



March 13, 2023

The Honorable Richard Hudson  
2112 Rayburn House Office Building  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Anna Eshoo  
272 Cannon House Office Building  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Hudson and Representative Eshoo:

Thank you for the opportunity to provide input on the reauthorization of the Pandemic and All-Hazards Preparedness Act (PAHPA). Trinity Health is committed to using lessons learned during the COVID-19 pandemic to inform public policy and better prepare for future pandemics.

Trinity Health is one of the largest multi-institutional Catholic health integrated care delivery systems in the nation, serving diverse communities that include more than 30 million people across 26 states. We advocate for public policies that promote care for the common good and advance our mission, including fair payment, a strong workforce, coverage for all that bridges social care, and total cost of care payment models.

#### **Build Strong Preparedness Infrastructure**

Our nation's public health infrastructure is too weak to support a pandemic. Years of underfunding and a patchwork of varying capabilities across states and localities has left public health agencies unable to meet demand. Public health legal authority eroded during the pandemic resulting in conflicting approaches to education, surveillance, protection, vaccination outreach and testing. There was significant variation across neighboring jurisdictions. A national response strategy is needed that includes clear roles and responsibilities, creation of national vaccine registry, surveillance program, data collecting and reporting, and contract tracing.

Trinity Health is encouraged to see the establishment of a new Office of Pandemic Preparedness and Response Policy within the White House tasked with coordinating federal pandemic response and developing a preparedness outlook report. This accountability and leadership from the federal government should support a consistent strategy across the country. Trinity Health urges this office to coordinate with the Assistant Secretary for Preparedness and Response (ASPR) on development of the National Health Security Strategy (NHSS) to not duplicate efforts.

Trinity Health encourages Congress to consider the following recommendations to support preparedness infrastructure:

- Ensure public health departments have full legal authority to do their job and are held accountable to consistent standards.
- Allow federal agencies to work directly with large health systems, similar to the relationship with retail pharmacies, to access and distribute vaccine and other medical countermeasures.
- Require development of a federal process or playbook for the unwinding of future public health and other long-term emergencies.

#### **Improve Response Capabilities**

America's health systems and hospitals met the pandemic head-on and have helped to fund and conduct critical public health services. Collaboration between local health departments and health systems formed a community response to the pandemic. However, health systems have faced fiscal

and workforce challenges that continue today. Health systems were required to report duplicative and inconsistent data across local, state and federal systems.

The pandemic quickly exhausted health care workers, worsening the already existing workforce shortage. This was further exacerbated by efforts to mobilize medical reservists who were pulled from their civilian medical roles in health systems.

Health systems had to rely on external staffing agencies to maintain appropriate levels of care for patients. Agencies drove up rates, with some agencies charging \$150-250/hour for nursing positions. Another driver of increased rates appeared to be related to FEMA contracts. Agencies drove up rates charged to health systems by \$20/hour or more when they got a new FEMA contract. It is unclear if this was price gouging or efforts to fill a need for bulk orders.

Trinity Health encourages Congress to consider the following recommendations to improve response capabilities:

- Support an interoperable data infrastructure and require standardized reporting to better inform strategy development and emergency response.
- Support efforts to facilitate health care worker movement across states, including expedited licensure review and expansion of licensure compacts.
- Consider using active-duty troops to reinforce the health care workforce to mitigate the risk that deploying reserve troops could take front-line workers out of hospitals.
- Commission a study on the effects of staffing agencies on the health industry during the COVID-19 pandemic.
- Strengthen cybersecurity defenses through development of coordinated national defensive measures; expansion of the cybersecurity workforce; disruption of bad actors that target U.S. critical infrastructure; and utilization of a “whole of government” approach to increasing consequences for those who commit attacks.

### **Fund Preparedness Efforts**

Financing to rebuild and sustain preparedness efforts is critical and it must include adequate funding for hospital preparedness. The Hospital Preparedness Program (HPP) provides the primary federal funding for health care system emergency preparedness. Through regional health care coalitions, the HPP has supported planning and response; facilitated the integration of public and private-sector emergency planning; and improved state and local infrastructures that help health systems and hospitals prepare for public health emergencies. However, funding for the HPP has not kept pace with the challenges faced by hospitals, health systems and our communities. Funding for the HPP has been cut in half over the past decade.

Trinity Health encourages Congress to consider the following recommendations to fund preparedness efforts:

- Authorize the Hospital Preparedness Program (HPP) at sufficient levels and ensure the funding reaches health care coalitions and hospitals.
- Allow regional and metropolitan hospital associations and health systems to compete to be the HPP awardee for their jurisdiction.

### **Ensure Supply Chain Coordination**

A supply chain that lacks public-private coordination and transparency resulted in wasted spend and avoidable duplication. There was little clarity or transparency around the content and quality of the Strategic National Stockpile, and supply chain needs left health care providers competing for personal protective equipment (PPE), testing kits and other testing materials, vaccine, and other pharmaceuticals.

Trinity Health's sophisticated supply chain was challenged to acquire supplies and get them where they were most needed amidst government efforts to divert those same supplies. The lack of sight into the vaccine supply chain led to confusion about who receives vaccine, when, and how much;

leaving health systems with little time to plan for receipt, storage and administration. And, what remains troubling is the significant dependency on international suppliers for PPE, pharmaceuticals, and other supplies.

Trinity Health encourages Congress to consider the following recommendations to ensure supply chain coordination:

- Replenish and develop transparent Strategic National Stockpile policies that include information on the inventory, product specification, location, quality and accessibility of the stockpile.
- Establish disaster simulations for distribution of vaccine and other medical countermeasures that include health systems and other providers.
- Develop a process to track the status of critical product shortages and require supply chain disclosure (location of raw materials, distribution channels) for medical product approvals.
- Establish a coordinated national supply chain through a public-private partnership that includes a "marketplace" for supplies with information on demand. This effort should be led by supply chain experts with government at the table.
- Provide additional tax incentives to expand domestic manufacturing of supplies.

Trinity Health is willing to serve as a resource as you reauthorize this important legislation. Please reach out to Maggie Randolph, Director of Public Policy and Analysis, at [margaret.randolph@trinity-health.org](mailto:margaret.randolph@trinity-health.org) with questions.

Sincerely,



Tammy Lundstrom, MD, JD  
Senior Vice President & Chief Medical Officer  
Trinity Health

Cc: The Honorable Cathy McMorris-Rodgers, Chair, Committee on Energy & Commerce  
The Honorable Frank Pallone, Jr., Ranking Member, Committee on Energy & Commerce