

May 5, 2017

President Donald J. Trump
The White House
1600 Pennsylvania Ave NW
Washington, DC 20500

Dear President Trump:

On behalf of the National Association of County and City Health Officials (NACCHO), I am writing to provide comments to address the opioid epidemic sweeping across the nation. NACCHO is the voice of the nearly 3,000 local health departments across the country, in communities both small and large, rural and urban. These city, county, metropolitan, district, and tribal departments work to address public health issues in an effort to ensure communities and people are healthy and safe.

Every day, 78 Americans die of opioid and drug overdoses, costing more than \$78.5 million to taxpayers. The opioid epidemic has been driven by factors including poverty and unemployment; lack of access to healthcare; limited availability of treatment facilities (e.g., mental and behavioral health) and modalities (e.g., medication-assisted therapy); stigma; and prescribing practices.

Local health departments are key partners in protecting the health and well-being of their community and are instrumental in slowing the opioid epidemic. In addition to concern for opioid overdose, there is additional risk for poor health outcomes and bloodborne infections, including HIV, hepatitis C virus (HCV), and hepatitis B virus (HBV) among injection drug users. Substantial progress has been made in reducing HIV infections among injection drug users, but increases in injection drug use stemming from the opioid epidemic present a new set of challenges, particularly in rural and suburban communities. These areas often lack the public health and healthcare infrastructure and services to comprehensively address the epidemic, leaving communities vulnerable to infectious disease outbreaks. For example, the Appalachian states of Kentucky, Tennessee, West Virginia, and Virginia experienced a 364% increase in new HCV cases from 2006 to 2012, and a 114% increase in HBV from 2009 to 2013.⁸ Well-known is the outbreak of HIV among 200 local residents of Scott County, Indiana. This outbreak was the first time injection of prescription opioids was linked to an outbreak of HIV.

In accordance with NACCHO's policy statement [Prescription Drug Abuse and Overdose Response](#), I would like to highlight the critical role that local health departments play in supporting the prevention of prescription and illicit drug overdose and ensuring appropriate prescribing. NACCHO urges the administration to partner with local and state agencies to fund and support evidence-based strategies that utilize surveillance, cross-cutting partnerships, treatment and recovery, education, and legislation to prevent and mitigate the impact of this epidemic.

- **Surveillance:** NACCHO recommends increased local and state health department access to health care provider prescribing activities (e.g. prescription drug monitoring programs (PDMP), syndromic surveillance, and overdose response data, where collected). Local surveillance committees are valuable tools for identifying overdose trends, risk factors, and points of intervention. For instance, local poison death review committees are instrumental in determining the prevalence of prescription overdose and are key



contributors to state Health Burden of Injury reports. Moreover, national surveillance is integral in tracking the growing opioid abuse and misuse epidemic.

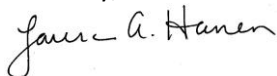
- **Cross-Cutting Partnerships:** Local task forces or coalitions, comprised of members from the public health, law enforcement, health care, treatment and recovery, and social services sectors, should be engaged with health care providers to address and mitigate the opioid epidemic, using a collective impact approach.
- **Treatment and Recovery:** NACCHO recommends expanding access to life saving rescue medications such as Naloxone or similar drugs to reverse drug overdose to first responders, patients, and family members or caregivers of patients; increasing access to effective substance-abuse treatment including drug replacement and maintenance therapy programs; and supporting local health department and law enforcement efforts to obtain these lifesaving drugs at reasonable costs.
- **Provider and Patient Education:** Local health departments can be critical partners in providing education to healthcare providers and patients about opioid misuse, abuse, and overdose, including risk factors, prevention strategies, and prescription security. Local health departments are also crucial partners in providing education and support to address community-wide efforts to prevent opioid overdose.
- **Legislation:** NACCHO recommends and supports laws that require healthcare providers to physically examine patients before prescribing prescription drugs, mandate the use of tamper-resistant forms for all controlled substance prescriptions, require patients to provide identification prior to filling a prescription for a controlled substance, and set limits on prescribing or dispensing controlled substances, with allowances for specialty clinics and pharmacies; regulations that require state oversight of pain management clinics or other specific requirements for registration, licensure, or ownership; and “Doctor shopping” regulations that prohibit patients seeking drugs from withholding from one healthcare provider information regarding other or prior treatments, visits, or prescriptions from another provider. In addition NACCHO recommends allowance for increasing pharmaceutical industry product stewardship initiatives that allow for safe disposal of unwanted prescription drugs that have significant potential for substance abuse and dependency. Also legislation is needed that will protect first responders and good Samaritans from liability in the event they attempt the rescue of a victim of opioid overdose.

In addition to these evidence-based strategies, NACCHO recommends directing funds toward public health prevention activities at local health departments to mount a comprehensive response toward the growing opioid epidemic and the devastating effects it is having at the community level. These funding efforts should be directed at the intersection of federal, state, and local efforts to fully respond to and prevent opioid overdose using surveillance and epidemiology, policy, system and environmental change, and establishing effective partnerships and planned response.

Prevention and response support should support efforts for local health departments and local communities to rapidly respond to spikes in opioid overdoses in the community with reversal drugs such as Naloxone, implement harm reduction strategies, institute prescription “take back” programs along with law enforcement, and provide education and support to health care providers and the broader community. NACCHO also encourages the administration to continue support for the Office of National Drug Control Policy, a strong voice in the fight against opioid and prescription drug overdose.

NACCHO looks forward to working with the administration and other federal agencies to address the issue of opioid abuse, and overdose, while ensuring appropriate patient access to pain management. If you have any questions or need any additional information related to our comments, please do not hesitate to contact Ian Goldstein, Government Affairs Specialist at igoldstein@naccho.org or 202-507-4273.

Sincerely,



Laura Hanen, MPP

Interim Executive Director/Chief of Government Affairs