where we no longer have disparities in health outcomes by race and ethnicity. Therefore, we thank HHS for prioritizing Partnerships and Community Engagement in the Implementation Plan.

ACH offers specific feedback on the following questions:

Environmental Justice Core Principles

What Environmental Justice Core Principles should be included in the HHS EJ Strategy to advance environmental justice for disadvantaged communities?

Currently, the Implementation Plan does not include specific Environmental Justice Core Principles. ACH recommends referencing the core 17 principles from the National People of Color Environmental Leadership Summit adopted in 1991¹ and supplementing the principles with language related to a health equity lens, climate change, and need for distributive justice and participatory justice². The core principles should specify all marginalized populations and consider ways for disability inclusion. The

¹ <http://www.ejnet.org/ej/principles.pdf>

² How The Principles Of Environmental Justice Can Improve Health Equity", Health Affairs Forefront, February 28, 2022. DOI: 10.1377/forefront.20220224.590765

governance model of Federally Qualified Health Centers, which require each center’s Board of Directors to be comprised of a majority of consumers of health center services, is a proven model of community-engaged decision making and we encourage HHS to incorporate its key elements.

Lastly, the core principles should indicate the environmental concerns to address, such as clean water supply, air pollution, environmental toxins, lead exposure, extreme heat, flooding, fires, and climate change. The American Medical Association recently announced climate change a public health crisis³, and the World Health Organization declared climate change to be “the single biggest health threat facing humanity” in 2021⁴. The CDC depicts climate change impacts to health in the picture below⁵:



Priority Actions

Do the Priority Actions capture the urgent, environmental justice issues of today? If not, what additional Priority Actions should be included within the HHS EJ Strategy?

ACH supports the partnerships and Community Engagement Strategic element and its Priority Actions. Additionally, we recommend that partnerships include representation from community members and FQHCs. Community health centers apply culturally tailored interventions. When working with stakeholders, we are deliberate in our messaging in an effort to communicate the urgency of our work through a solutions-oriented lens.

We also recommend that environmental justice becomes an interagency, collaborative effort within the federal government. Agencies should develop cross cutting task forces and policy goals, and that these task forces include the voices of community members and FQHCs. The September 2022 White House Conference on Food, Nutrition, and Health⁶ is a perfect platform to address the issue of inadequate access to healthy food. Cross-cutting federal effort also includes looking outside of HHS, such as connecting with U.S. Department of Agriculture (USDA) regarding ecosystem and One Health issues that relate to environmental justice. One Health is “an approach that recognizes that the health of people is closely connected to the health of animals and our shared environment.”⁷

³ <https://www.ama-assn.org/press-center/press-releases/ama-adopts-new-policy-declaring-climate-change-public-health-crisis>

⁴ World Health Organization. COP26 special report on climate change and health: the health argument for climate change. Geneva: World Health Organization, 2021

⁵ <https://www.cdc.gov/climateandhealth/effects/default.htm>

⁶ <https://health.gov/our-work/nutrition-physical-activity/white-house-conference-hunger-nutrition-and-health>

⁷ “One Health Basics,” Centers for Disease Control and Prevention, accessed May 12, 2022

Under education and training, we also recommend training the health workforce on environmental justice principles and health literacy. FQHCs often screen for social needs and address multiple, layering health conditions. For example, providers should understand the historical context of health disparities and how that relates to patient outcomes. For example, as a result of redlining practices, African Americans usually live in areas with greater air pollution, which exacerbates asthma symptoms⁸. Patients need to understand underlying causes and possible solutions to some of their health concerns.

Research and Data Tools

What research methods, research questions, and data tools should HHS use to address environmental justice and social determinants of health?

Social determinants of health include a person's built environment. Therefore, ACH recommends HHS to develop, test, and disseminate health equity measurement tools. We directly advocate for HHS to partner with FQHCs and other organizations that work directly in the community to pilot such measures. At the heart of health equity is environmental justice.

Research questions come from the community. Therefore, a cross-cutting feature of the plan begins with partnership with the people. Many towns use community health assessments as a starting point in order to understand the current landscape and tailor specific research questions to the needs of the community. Therefore, not only should HHS provide data to communities, HHS should encourage and support the use local data, both qualitative and quantitative, and measure community engagement to show impact to the people.

Additionally, we recommend HHS continue to fund evidence-based frameworks. CDC has funded communities to use a five step Building Resilience Against Climate Effects (BRACE) framework to identify likely climate effects in their area, identify those most at risk for related health concerns, and create a plan to address those needs⁹.

Once again, we thank HHS for making environmental justice part of its mission, and ACH supports efforts to remove inequities for people of color, disadvantaged, vulnerable, low-income, marginalized, and indigenous populations.

For more information, please feel free to contact me at apearskelly@advocatesforcommunityhealth.org.

Sincerely,



Amanda Kelly
Chief Executive Officer
Advocates for Community Health

⁸ Nardone A, Casey JA, Morello-Frosch R, Mujahid M, Balmes JR, Thakur N. Associations between historical residential redlining and current age-adjusted rates of emergency department visits due to asthma across eight cities in California: an ecological study. *Lancet Planet Health*. 2020;4(1):e24-e31.

⁹<https://www.cdc.gov/climateandhealth/BRACE.htm>