

October 31, 2024

[Submitted electronically to HP2030@hhs.gov]

Paul Reed, Deputy Assistant Secretary for Health
U.S. Department of Health and Human Services
Office of Disease Prevention and Health Promotion
1101 Wootton Parkway, Suite 420
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RE: Announcement of Solicitation of Written Comments on Proposed Healthy People 2030 Objectives

Greetings Assistant Secretary Reed,

The American Association of Colleges of Pharmacy ([AACP](#)) and the American Pharmacists Association ([APhA](#)) appreciate the opportunity to comment on the new objectives proposed by the Association for Prevention Teaching and Research (APTR) Healthy People Curriculum Task Force (Task Force) for Healthy People 2030. AACP and APhA support objective #5: *ECBP-NEW-05* which would increase the proportion of colleges and schools of pharmacy with Doctor of Pharmacy (PharmD) degree programs that include environmental health content in a required learning experience.

Incorporating environmental health content into the PharmD curriculum will be supportive in addressing medication waste and disposal, sustainable pharmacy practices, and other public health initiatives. AACP and APhA believe the pharmacy profession has demonstrated its unique position to serve as public health leaders who can have a lasting impact on population health, directly contributing to the health of our communities by 2030.

AACP is the national organization representing pharmacy education in the United States. The mission of AACP is to lead and partner with our members in advancing pharmacy education, research, scholarship, practice and service to improve societal health. Our members are the 143 colleges and schools of pharmacy in the United States and over 4500 faculty and staff members, students and administrators at these schools.

APhA is the largest association of pharmacists in the United States advancing the entire pharmacy profession. APhA represents pharmacists in all practice settings, including but not limited to community pharmacies, hospitals, long-term care facilities, specialty pharmacies, community health centers, physician offices, ambulatory clinics, managed care organizations,

hospice settings, and government facilities. Our members strive to improve medication use, advance patient care, and enhance public health.

AACP is a member of the Task Force and helped to collect baseline data in early 2022 to convert the prior developmental objectives to core objectives.¹ There will be mid-decade data collected in 2025. The 2022-2023 AACP Argus Commission was charged with guiding schools, curriculum committees, and faculty on incorporating health, wellness, and health inequities stemming from climate change into pharmacy curricula.² The Argus Commission provided recommendations and suggestions to colleges and schools of pharmacy, including ensuring all graduates are aware of the potential impact of climate change on health and how healthcare delivery contributes to climate change. Student pharmacists should also have opportunities to work with diverse partners to help minimize the impact of healthcare delivery and industries in the pharmaceutical supply chain contributing to climate change.

With respect to the training of student pharmacists and the next generation of pharmacists, the Accreditation Council for Pharmacy Education ([ACPE](#)) 2025 standards include that a graduate can optimize patient healthcare outcomes using human, financial, technological, and physical resources to improve the safety, efficacy, and environmental impact of medication use systems.

³ This element of the standards further supports new objective #5: *ECBP-NEW-05*.

APhA has been a supporter of Healthy People initiatives over the past few decades. As the Healthy People framework delineates public health objectives intended to promote health, prevent disease, and protect against public health threats, APhA and its members align closely with the framework. APhA believes that pharmacists are well positioned, as one of the most accessible health care professionals, to easily disseminate patient education materials promoting healthy practices. The goals and objectives of Healthy People 2030 naturally align with pharmacists' existing commitment to their patients – especially the most vulnerable and underserved patients. In particular:

- APhA actively promotes and supports the pharmacist's role in helping patients to prevent development of substance abuse disorder and drug overdoses, as well as seek appropriate treatment for substance use disorder.
- APhA is engaged in multiple efforts to promote pharmacists' role in both administering vaccinations and promoting vaccine confidence throughout their communities.

¹ American Association of Colleges of Pharmacy (2022, May 19). Healthy People 2030 Dashboard. Tableau Public. Retrieved October 23, 2024, from <https://public.tableau.com/app/profile/aacpdata/viz/HealthyPeople2030DashboardDraft/HPDashboard>

² Guidance for Pharmacy Curricula to Incorporate Health, Wellness, and Health Inequities Stemming from Climate Change: The Report of the 2022–2023 AACP Argus Commission, Scott, Steven A. et al., American Journal of Pharmaceutical Education, Volume 87, Issue 12, 100612

³ (2024, June 14). PharmD Program Accreditation. Accreditation Council for Pharmacy Education (ACPE). Retrieved October 23, 2024, from <https://www.acpe-accredit.org/pharmd-program-accreditation/#tab-Standards>

- APhA advocates for pharmacist-led diabetes self-management services for patients, increasing the proportion of people receiving formal diabetes education and appropriate drug therapies.
- APhA and Healthy People 2030 are both committed to promoting diversity, equity, and inclusion in health care personnel and services delivered to diverse patient populations. In regard to promoting health equity, studies have found that minority communities “have worse air quality, minimal green space, and higher risks of heat-island effects, as well as elevated rates of cardiovascular disease, hospitalizations for asthma, poor birth outcomes, and other diseases, thereby increasing vulnerability to the adverse health effects associated with climate change.”⁴
- APhA continually develops resources to help combat burnout and helps pharmacists and pharmacy personnel find success and satisfaction in their work.

