



November 12, 2015

Office of Disease Prevention and Health Promotion,
U.S. Department of Health and Human Services
1101 Wootton Parkway, Suite LL100
Rockville, MD 20852

Re: Written Comments on a Proposed New Healthy People 2020 Objective for Diabetes Screening

Dear Dr. Wright:

The Diabetes Advocacy Alliance (DAA) appreciates the opportunity to comment on modifications to the Healthy People 2020 objectives. The DAA is a coalition of member organizations, representing patient, professional and trade associations, other non-profit organizations, and corporations, all united in the desire to change the way diabetes is viewed and treated in America.

The members of the DAA have long supported the Healthy People 2020 initiative. We believe Healthy People 2020 is an important framework to set national public health objectives and ultimately promote health and prevent disease. The DAA and the United States Department of Health and Human Services (HHS), Office of Disease Prevention and Health Promotion (ODPHP) have had a strategic partnership since 2012 to promote diabetes prevention and treatment goals that are part of Healthy People 2020. Specifically, the partnership focuses on a range of collaborative educational and communication efforts aimed at helping to achieve the diabetes objectives.

Diabetes is one of the biggest public health problems our country faces today. More than 29 million Americans currently have diabetes and another 86 million are at high risk for developing diabetes. Diabetes is a gateway disease, and can often result in serious health complications, including heart disease, stroke, blindness, amputation, and kidney failure, as well as increased risk for other conditions. The prevalence and severity of diabetes necessitate heightened prevention efforts.

Screening is a critical first step to preventing diabetes and its complications. The United States Preventive Services Task Force (USPSTF) recently released its final recommendation for screening for abnormal blood glucose and type 2 diabetes mellitus in adults who are at increased risk for diabetes. This recommendation updates the 2008 diabetes screening guideline, which recommended screening only asymptomatic adults with hypertension. The new draft guideline recommends screening for abnormal blood glucose as part of a cardiovascular risk assessment in adults aged 40 to 70 years who are overweight or obese. In addition, the USPSTF guideline recommends that clinicians offer or refer patients with abnormal blood glucose to intensive behavioral counseling interventions to promote a healthful diet and physical activity, which

directly aligns with HP 2020 Diabetes Objective 16-Increase prevention behaviors in persons at high risk for diabetes with prediabetes.

The DAA recognizes the USPSTF final guideline as an improvement over the 2008 guideline, which if widely adopted by health care providers could help identify adults with abnormal blood glucose, including both:

- Asymptomatic adults with undiagnosed diabetes – a population estimated by the CDC at 8.1 million – who could begin treatment to prevent or delay complications; and
- Asymptomatic adults with abnormal blood glucose that is not in the range for diabetes, who could benefit from evidence-based diabetes prevention programs, such as those recognized by the CDC’s National Diabetes Recognition Program (which is a component of the National Diabetes Prevention Program).

Based on the recent release of the USPSTF final screening recommendation, the DAA proposes the addition of a new objective to align with the new diabetes screening recommendation and to further promote the goals of Healthy People 2020. In particular, we ask that HHS consider adding the following as a new objective:

- **Increase the number of asymptomatic adults screened for abnormal blood glucose and type 2 diabetes mellitus.**

This proposed objective meets all criteria necessary to be included as a Healthy People 2020 objective. The goal of increased population screening for diabetes supports the broader Healthy People 2020 goals and also supports many of the existing diabetes objectives, including D-1, D-15, and D-16. This proposed objective is supported by strong clinical evidence, as the USPSTF rigorously reviewed existing peer-reviewed evidence to develop the final diabetes screening guideline.

The DAA looks forward to continuing its partnership with ODPHP to help achieve the Healthy People 2020 diabetes objectives and to reduce the burden of diabetes. We believe the inclusion of our newly proposed objective would further support these efforts, and we applaud ODPHP’s commitment to improving the quality of our nation’s health.

Sincerely,

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