

November 24, 2017

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

RE: Docket No. FDA-2017-N-5056 for “2017 Scientific Meeting of the National Antimicrobial Resistance Monitoring System; Public Meeting; Request for Comments.”

Dear Ms. Abram,

On behalf of the National Association of County and City Health Officials (NACCHO), I am writing to provide comment on the 2017 Scientific Meeting of the National Antimicrobial Resistance Monitoring System (NARMS). NACCHO is the voice of nearly 3,000 local health departments across the country. These city, county, metropolitan, district, and tribal departments work daily to protect and promote health and well-being for all people in their communities. NACCHO’s comments pertain to the areas of stakeholder engagement and the exploration of strategies to leverage a One Health paradigm.

The NARMS system provides valuable insight into the estimated 1 in 5 resistant infections in humans caused by bacteria from food and animals.<sup>i</sup> NACCHO applauds the FDA, CDC, and USDA’s innovative collaboration through NARMS and offers the following comments and recommendations in response to the questions posed by the FDA.

NACCHO supports efforts to strengthen NARMS surveillance, increase data connectivity, and improve the system’s capability to explain the dynamics of resistance under a One Health paradigm. This strategy aligns with recommendations outlined in the 2015 National Action Plan for Combating Antibiotic-Resistant Bacteria and with many local health department efforts to coordinate infection prevention and control under a One Health framework to better identify linkages between humans, animals, and the environment and work across disciplines to address them. Accordingly, NACCHO supports the NARMS Review Committee recommendation to incorporate environmental resistance surveillance data. Not currently captured by NARMS, this data is a critical missing link in evaluating the relationship between the environmental resistome and the clinical resistome.<sup>ii</sup>

Local health departments play a critical role as the first line of defense in preventing foodborne illness at the local level and are also increasingly called to lead responses to outbreaks of antibiotic-resistant organisms. Investigating and responding to cases of antibiotic-resistant organisms in a variety of healthcare and community settings have equipped local health departments with the experience, expertise, and opportunity to improve antibiotic stewardship and prevent the emergence and spread of antibiotic-resistant bacteria in their communities. As partners to healthcare providers and leaders in the prevention and control of infections, local health departments represent critical contributors to and users of NARMS. Efforts to engage stakeholders therefore must include strategies for including local



health department representatives. While human surveillance is a core function of health departments and engagement of local health departments in this component of NARMS is vital, many local health departments also work across disciplines to proactively prevent spread of infectious diseases to humans by partnering with food retailers and agricultural stakeholders. As such, NACCHO encourages the inclusion of local health departments as key stakeholders in efforts to address and compliment NARMS surveillance activities.

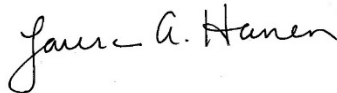
NACCHO stands ready to assist the FDA with engaging local health departments. Examples of engagement include the following:

- Recruiting highly qualified and experienced local health department representatives for the NARMS working group;
- Facilitating the review of recommendations, reports, action plans, and other materials by local health department representatives; and
- Encouraging local health department participation in state, regional, and national meetings that address antimicrobial resistance trends and interventions.

NACCHO lauds the leadership at FDA, CDC, and USDA for recognizing and working to address the multidisciplinary drivers of antimicrobial resistance and stands ready to work with FDA in strengthening stakeholder engagement and One Health approaches to antimicrobial resistance surveillance.

If you have any questions, please contact Michelle Cantu, Director for Infectious Disease and Immunization, at 202-507-4251 or [mcantu@naccho.org](mailto:mcantu@naccho.org). Thank you for the opportunity to provide comments on this proposed rule and input on this important matter.

Sincerely,



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

## References

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<sup>i</sup> Antibiotic Resistance from the Farm to the Table. (2015, November 16). Retrieved November 13, 2017, from <https://www.cdc.gov/foodsafety/challenges/from-farm-to-table.html>

<sup>ii</sup> Berendonk, T. U., Manaia, C. M., Merlin, C., Fatta-Kassinos, D., Cytryn, E., Walsh, F., Martinez, J. L. (2015). Tackling antibiotic resistance: the environmental framework. *Nature Reviews Microbiology*, 13(5), 310-317. doi:10.1038/nrmicro3439