May 19th, 2022

The Honorable Rachel L. Levine, MD
Assistant Secretary for Health
U.S. Department of Health & Human Services
200 Independence Avenue, S.W.
Room 715-G
Washington, D.C. 20201

Submitted electronically to OASHcomments@hhs.gov.

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

Dear Assistant Secretary Levine:

The American Psychological Association (APA), the leading scientific and professional organization representing psychology in the US, with more than 133,000 researchers, educators, clinicians, consultants, and students as its members and affiliates, welcomes the opportunity to respond to the US Department of Health and Human Services (HHS) Request for Information (RFI): 2022 HHS Environmental Justice Strategy and Implementation Plan Draft Outline.

The comments below represent broad guidance from the field of psychology to enhance the development of an Environmental Justice Strategy and Implementation Plan across six strategic elements. An effective environmental justice plan must improve resources for mental health and social services, engage stakeholders within marginalized communities, and equip environmental justice communities with effective tools to reduce health disparities.

APA is committed to supporting environmental justice through evidence-based practices and social and behavioral science, including a focus on the mental health effects of climate change. We applaud the Department’s efforts to confront environmental and health disparities and to effectively serve marginalized populations and communities disproportionately impacted by environmental burdens. These include establishing the Office of Climate Change and Health

750 First Street, NE
Washington, DC 20002-4242
(202) 336-5800
(202) 336-6123 TDD
Web: www.apa.org
Equity, pledging to lead the reduction of greenhouse gas emissions and air pollutants across the healthcare sector, and seeking wide input to inform federal activities addressing challenges at the intersection of systemic racism, health, and the environment.

Marginalized groups, including Indigenous peoples, communities of color, and communities that are economically disadvantaged, require targeted support to deal with the disproportionately large environmental risks and damages they face, which are exacerbating already significant health disparities.¹ These communities are more likely to be located in areas prone to extreme weather, higher levels of air and water pollution, and unhealthy living environments with fewer resources with which to protect themselves. For example, children, older adults, women, persons with disabilities, and outdoor workers bear greater impacts of climate change due to health, economic, and social factors. Growing recognition of these issues has led to policy efforts to achieve climate justice, part of the broader movement for environmental justice.²³⁴⁵⁶⁷⁸

Psychology’s unique role

Psychologists have multiple avenues to advance individual and collective health, well-being, and justice. Nearly all subject areas and approaches within psychology offer concepts, methods, and tools that can be applied or elaborated to address the disproportionate impact of environmental burdens, including climate change.⁹ As HHS develops an environmental justice strategy,
implementing a population health approach should ensure climate change driven mental health and psychosocial concerns are fully addressed through an approach emphasizing prevention and early intervention, engagement within and across diverse systems, and partnerships with key communities and stakeholders. Such approaches cultivate population-level capacity for mental wellness and resilience in communities that are often stricken by environmental tragedies.\textsuperscript{10}

The following are responses to the questions prompted by the implementation plan draft outline:

**Services**

HHS must expand access, resources, and funding opportunities to provide marginalized communities with social services and mental healthcare in the face of environmental burdens. It is crucial to center people of color and disadvantaged, vulnerable, low-income, marginalized, and Indigenous populations for these services. HHS should also acknowledge the intersectionality of environmental burdens by addressing the ways in which gender identity, disabilities, sexual orientation, and ethnicity interact with other systems of injustice.\textsuperscript{1} HHS must review all environmental justice programming to ensure mental health is represented as prominently as physical health.

Mental health outcomes, particularly for populations made vulnerable by social and economic circumstances, are intertwined with the environmental burdens communities face. Educational and occupational opportunity, poverty, access to safe housing, adequate nutrition, and affordable medical care intensify risk for some groups. These social factors, described in detail by the World Health Organization, are known as the social determinants of mental health.\textsuperscript{11} Physical and mental health complications are significantly more likely among members of groups with the lowest access to wealth, power, and status, namely people of color, Indigenous people, immigrants, people with disabilities, older adults, women, children, and LGBTQIA+ individuals.


Partnerships and Community Engagement

HHS can promote health equity by establishing direct partnerships with liaisons from environmental justice communities. HHS must explore the sources of the disadvantages in these populations, creating reparative and equitable partnerships that incorporate the history of environmental justice in these populations. Marginalized communities who are engaged in civil conflicts related to problematic legislative statues that proliferate environmental injustices, must receive greater support.12

Policy Development and Dissemination

Training and workforce development programs are vital to improve health outcomes for environmental justice communities. For example, HHS can develop and enact more equitable job training programs that focus on offsetting economic disadvantages and unemployment. Healthcare infrastructure policies must also explicitly acknowledge and assess environmental harms impacting a patient’s health. HHS can create interdepartmental procedures for collecting data and reporting compliance issues, within impacted communities.

Research and Data Collection, Analysis, and Utilization

Equitable research approaches and comprehensive data collection are necessary to track public understanding of environmental inequities or their determinants that can inform training programs, communications, and decision-making tools.13 HHS should develop regional and national high-quality, scientific probability-based surveys to collect public understanding of environmental and climate-related inequities and vulnerabilities, their causes, and potential solutions, and the social, psychological, economic, political, and sociocultural bases of these understandings. Surveys must include funding for the development of open data repositories for research use, accessible to both academics and non-academics, and coordination mechanisms among academic researchers across the social and behavioral sciences and with the integration of

community partners, in ways that can inform the development of public communications, education, and health advocacy tools to inform public understanding and decision making.\textsuperscript{14}

Research funding should also highlight investigators from groups historically impacted by institutional practices and policies that have exacerbated disparities. Qualitative and community participatory research, paired with environmental justice grants, are key to assisting communities directly impacted by injustices.\textsuperscript{15} Community listening sessions and town halls are needed to facilitate direct community engagements with HHS and gauge research needs in participatory action research. Community-needs assessments represent an essential tool for engagement to foster transparency and collaboration.

\textbf{Education and Training}

HHS must coordinate with other federal agencies provide opportunities to obtain careers in green jobs for those in environmental justice communities.\textsuperscript{15} These roles create mechanisms for community stakeholders to influence policy decisions and gain education and training to engage with harmful policies more effectively. Training solely to ameliorate economic disadvantages is insufficient to compensate for a history of economic and housing disparities experienced by many marginalized communities in disproportionately polluted areas. Land-use and zoning laws regularly create difficult situations for communities to address environmental injustices, which necessitates further advocacy and political education for communities. The healthcare system must create better training models for mental and physical health in order to identify and address the impacts of environmental injustices on patient populations.

\textbf{Performance Measures}

HHS should incorporate community participation to evaluate progress and potential success. Measures of performance must rely on the experiences of those impacted by the environmental


injustices. Periodic climate surveys related to compliance with policies and procedures outlined in the strategy plan are necessary.

APA looks forward to a close collaboration with HHS as this plan is further developed and implemented. Please contact us with any questions, I can be reached at kmcguire@apa.org.

Katherine Burnett McGuire, MS
Chief Advocacy Officer, APA