



May 19, 2022

Admiral Rachel L. Levine, MD
Assistant Secretary for Health
U.S. Department of Health & Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

RE: Request for Information (RFI): 2022 HHS Environmental Justice Strategy and Implementation Plan Draft Outline

Dear Admiral Levine,

The American Academy of Nursing (Academy) appreciates the opportunity to offer comments regarding the Department of Health and Human Services' (HHS) 2022 Environmental Justice Strategy and Implementation Plan Outline. We applaud the Biden Administration for committing to make environmental justice part of its priorities. The Academy serves the public by advancing health policy through the generation, synthesis, and dissemination of nursing knowledge. Academy Fellows are inducted into the organization for their extraordinary contributions to improving health locally and globally. With more than 2,900 Fellows, the Academy represents nursing's most accomplished leaders in policy, research, administration, practice, and academia.

The vision of the Academy is *Healthy Lives for All People*. To actualize this vision, the Academy's mission is to improve health and achieve health equity by influencing policy through nursing leadership, innovation, and science. The proposed draft strategy and implementation plan from the Department of Health and Human Services (HHS) will serve as a blueprint to confront environmental and health inequities where communities disproportionately impacted by environmental burdens live, work, and play. Overall, the Academy commends the direction of the draft plan outline draft and find it to be reflective of the relevant areas of environmental justice. The Academy does recommend the HHS consider adding prevention strategies and activities to the priority actions outlined in the strategic elements. Please note our comments are reflective of strategic elements one through five.

Strategic Element One – Services

The Academy is pleased HHS is committed to expanding funding opportunities to those disadvantaged communities for economic development and social services. As these services and funding opportunities are developed, we recommend further clarification on how HHS will identify selected communities. Interdepartmental coordination will be key to avoid duplication and ensure governmental tools, services, programs amplify the funding's impact. For example, the Environmental Protection Agency's EJScreen¹ has been an effective environmental justice screening and mapping tool that could prove useful as HHS develops criteria.

As HHS builds up this funding opportunity, we recommend the Department consider if this action will build and strengthen community capacity. In order to ensure greater capacity, the HHS will need to actively engage with the community and stakeholders in the development of this funding opportunity. Every community is different and by seeking input from the communities, HHS will be better able to direct what is best needed for each individual community.

Strategic Element Two – Partnerships and Community Engagement (Public Engagement)

Currently, the draft plan does not outline a stakeholder definition for the Environmental Justice Strategy. The Academy encourages HHS to establish criteria for these stakeholders and additionally recommend that nurses be included. Public health nurses in particular, improve the health of vulnerable populations as well as entire communities and many focus on population health specifically.² These skilled and specialized nursing professionals will be able to offer great insight as HHS works to engage communities to bring forth environmental justice.

The draft plan specifically addresses language barriers when discussing community engagement. Considering multiple barriers will be critical as communities vary greatly. In particular, the Academy recommends HHS consider the historic issues of environmental racism that have prevented the ability to build trust with federal programs as the plan is drafted.

Access to technology remains a challenge in the U.S. and disparities in access to broadband continue to persist. A Pew Research Center report found that a growing number of Americans are using their smartphone as their primary device to access the internet, with the largest groups being non-white with lower education and income levels.³ Additionally, the Pew report found that 15% of Americans own a smartphone but say that they have a limited number of ways to get online other than their cell phone.⁴ This could be problematic in rural and underserved areas where high-speed internet is limited in the communities the draft plan is expected to help. Digital inclusion will be critical to ensure health equity⁵ as well as environmental justice is realized in these communities.

Strategic Element Three – Policy Development and Implementation

The Academy urges HHS to work with stakeholders from within the community in order to ensure the assistance provided is based on what the community truly needs. We applaud the Administration's commitment to Justice40 initiative, which ensure that at least 40 percent of the overall benefits from federal investments in climate change and clean energy are distributed to disadvantaged communities.⁶ As the Academy indicated in our comments above, it is vital that criteria be developed through initiatives such as the EJScreen or other programs to accurately identify the disadvantaged communities that would benefit from the Justice40 initiative. Additionally, HHS should consider other examples of evidence-based policies that reduce the effects of climate change that could benefit these communities. One example could be nature-based solutions such as "tree canopies" that reduce global warming in urban communities by replacing concrete with more trees.⁷ Another example would be implementing policies that allow nurses to practice to the full extent of their licensure. Doing so would allow nurses to prescribe air conditioning units for asthma patients who live in homes without it. This type of policy would lead to better health outcomes for the patient and lower health care costs.⁸

