

April 7, 2014

The Honorable Joe Pitts
United States House of Representatives
Chairman, Subcommittee on Health
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Frank Pallone, Jr.
United States House of Representatives
Ranking Member, Subcommittee on Health
2125 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Pitts and Ranking Member Pallone:

The Drug Policy Alliance is the nation's leading organization advancing alternatives to current drug policy that are grounded in science, compassion, health and human rights. Since 2000, the Drug Policy Alliance has promoted reforms that reduce harms both from drugs and ineffective drug policies. A major focus of our efforts is the advancement of policies at both the federal and state level that can help reduce fatalities from drug overdose. Overdose is now the number one cause of injury-related death in the United States, having surpassed injury-related deaths due to motor vehicle collisions. The sense of urgency around this public health crisis has never been greater.

The Drug Policy Alliance is writing in regards to the "Ensuring Patient Access and Effective Drug Enforcement Act," H.R. 4069, which is the subject of a hearing today by the Subcommittee on Health. Although the Drug Policy Alliance is encouraged that the Subcommittee on Health is taking action to address prescription drug misuse, which is a major risk factor for overdose, we are concerned that H.R. 4069, as currently drafted, misses an important opportunity to directly address and help abate the overdose crisis.

H.R. 4069 establishes a working group of expert stakeholders to examine prescription drug abuse. This "Prescription Drug Abuse Working Group" is assigned the duty of studying issues pertaining to the diversion of prescription medications from the industry supply chain and non-medical use of these medications. This working group is also tasked with issuing a report to Congress that contains specific recommendations to prevent or reduce prescription medication diversion and abuse for the Food and Drug Administration, Drug Enforcement Administration and other federal and state agencies.

The mission of this working group has potential to put forth important recommendations on ways to reduce harms from prescription medication diversion and abuse. We urge Members of the Health Subcommittee to incorporate overdose mortality and prevention into the mission of this working group. There is no greater consequence of prescription drug abuse than the loss of life to an overdose.



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Despite the scale of the overdose crisis across the United States today there is little coordination among federal and state agencies to reduce overdose fatalities. The “Prescription Drug Abuse Working Group” should be empowered to examine the effectiveness of existing Federal and community overdose prevention initiatives and make recommendations for reducing overdose mortality in its report to Congress.

The Drug Policy Alliance wishes to bring to the attention of Members of the Health Subcommittee relevant portions of H.R. 4169, the Stop Overdose Stat (S.O.S.) Act, which has been referred to this Subcommittee. In particular, section five of H.R. 4169 would create a task force similar in membership and scope to the “Prescription Drug Abuse Working Group” proposed in H.R. 4069 but for the purpose of developing a plan to reduce overdose fatalities. H.R. 4169 specifically directs the task force to develop a plan to reduce overdose deaths and issue a report to Congress that includes recommendations for improving and expanding overdose prevention programming.

In addition, section six of H.R. 4169 identifies several areas where research is needed that we urge Members of the Health Subcommittee to adopt as duties of the “Prescription Drug Abuse Working Group” authorized by H.R. 4069, should the Health Subcommittee proceed to legislative markup of H.R. 4069. These research areas include:

- Examination of circumstances that contribute to drug overdose and identification of drugs associated with fatal overdose; and
- Evaluation of existing overdose prevention methods; and
- Examination of scientific research concerning the effectiveness of overdose prevention programs; including how to effectively implement and sustain such programs

In addition, the Drug Policy Alliance encourages Members of the Health Subcommittee to incorporate into the “Prescription Drug Abuse Working Group” stakeholders identified in section five of H.R. 4169.

Given the scale of the overdose crisis and the lack of a robust and coordinated federal response, duties of the “Prescription Drug Abuse Working Group” should be expanded to consider the above objectives. Doing so could help mitigate the threat that overdose continues to pose to public health and safety and advance the goal of saving as many lives as possible. Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Piper". The signature is written in a cursive, slightly slanted style.

Bill Piper
Director, Office of National Affairs