

NACCHO

National Association of County & City Health Officials

The National Connection for Local Public Health

February 27, 2017

Department of Health and Human Services
Food and Drug Administration
5360 Fishers Lane, Rm 1061
Rockville, MD 20852

RE: Docket No. FDA-2016-D-2635: The Judicious Use of Medically Important Antimicrobial Drugs in Food-Producing Animals; Establishing Appropriate Durations of Therapeutic Administration; Request for Comments

Dear Dr. Ostroff,

On behalf of the National Association for City and County Health Officials (NACCHO), I write to commend the Food and Drug Administration (FDA) for incorporating veterinary oversight in the use of medically important antimicrobials in food-producing animals and giving those agents an appropriate duration of use to minimize the risk of generating 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. These local health departments work with public health and community partners to prevent, monitor, and respond to antimicrobial-resistant infections and recognize the threat these microorganisms pose to their communities.

Local health departments are well-positioned to facilitate coordination among agencies to improve antimicrobial stewardship and prevent the spread of antimicrobial-resistant organisms, particularly given the growing understanding that coordination between facilities will have greater impact on preventing antimicrobial resistance than independent, individual facility efforts. Local health departments across the United States are already actively responding to antimicrobial resistance and promoting stewardship in the face of this burgeoning challenge. They are also increasingly collaborating with veterinarians, environmental health partners, and industry representatives as necessitated by the scope of this challenge.

Recognizing the potential impact that use of medically important antimicrobials in food-producing animals can have on the production of resistance, I laud FDA's work to ensure judicious use and bring the use of those antimicrobials under the supervision of a veterinarian in the context of a veterinary-client relationship. NACCHO supports the continued efforts of FDA to implement the National Action Plan for Combatting Antibiotic-Resistant Bacteria, slow the emergence of resistant bacteria, and prevent the spread of resistant infections and urges consideration of the valuable role that local health departments play in connecting community partners to combat antimicrobial 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 lkan@naccho.org.

Sincerely,



William Barnes, PhD, MBA
Acting Executive Director and Chief Program Officer

