

August 5, 2019

The Honorable Alex M. Azar II Secretary of Health and Human Services 200 Independence Avenue, S.W. Washington, D.C. 20201

RE: Healthy People 2030 Updated Health Literacy Definition

Dear Mr Azar,

Thank you for considering a new definition of health literacy. We represent the Multi-Regional Clinical Trials Center of Brigham and Women's Hospital and Harvard and applaud the direction being taken by HHS to acknowledge that health literacy goes beyond an individual's capacity to understand to include the abilities of the people responsible for communicating health-related information. We recommend broadening the scope of this definition even further to include concepts that fall under the umbrella of health literacy to support clear communication such as plain language, numeracy, design, and culture. Further, other areas that relate to health and impact health-related decision making, including data literacy, clinical research literacy, and insurance literacy, should be mentioned. Substantively, we believe that the concept of "society" as included in the new definition put forth for Healthy People 2030 does not assign sufficient specific responsibility for ensuring clear, health-related communications and should be removed. As such, we put forth the following definition for your consideration:

Health literacy is the ability of all people in a position to share accurate and balanced health-related information to do so in ways that are easy for the intended audience to find, understand, and act upon. Health related content includes treatment, data, clinical research, and insurance information. Clear health-related communications incorporate plain language, numeracy, design, and cultural considerations.

Thank you for the opportunity to comment.

Respectfully submitted,

Barbara E Bierer, MD Director

bbierer@bwh.harvard.edu

Sarah A White, MPH **Executive Director**

sawhite@bwh.harvard.edu

Mark Barnes, JD Faculty Co-Director

Mark Suns

Mark.Barnes@ropesgray.com