The Academy commends HHS for including workforce development programs in the draft plan outline. Further guidance on how these efforts would connect with and compliment current federally funded programs would be important to accelerate the growth of the workforce for the challenges ahead. Bolstering the nursing workforce, in particular, is vital as the profession plays a key role in reducing and responding to the health consequences of climate change. Moreover, nurses are trusted messengers of health information and serve as essential personnel during responses to natural disasters.⁹ Nurses will be key to the successful development and implementation of the priority actions outlined in strategic element three.

Strategic Element Four – Research and Data Collection, Analysis, Utilization

The Academy commends HHS for prioritizing support of research that explores the multiple and compelling factors contributing to health disparities including environmental factors. Again, interdepartmental and cross-agency coordination to reduce duplication will be important in accelerating

research capacity. The Academy encourages HHS to ensure that there is coordination with the National Institute for Nursing Research and other nurse scientists working in this field of research as the plan is developed.

As the Department prioritizes research and data, the Academy encourages HHS to consider that the adoption of all policies impact overall health and well-being. While this draft plan is focused on strategies and policies aimed at health inequities and environmental injustices after the fact, the Academy recommends HHS consider how prevention activities could impact health and well-being as well.

Strategic Element Five – Education and Training

The Academy applauds the prioritization of training programs to target environmental justice. Within the third priority action identified, under this strategic element, the Academy urges HHS to focus on the prevention of environmental and health risks to communities. HHS can simultaneously develop guidance and templates on these risks; however, prevention strategies should be prioritized in the draft plan as well.

The Academy thanks HHS for the opportunity to provide comments on the 2022 Environmental Justice Strategy and Implementation Plan Draft Outline. If we can be of any assistance to you or your staff, offer the expertise of nurses working in the field of environmental health, please do not hesitate to contact the Academy's Senior Director of Policy, Christine Murphy, at cmurphy@aannet.org or 202-777-1174.

Sincerely,



Kenneth R. White, PhD, AGACNP, ACHPN, FACHE, FAAN
President
American Academy of Nursing

¹ *EJScreen: Environmental Justice Screening and Mapping Tool*. (n.d.). US EPA. <https://www.epa.gov/ejscreen>

² Kub, J. E., Kulbok, P. A., Miner, S., & Merrill, J. A. (2017). Increasing the capacity of public health nursing to strengthen the public health infrastructure and to promote and protect the health of communities and populations. *Nursing Outlook*, 65(5), 661–664. <https://doi.org/10.1016/j.outlook.2017.08.009>

³ Pew Research Center. (2015). *U.S. Smartphone Use in 2015*. Retrieved from <https://www.pewresearch.org/internet/2015/04/01/us-smartphone-use-in-2015/>

⁴ Pew Research Center, 2015

⁵ Rodriguez, J. A., Shachar, C., & Bates, D. W. (2022). Digital Inclusion as Health Care — Supporting Health Care Equity with Digital-Infrastructure Initiatives. *New England Journal of Medicine*, 386(12), 1101–1103. <https://doi.org/10.1056/nejmp2115646>

⁶ House, T. W. (2021, January 27). *FACT SHEET: President Biden Takes Executive Actions to Tackle the Climate Crisis at Home and Abroad, Create Jobs, and Restore Scientific Integrity Across Federal Government*. The White House. <https://www.whitehouse.gov/briefing-room/statements-releases/2021/01/27/fact-sheet-president-biden-takes-executive-actions-to-tackle-the-climate-crisis-at-home-and-abroad-create-jobs-and-restore-scientific-integrity-across-federal-government/>

⁷ Canopy. (2018, May 17). *The Benefits of Trees*. <https://canopy.org/tree-info/benefits-of-trees/>

⁸ Mason, D. J. (2015). Getting what we pay for. *Nursing Outlook*, 63(3), 236–237. <https://doi.org/10.1016/j.outlook.2015.03.005>

⁹ Leffers, J., & Butterfield, P. (2018). Nurses play essential roles in reducing health problems due to climate change. *Nursing Outlook*, 66(2), 210–213. <https://doi.org/10.1016/j.outlook.2018.02.008>