



National Association of County & City Health Officials

The National Connection for Local Public Health

December 21, 2017

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

RE: Docket No. FDA-2017-N-5608-0001 for “Opioid Policy Steering Committee; Establishment of a Public Docket; Request for Comments”

Dear Commissioner Gottlieb:

The National Association of County and City Health Officials (NACCHO) is writing to provide comments to the Food and Drug Administration (FDA) in response to questions relevant to its Opioid Policy Steering Committee to combat the nation’s opioid epidemic. NACCHO represents the nation’s nearly 3,000 local health departments. These city, county, metropolitan, district, and tribal departments work every day to help ensure prevention and treatment options and resources are available to those affected by the opioid epidemic. NACCHO appreciates FDA’s work to seek solutions to address opioid misuse, both prescription and illicit.

Every day, 91 Americans die of opioid and drug overdoses, and the White House Economic Council has put the price tag for the opioid epidemic at \$504 billion for 2015. The opioid epidemic has been driven by multiple 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.

In accordance with NACCHO’s policy statement [Prescription Drug Abuse and Overdose Response](#), NACCHO 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 FDA to partner with local and state agencies to support evidence-based strategies that utilize surveillance, cross-cutting partnerships, education, and policies to prevent and mitigate the impact of this epidemic.

NACCHO Supports Mandatory Education for Health Care Professionals

NACCHO supports the FDA focus on the importance of ramping up provider education. NACCHO supports mandatory education for healthcare providers who prescribe prescription pain medication about the risk factors, but more importantly the provider must educate patients, and their families, about prescription drug abuse and overdose, including risk factors, prevention strategies such as the dispensing of naloxone to reverse overdose, and prescription security. It is important for providers to educate the public on prescription drug disposal as well. Education must be provided for healthcare providers about recommended prescribing guidelines, such as those outlined in the Centers for Disease



Control and Prevention's [Guidelines for Prescribing Opioids for Chronic Pain Healthcare](#). Providers should also be trained on new treatment options for substance dependence disorders.

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. FDA should partner with local health departments and the public health community to educate the public and healthcare providers to reduce suffering and death related to this epidemic.

NACCHO Supports Enhanced Monitoring of Prescription Opioid Distribution & Use for Better Public Health Outcomes

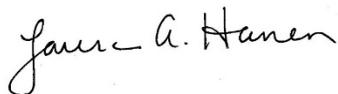
NACCHO also supports federal funding and technical support to states to enhance interstate data sharing among state-based prescription drug monitoring programs (PDMP) to better track patient-specific prescription data. Robust PDMPs would increase utilization by providers as a clinical tool to combat prescription misuse and diversion.

NACCHO recommends increased local and state health department access to information about health care provider prescribing activities, 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 and determining strategies that work.

Local health departments are tasked with monitoring the health of communities through surveillance systems and using data to alert policymakers and inform their programs. Prescription drug and illicit overdose, including fatalities, must be surveilled in order to monitor opioid use trends and examination of linkages with prescription drug abuse. NACCHO encourages local health department access to PDMPs to allow stakeholders to track prescriptions within states as well as cross-jurisdictional communication.

NACCHO appreciates the opportunity to provide input to FDA. As an essential governmental public health partner, we look forward to continuing to work with FDA to realize its goals. Please contact Eli Briggs, Senior Director of Government Affairs, for further information at 202-507-4194 or ebriggs@naccho.org.

Sincerely,



Laura A. Hanen, MPP
Interim Executive Director & Chief of Government Affairs