

## To the Office of Disease Prevention and Health Promotion

On behalf the [Health Literacy Network Germany](#) and [German Network for Health Services Research](#)

We would like to submit a written comment on the proposed update to the definition of health literacy.

### Comment:

We value the updated definition of health literacy, and we appreciate it addresses health systems design features as essential prerequisites for individual health literate decisions and actions. We are, however, not sure whether health literacy ‘occurs’ as a direct function of a societal environment; in our view this underestimates individual agency in terms of motivational aspects and people’s active contribution to the unfolding of health literacy.

The suggested new definition puts health literacy close to “competencies” a concept widely used in educational and occupational settings. Competencies are latent constructs that manifest when needed, they can be taught and their availability can be measured, preferably under defined conditions. We would agree with such a concept for health literacy, in deed the German translation of health literacy is health competence.

We therefore propose an extension, rather than a replacement, of the previous definition by integrating individual and environmental aspects.

Editing suggestions: Health literacy is the degree to which individuals are enabled by their educational, social, and/or health system to obtain, process, and understand health information needed to make appropriate health decisions.

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