Both AACP and APhA are active members of the International Pharmaceutical Federation (FIP), a global body for pharmacy, pharmaceutical sciences and pharmaceutical education. In 2023, FIP released an international roundtable report on “*Sustainability in health care: The role of the pharmacist and pharmacy practice*” which provided priority action areas to support pharmacy globally.⁵ Such action areas included:

- Addressing environmental health issues.
- Measuring the impact of pharmacy practice.

We believe that the incorporation of this new objective will aid pharmacy efforts on an international level by providing the next generation of pharmacists with the proper training and tools to have a positive effect on environmental health concerns pertaining to pharmacy. We are also grateful for our members who are helping to lead the charge on researching connections between environmental health and pharmacy and how they can be seamlessly integrated into the current curriculum without undue burden.

To accomplish any goal, a baseline must be established. A 2023 survey of 500 registered pharmacists in Ohio, conducted by individuals who are also members of both AACP and APhA, assessed pharmacists’ knowledge and beliefs regarding climate change and health.⁶ They found that most respondents recognized that climate change is happening. However, many did not recognize its potential impact on their own patients or their role in climate action, showing a need for more education on this topic.

⁴ (2023, March 8). The Climate Gap and the Color Line — Racial Health Inequities and Climate Change. The New England Journal of Medicine. Retrieved October 29, 2024, from <https://www.nejm.org/doi/full/10.1056/NEJMs2213250>

⁵ (2023) International Pharmaceutical Federation (FIP) Sustainability in health care: The role of the pharmacist and pharmacy practice. Report from an international roundtable. FIP. Retrieved October 23, 2024, from <https://www.fip.org/file/5566>

⁶ (2023) T Speck, C. L., DiPietro Mager, N. A., & Mager, J. N., 3rd. Pharmacists’ perception of climate change and its impact on health. Journal of the American Pharmacists Association: JAPhA, 63(4), 1162–1167. <https://doi.org/10.1016/j.japh.2023.04.004>

The brief report also highlights that knowledge and beliefs regarding climate change and health or perceptions to its relevance to pharmacists and pharmacy practice have not been studied among pharmacists in the United States. The incorporation of this new objective may provide new impetus to conduct such research, and our members are willing and able to conduct this work to reach our 2030 vision.

APhA's House of Delegates has also passed the following relevant policy positions:

2023 Greenhouse Gas Emissions APhA urges implementation of strategies throughout the pharmaceutical product lifecycle (e.g., research, development, manufacturing, marketing, distribution, dispensing, use, and disposal) to achieve net zero emissions by 2050. (JAPhA. 63(4):1266; July/August 2023)

2007, 1992 Recycling of Pharmaceutical Packaging APhA supports aggressive research and development by pharmacists, pharmaceutical manufacturers, waste product managers, and other appropriate parties of mechanisms to increase recycling of non-hazardous, pharmaceutical, packaging materials, to reduce unnecessary waste in pharmaceutical product packaging, and to minimize the opportunity for counterfeiters to use discarded packaging. (Am Pharm. NS32(6):516; June 1992) (Reviewed 2004) (JAPhA. NS45(5):580; September/October 2007) (Reviewed 2012) (Reviewed 2017)

2001 Syringe Disposal APhA supports collaboration with other interested health care organizations, public and environmental health groups, waste management groups, syringe manufacturers, health insurers, and patient advocacy groups to develop and promote safer systems and procedures for the disposal of used needles and syringes by patients outside of health care facilities. (JAPhA. NS41(5)(suppl 1):S9; September/October 2001) (Reviewed 2007) (Reviewed 2012) (Reviewed 2017) (Reviewed 2020) (Reviewed 2023)

Pharmacists, student pharmacists, and pharmacy technicians all play a role in promoting, strengthening, and evaluating the nation's efforts to improve the health and well-being of all people. We recognize the importance of increasing the number of pharmacists that are well educated and equipped with knowledge on environmental health as it relates to public health. Here are a few questions we considered when conducting our research for this letter:

- In what ways can teaching environmental health enhance the ability of pharmacy graduates to contribute to public health, especially as it relates to sustainable pharmacy practices?
- What resources or support (faculty expertise, funding, materials) would be required to introduce or expand environmental health content in the pharmacy curriculum without causing undue burden on faculty and staff to do so?

- How can we ensure that faculty members are prepared to teach environmental health topics?

We appreciate the U.S. Department of Health and Human Services granting us the opportunity to comment on all new objectives that will aid the American people in living healthy lives by 2030. For more information, please contact Olunife Akinmolayan, AACCP Director of Policy, Advocacy, and Strategic Engagement (oakinmolayan@aaccp.org) and Michael Baxter, APhA Vice President, Government Affairs (mbaxter@aphanet.org).

Sincerely,

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