



October 27, 2017

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 415F,
Washington, DC 20201

SUBJECT: Comments on DHHS Strategic Plan

To Whom it May Concern:

The National Organization of State Offices of Rural Health (NOSORH) is the membership association of the fifty State Offices of Rural Health. Our mission is to work with the State Offices of Rural Health to improve health in rural America. State Offices of Rural Health are anchors of information for information for a wide variety of DHHS programs. They are neutral observers and conveners for rural health. They are responsible for collaboration, information dissemination and technical assistance on many DHHS programs which address the needs of rural communities and health care providers across the nation including critical access hospitals, certified rural health clinics, oral health and other providers.

NOSORH submits these comments to support the DHHS strategies to meet the needs of rural Americans. Thank you for the opportunity to comment. If we can provide additional information on the impact of proposed regulations for rural and underserved communities and the providers who serve them please feel free to email teryle@nosorh.org or call for assistance.

Sincerely,

Teryl E. Eisinger, MA
Executive Director
National Organization of State Offices of Rural Health

Possible Rural-Specific Strategies for Inclusion in the Department of Health and Human Services (DHHS) Strategic Plan

The National Organization of State Offices of Rural Health suggests that several rural focused strategies be included in the draft DHHS Strategic Plan. All but one of the suggested strategies could be included under:

Strategic Goal 1: Reform, Strengthen, and Modernize the Nation's Health Care System.

The last suggestion could be included under:

Strategic Goal 3: Strengthen the Economic and Social Well-Being of Americans Across the Lifespan.

Suggested strategies are listed below under the appropriate Plan Objective:

Objective 1.1: Promote affordable health care, while balancing spending on premiums, deductibles, and out-of-pocket costs.

- **Improve Health Service Reimbursement Mechanisms:** Develop and implement appropriate reimbursement mechanisms for rural health services. These mechanisms, including appropriate pay for performance systems, will be designed to:
 - Sustain needed health services in rural and frontier areas,
 - Provide incentives for improved health and clinical outcomes, and
 - Promote cost-effective service provision.

Objective 1.2: Expand safe, high-quality healthcare options, and encourage innovation and competition.

- **Improve Local Service Coordination:** Implement local service system development efforts that will improve coordination between services in rural and frontier communities. Improvements will include expanded referral systems, service integration efforts as well as the development of multi-provider care coordinating services.
- **Improve Rural Health Service Performance:** Implement rural/frontier health service improvement efforts, including quality improvement efforts.
- **Improve Regional Care Networks:** Implement programs to develop appropriate networks of services in rural/frontier areas and between rural/frontier areas and upstream urban areas. These networks will be designed to:
 - Increase service efficiency,
 - Improve service quality,
 - Improve service outcomes, and
 - Improve patient health.
- **Improve Electronic Data Systems in Rural Areas:** Implement programs to develop and sustain the use of electronic health data systems, including electronic

health records, by rural and frontier health service providers. These efforts will include the support of health data sharing between providers and between providers and patients.

Objective 1.3: Improve Americans’ access to health care and expand choices of care and service options.

- **Sustain Essential Rural Health Services**: Develop and sustain essential services in rural and frontier areas. These services should include:
 - Hospital services,
 - Primary care services,
 - Essential specialty services,
 - Emergency Medical services,
 - Chronic care management services,
 - Public health services,
 - Behavioral health services, and
 - Oral health services.

- **Improve Telehealth Services**: Implement programs to develop and sustain appropriate telehealth services for rural and frontier communities.

Objective 1.4: Strengthen and expand the healthcare workforce to meet 397 America’s diverse needs.

- NOSORH is broadly supportive of the strategies described in the section of this objective designed to “*Reduce provider shortages in underserved and rural communities.*” The inclusion of language recognizing the needs of both “rural and underserved areas” is useful in establishing appropriate direction for this Objective.

- NOSORH notes that the subsequent strategies described in the section designed to “*Support professional development of the healthcare workforce*” is particularly important in rural and underserved areas. NOSORH suggests that similar language targeting rural and underserved areas be added to the strategies described in this section.

Objective 3.4: Maximize the independence, well-being, and health of older adults, people with disabilities, and their families and caregivers.

- NOSORH believes that it is important to develop approaches that permit older adults in rural communities to age in place in those communities. Displacement to urban centers would remove these elders from sources of community and family support. NOSORH suggests that specific language emphasizing the special challenges of rural communities be added to the section designed to “*Strengthen supports for community living.*”