

June 13, 2022

Submitted via email to OIDP@hhs.gov.

RE: STI Federal Implementation Plan

Dear colleagues,

Thank you for this opportunity to provide feedback on behalf of Howard Brown Health. Howard Brown was founded in 1974 and is now one of the nation's largest lesbian, gay, bisexual, transgender, and queer (LGBTQ+) organizations. Rooted in LGBTQ+ liberation, Howard Brown provides affirming healthcare and mobilizes for social justice. We envision a future where healthcare and transformative social policies actualize human rights and equity for all. We serve more than 40,000 adults and youth annually. Our diverse health and social service delivery system is focused around seven major programmatic divisions: primary medical care, behavioral health, research, HIV/STI prevention, youth services, elder services, and community initiatives.

Recent data from the CDC shows that rates of STIs have increased dramatically in recent years, especially among some racial/ethnic minority groups, gay and bisexual men, and youth.¹ In response, the federal government created parallel HIV, viral hepatitis, and STI Strategic Plans, recognizing the importance of taking a comprehensive, syndemic approach to addressing this growing public health concern. While the STI Strategic Plan outlined a robust, collaborative all-of-government response, that unfortunately has not been carried through to the draft STI Federal Implementation Plan. Because of this, we recommend that the draft implementation plan be withdrawn and developed further prior to finalization. We do not make this recommendation lightly or without appreciation for the challenges it presents. Ultimately, we hope that these comments will contribute to a stronger and more robust implementation plan.

We are especially concerned that the implementation plan is vague, with many strategies lacking a comprehensive list of action steps. For example, Strategy 4.1.5: "Re-examine laws that criminalize behavior that potentially exposes another person to an STI" has no action steps tied to it. Several other strategies similarly lack comprehensive action steps. For strategies that do have action steps, often these steps are quite vague and lack measures. For example:

- IHS will "Enhance syphilis and congenital syphilis screening." (first instance on p. 15) This step is vague, without any indication of how they plan to do enact it.

¹ <https://www.cdc.gov/media/releases/2022/p0412-STD-Increase.html>

- The only action step listed under *Strategy 1.2.5* (“Establish partnerships with both public and private entities to expand and strengthen STI prevention efforts”), is that CDC will “Create a community of practice among clinical, public health, community organization staff, and STD Training centers to address data, provider education and community education needs.” (p. 10) This action step is incredibly broad, without clear benchmarks for progress.
- “Support education of providers, trusted messengers, school systems, and local governments about evidence-based interventions, including reminder-recall, provider prompts, announcement approach to parents, and bundling vaccines.” (p. 11)

These action steps are the most important part of the implementation plan, and as such, they should be as specific as possible. Each step should be accompanied by a set of measures so that the implementation working group is able to track progress for each strategy and hold federal partners accountable. Ideally, the action steps should also include details about funding mechanisms, like the Hepatitis Federal Implementation Plan. Including funding mechanism information will ensure that the strategies and action steps are actually feasible and that the federal government is able to adequately support nonfederal partners.

For a more complete list of concerns that we share, please review the letter sent by our colleagues at the National Coalition of STD Directors.

Thank you for the opportunity to provide feedback. If you have any questions, please feel free to reach out to Tim Wang, Director of Policy and Advocacy, at timothyw@howardbrown.org.

Sincerely,

David Ernesto Munar
President and CEO