

June 22, 2016

Bruce Gellin, MD, MPH
Deputy Assistant Secretary for Health
Office of the Assistant Secretary for Health
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

RE: Notice of Request for Information by the Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria

Dear Dr. Gellin,

On behalf of the National Association of City and County Health Officials (NACCHO), I am writing to share information with the Presidential Advisory Council on Combatting Antibiotic-Resistant Bacteria (Advisory Council) about ongoing efforts and strategies to combat antibiotic-resistance. NACCHO is the voice of the approximately 2,800 local health departments across the country that work every day to protect and promote health and well-being for all people in their communities.

The information below pertains to question two regarding how healthcare organizations can best educate and provide feedback to providers in healthcare facilities about infectious diseases diagnostic testing, optimal antibiotic prescribing, and infection prevention and encourage providers to report antibiotic use and resistance data.

NACCHO urges healthcare organizations to actively engage with their local health departments to share information and identify the ways in which they can collaboratively improve infection prevention, decrease unnecessary use of antibiotics, and reduce the spread of antibiotic resistance. As noted in the August 2015 CDC *Vital Signs* report on making health care safer, coordination between health departments and healthcare facilities is a critical factor in stopping the spread of antibiotic resistance.¹ Local health departments, in particular, are in an ideal position to coordinate activities to combat antibiotic resistance and promote stewardship, given the existing and potential engagement they have with the providers and facilities that provide health care within their communities. The following examples demonstrate how local health departments have engaged with healthcare facilities:

- The Florida Department of Health in Orange County launched a partnership with the state's Department of Health to collaborate in healthcare-associated infection prevention efforts and increase local capacity to respond to active outbreaks. After successfully piloting a joint project with a local long-term care facility, the health department is documenting their work in decreasing unnecessary antibiotic use through urine specimen collection and prescribing practices.²
- The DuPage County (IL) Health Department engages long-term care facilities and acute care hospitals to improve their understanding of local needs and approaches to the prevention of



healthcare-associated infections and multidrug-resistant organisms. These partnerships enable the health department to support regional planning and activities and assist local facilities in their efforts to decrease inappropriate use of antibiotics. More specifically, the health department provides resources to staff supporting infection prevention, including 1) facilitating quarterly educational sessions, 2) disseminating relevant reference materials, and 3) distributing customized “Get Smart About Antibiotics” posters to facilitate communication among staff and with residents, visitors, and family members about the appropriate use of antibiotics.²

- The Philadelphia Department of Public Health established a region-wide antimicrobial stewardship collaborative that includes acute care hospitals, long-term care facilities, non-profit organizations, and government agencies. The health department has also offered an educational webinar series on antimicrobial stewardship.²
- The Independence (MO) Health Department began participation in an antibiotic stewardship program in 2012 in response to an increase in antimicrobial-resistant infections in the community. The program sought to promote optimal antibiotic use and reduce instances of antibiotic-resistant disease by increasing communication and awareness in ways that required minimal effort by healthcare and childcare providers.³
- The Los Angeles County Department of Public Health increased reporting of certain antibiotic-resistant communicable diseases and partnered with the California Department of Public Health to support hospitals in following the statewide antibiotic stewardship legislation passed in 2008.⁴

These and other efforts that local health departments have undertaken are opportunities that healthcare providers, facilities, and other organizations can leverage to bolster their own approaches to educating healthcare staff about infectious diseases diagnostic testing, optimal antibiotic prescribing, and infection prevention and increasing reporting of antibiotic use and resistance data.

NACCHO appreciates the efforts that the Advisory Council is taking to learn about stakeholder efforts to combat antibiotic resistance. Thank you for the opportunity to provide information on this important matter. If you have any questions, please contact Lilly Kan, Senior Director for Infectious Disease and Informatics, at 202-507-4238 or llkan@naccho.org.

Sincerely,



LaMar Hasbrouck, MD, MPH
Executive Director

References:

1. Slayton, R.B, Toth, D, Lee, B.Y., et al. (2015). Vital Signs: Estimated Effects of a Coordinated Approach for Action to Reduce Antibiotic-Resistant Infections in Health Care Facilities — United States. *MMWR*, 64(30),826-831 August 7, 2015.
2. Baum, C. (2015). NACCHO Renews Commitment to Antibiotic Stewardship at White House Forum. Retrieved June 22, 2016 from <http://nacchopreparedness.org/naccho-renews-commitment-to-antibiotic-stewardship-at-white-house-forum/>
3. Public Health Foundation. Healthy Practices, Healthy People, Healthy Places: Story from the field. Retrieved June 22, 2016, from <http://bit.ly/1MXjhY9>
4. State of California. The California Antimicrobial Stewardship Program initiative. Retrieved June 22, 2016, from <http://www.cdph.ca.gov/programs/hai/pages/antimicrobialstewardshipprograminitiative.aspx>