



National Association of County & City Health Officials

The National Connection for Local Public Health

June 20, 2025

Acting Director Jon E. Rice
Office of National Drug Control Policy
Eisenhower Executive Office Building
17th Street and Pennsylvania Avenue, NW
Washington, DC 20504

RE: National Drug Control Strategy

Dear Acting Director Rice,

Thank you for the opportunity to submit comments on behalf of the National Association of County and City Health Officials (NACCHO). NACCHO is the voice of the over 3,300 local health departments across the country. Every day, local health departments are visible in the community working to keep their region safe, healthy, and economically productive. Local health departments play a critical role in responding to the nation's overdose epidemic and its related health consequences through locally tailored and informed strategies. These include improved surveillance and monitoring, increased prevention and education, targeted education of health care providers on promotion of appropriate opioid prescribing practices, and expanded treatment and recovery services for substance use disorder.

President Trump declared the opioid crisis a public health emergency in 2017, and since then local health departments have worked closely with the Office of National Drug Control Policy, Centers for Disease Control and Prevention (CDC), and other facets of the federal government on enhanced efforts to strengthen and better address the changing overdose threats in their communities. An effective response requires multiple sectors, and local health departments are key to bringing together the relevant entities for an effective response, while tailoring prevention strategies to meet their unique local needs.

NACCHO appreciates the Administration's urgency to save lives from substance use disorder and accidental overdose. As the Administration develops strategies and policy priorities to prevent and reduce substance use, NACCHO encourages ONDCP to consider the important role local health departments play as community leaders who are on the



frontlines of the drug overdose crisis and include them in national policy priorities. NACCHO appreciates the opportunity offer feedback on the proposed strategies that align with community intervention and offers the following recommendations.

1. Reduce the Number of Overdose Fatalities, with a Focus on Fentanyl

Objective: Decrease the number of drug overdose deaths nationwide

NACCHO appreciates that expanding access to overdose prevention education and life-saving opioid overdose reversal medications, like naloxone, is included at the center of the strategy to reduce overdose fatalities. Local health departments play an important role in distributing naloxone and fentanyl test strips and providing training and education to ensure community members know when and how to use these lifesaving tools.

In alignment with objective 1, NACCHO recommends incorporating additional evidence-based interventions that have demonstrated significant impact in reducing overdose deaths and related disease, like syringe services programs. In addition to drastic reductions in the incidence of HIV and HCV infection,^{i,ii} people who inject drugs who regularly use these programs are five times as likely to access substance use treatment and three times as likely to reduce or stop injection drug use than people who inject drugs who have never used one of these programs.ⁱⁱⁱ Local health departments are well positioned to implement comprehensive life-saving programs that include naloxone distribution, syringe services, and connections to other treatment and healthcare services.

An additional strategy that helps save lives are drug checking services, particularly in relation to fentanyl-related deaths. Studies have shown that people who use drugs would modify their behavior if they knew their drugs contained fentanyl.^{iv,v} Including fentanyl test strips and drug checking services would provide people with critical information to prevent overdoses.

Additionally, many states have adopted laws and policies that promote access to life-saving care,^{vi} including naloxone access laws, Good Samaritan laws, and Safer Reporting Laws. States with naloxone access and Good Samaritan Laws have experienced 14% and 15% reductions in opioid overdose rates, respectively.^{vii}

3. Stop the Flow of Drugs Across our Borders and into Our Communities

Objective: Decrease the domestic availability of illicit drugs



NACCHO recognizes the importance of addressing the domestic availability of illicit drugs and supports leveraging law enforcement systems appropriately to advance public health initiatives. Local health departments are uniquely positioned to implement evidence-based strategies that reduce demand and minimize impacts to the individual. In alignment with objective 3, NACCHO recommends incorporating diversion and deflection programs to address substance use at the community level. Diversion programs target the underlying problems that lead to criminalized behavior, improving long-term safety, reducing crime, and saving money.^{viii} Local health departments can partner with local criminal justice systems to implement pre-arrest and pre-charge diversion programs that connect people who use drugs with treatment and recovery services rather than incarceration.

In addition, policy reform support at the federal and state levels would enhance local health departments' ability to reduce drug-related impacts in their communities, including addressing laws that restrict access to clean syringes. Similarly, supporting policies that promote access to life-saving materials, like ensuring that fentanyl test strips can be purchased over the counter, would enable local health departments to implement more effective interventions. It is also important to research the potential impact associated with drug-induced homicide laws. While these laws have been introduced with the intention of reducing availability of illicit drugs, more research is needed to understand the potential for unintended consequences that could exacerbate the overdose crisis.^{ix}

6. Innovate in Research and Data to Support Drug Control Strategies

Objective: Obtain and apply high-integrity data to address the crisis.

