

NACCHO

National Association of County & City Health Officials

The National Connection for Local Public Health

January 13, 2016

Thomas Frieden, MD
Director, Centers for Disease Control and Prevention
4770 Buford Highway NE., Mailstop F-63
Atlanta, GA 20241
Re: Docket No. CDC-2015-0112

Dear Dr. Frieden:

On behalf of the National Association of County and City Health Officials (NACCHO), I am writing to provide comments on the proposed Centers for Disease Prevention and Control (CDC) *Guideline for Prescribing Opioids for Chronic Pain* (Guideline). NACCHO is the voice of the 2,800 local health departments across the country. These city, county, metropolitan, district, and tribal departments work to address public health issues in order to keep people healthy and safe.

Every year, nearly 15,000 people die of overdoses involving prescription painkillers. In the past decade, deaths from prescription painkillers surpassed deaths from heroin and cocaine use combined.

As stated in NACCHO's 2014 policy statement "Responding to America's Prescription Drug Abuse and Overdose Epidemic," local health departments are critical to the prevention of opioid misuse, abuse, and overdose and ensuring appropriate prescribing through the following strategies: providing surveillance, establishing cross-cutting partnerships, creating pathways to access treatment and recovery, providing education to health care providers and first responders, and supporting legislation to prevent misuse and abuse.

NACCHO supports the Guideline and encourages engagement of local health departments in the recommendations that address "*Assessing Risk and Addressing Harms of Opioid Use*" (Recommendations 8-12). Local health departments can support healthcare providers' efforts to prevent the misuse, abuse, and overdose of prescription medications or controlled substances through the following strategies:

- **Surveillance:** Healthcare providers should be encouraged to engage state and local health departments to understand community-level surveillance around opioid abuse, misuse and overdose. NACCHO recommends increased local and state health department access to health care provider prescribing activities (e.g. prescription drug monitoring programs (PDMP)). 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 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.
- **Provider and Patient Education:** Local health departments can be a critical partner 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.
- **Treatment and Recovery:** NACCHO is supportive of co-prescribing of naloxone for patients on long-term opioids and where clinically appropriate. This may be necessary as it is difficult to predict which patients taking prescription opioids are at risk for overdose. Prescribing to all patients on opioids will help patients understand naloxone is being prescribed for risky drugs, not risky patients. Also, NACCHO supports improving access to effective substance-abuse treatment, including drug replacement and maintenance therapy programs, in an effort to support prevention of opioid abuse and overdose.

NACCHO commends CDC for its leadership in addressing this critical issue. We look forward to working with CDC and other federal agencies to address the issue of opioid misuse, 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 contact Vicky Bass, Government Affairs Specialist, at 202-463-8174 or ybass@naccho.org.

Sincerely,



LaMar Hasbrouck, MD, MPH
Executive Director