Access to data is critical for local health departments to best prioritize and target their work. Efforts at the federal level, particularly through the Centers for Disease Control and Prevention's National Center for Injury Prevention and Control, provide timely and needed data that helps drive an effective response at the local level.^x Similarly, CDC maintains world-class laboratories that identify and disseminate information to health departments, law enforcement, and others on emerging threats in the drug supply. These federal-level assets—and their close connection to local and state health departments—should be maintained and supported.

NACCHO supports the use and further advancement of evidence-based strategies based on data to improve prevention and treatment strategies. Federal policy should ensure that local health departments have the flexibility they need to implement the most effective



strategies within the context of their communities. Moreover, the federal government should prioritize investments in local health departments to ensure that they can provide ongoing services within their communities. Local health departments receive federal funding through the CDC and the Substance Abuse and Mental Health Services Administration. Notably, CDC's Overdose Data to Action program invests in 49 states (and the District of Columbia) and 40 city, county, and territorial health departments to specifically address the overdose epidemic with data-informed, evidence-based public health strategies, directly in line with this objective. Continued investment in this program, particularly to expand the benefits to more local communities, would further help to leverage data to save lives.

NACCHO appreciates the opportunity to provide feedback on the Administration's Drug Policy Priorities. For questions about this response or for further dialogue, please contact Adriane Casalotti, NACCHO's Chief of Government and Public Affairs, at acasalotti@naccho.org.

Sincerely,



Lori Tremmel Freeman, MBA
Chief Executive Officer

ⁱ Platt, L., Minozzi, S., Reed, J., Vickerman, P., Hagan, H., French, C., ... & Maher, L. (2017). Needle syringe programmes and opioid substitution therapy for preventing hepatitis C transmission in people who inject drugs. *Cochrane Database of Systematic Reviews*, (9). doi: 10.1002/14651858.CD012021.pub2

ⁱⁱ Nguyen, T. Q., Weir, B. W., Des Jarlais, D. C., Pinkerton, S. D., & Holtgrave, D. R. (2014). Syringe exchange in the United States: a national level economic evaluation of hypothetical increases in investment. *AIDS and Behavior*, 18(11), 2144-2155.

ⁱⁱⁱ CDC. (2019, May 23). Summary of Information on The Safety and Effectiveness of Syringe Services Programs (SSPs). Retrieved June 19, 2025, from <https://www.cdc.gov/syringe-services-programs/php/safety-effectiveness.html>

^{iv} N.C. Peiper *et al.* [Fentanyl test strips as an opioid overdose prevention strategy: Findings from a syringe services program in the Southeastern United States](#). *International Journal of Drug Policy* (2019)

^v Sherman, S.G., Morales, K.B., Park, J.N., McKenzie, M., Marshall, B.D.L., Green, T.C. (2019). Acceptability of implementing community-based drug checking services for people who use drugs in three United States



cities: Baltimore, Boston and providence. *International Journal of Drug Policy*, 68, pp. 46-53. Retrieved from <https://www.ncbi.nlm.nih.gov/pubmed/30991301>

^{vi} Hamilton, L., Davis, C.S., Kravitz-Wirt, N., Ponicki, W., & Cerdá, M. (2021). Good Samaritan laws and overdose mortality in the United States in the fentanyl era. *International Journal of Drug Policy*, 97(103294). doi.org/10.1016/j.drugpo.2021.103294

^{vii} McClellan, C., Lambdin, B. H., Ali, M. M., Mutter, R., Davis, C. S., Wheeler, E., ... & Kral, A. H. (2018). Opioid-overdose laws association with opioid use and overdose mortality. *Addictive Behaviors*, 86, 90-95.

^{viii} Johnson, A., & Ali-Smith, M. (2022, April 28). *Diversion Programs, Explained*. Vera Institute. Retrieved May 2, 2022, from <https://www.vera.org/diversion-programs-explained>

^{ix} Carroll, J.J., Ostrach, B., Wilson, L., Dunlap, J.L., Getty, R., Bennett, J. Drug induced homicide laws may worsen opioid related harms: an example from rural North Carolina. *Int J Drug Policy*. 2021;97:103406.

^x CDC Overdose Prevention Data Resources. Retrieved June 19, 2025, from <https://www.cdc.gov/overdose-prevention/data-research/facts-stats/index.html>

