



National Association of County & City Health Officials

The National Connection for Local Public Health

January 6, 2021

The Honorable Tammy Baldwin  
709 Hart Senate Office Building  
Washington, DC 20510

Dear Senator Baldwin:

The National Association of County and City Health Officials (NACCHO) represents the nation’s nearly 3,000 local health departments across the country, who are responsible for safeguarding the health of all Americans and are on the front lines of the opioid overdose epidemic. NACCHO applauds your commitment to addressing this epidemic and appreciates the opportunity to inform your policy development related to naloxone.

The opioid overdose epidemic is a significant public health threat and national emergency that has only worsened during the COVID-19 pandemic – the Centers for Disease Control and Prevention (CDC) recently reported that the nation surpassed 100,000 overdose deaths in the last 12 months for the first time. This increase in overdose deaths can be attributed in part to the unique challenges of the COVID-19 pandemic, but also reflects pre-existing shortfalls in the public health response, including the inability to fully provide resources for overdose prevention.

In particular, naloxone is a critical tool in preventing opioid overdose fatalities. Local health departments, through Overdose Education and Naloxone Distribution (OEND) programs and other partnerships, are crucial procurers and distributors of free naloxone, both to other community organizations and the public. Given their role, local health departments are uniquely positioned to recommend policies to improve access to naloxone. NACCHO supports policies that expand access and availability to this opioid overdose reversal medication. Specifically, NACCHO recommends Senator Baldwin consider actions that will encourage standardization of over-the-counter (OTC) access, enhance knowledge of naloxone availability, and lower the price of naloxone.

*Over-the-counter access*

While access to naloxone at pharmacies without a prescription is now available in all 50 states, the incredibly complicated patchwork of state laws providing for its access causes confusion and misperceptions for both pharmacists and patients. This can lead patients to not seek out available naloxone from pharmacies or to pharmacists denying eligible patients the medication.<sup>1</sup> Full OTC access, a la the status of Plan B or other medications previously available by prescription only, would greatly reduce this confusion and increase access to naloxone. Greater uptake of naloxone from pharmacies would increase community availability and decrease pressure on naloxone distributed free of charge from local health departments and their partners, particularly increasing availability for the under and uninsured or those who live in “medication deserts” where pharmacy access may be limited.

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<sup>1</sup> <https://www.dovepress.com/considering-the-potential-benefits-of-over-the-counter-naloxone-peer-reviewed-fulltext-article-IPRP>



The Food and Drug Administration (FDA) could remove this access barrier by approving naloxone for OTC sale. The FDA has indicated it supports this policy and has even developed a Drug Facts label to encourage companies to enter the OTC market<sup>2</sup>. In the Senate, supporters of OTC naloxone access could urge the FDA to continue its proactive approach to development of OTC naloxone and even consider incentives to encourage manufacturers to enter the OTC market.

#### *Enhance public awareness*

Local health departments are the primary providers of public health education and information for their communities. Local health departments already spend significant time and resources on naloxone training, education, distribution, and related informative media campaigns, and further federal support is needed to ensure that these efforts are equal to the opioid overdose challenge in communities nationwide. Despite the efforts of local health departments and their partners, a 2018 CDC report found that although bystanders were present in over 40% of fatal overdose incidents, naloxone was rarely administered by a layperson<sup>3</sup>. Further direct funding local health department overdose prevention efforts could help increase naloxone knowledge among laypersons, which in turn could reduce the occurrence of fatal overdoses.

#### *Sufficient access to affordable, easy-to-use naloxone*

At this time, the two naloxone options on the market are 1) generic naloxone administered via syringe injection and 2) the naloxone nasal formulation NARCAN. Unfamiliarity with syringes and stigma around needle use have made NARCAN the preferred option for local health departments, their partners, and the community at large. However, NARCAN kits can cost as much as \$140, presenting a barrier for access. While local health departments, through OEND programs or other partners, provide naloxone free of charge, this can be a hugely significant expense during a time when local public health funding is stretched thin by the continuing pandemic.

NACCHO supports policies that reduce the price of naloxone, and particularly encourages the Senate to pursue policies that would facilitate the development of generic naloxone. An alternative would be for the federal government to use its purchasing power to provide NARCAN or other easy-to-use naloxone at a reduced cost to local health departments and other community overdose prevention programs.

As the overdose crisis continues to widen and claim more lives, it is critical that naloxone be readily available for local health department distribution or over the counter in all pharmacies. Providing over-the-counter access, enhancing public awareness, and supporting the development of generic nasal naloxone are all steps the federal government should consider for reducing harm and saving lives. NACCHO looks forward to continuing to work with Sen. Baldwin and Congress to address the life-threatening impact of the opioid overdose epidemic and associated harms. Please contact Adriane Casalotti, NACCHO Chief of Government and Public Affairs, at [acasalotti@naccho.org](mailto:acasalotti@naccho.org) should you have any questions or wish to discuss further.

Sincerely,

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<sup>2</sup> <https://www.fda.gov/news-events/press-announcements/statement-fda-commissioner-scott-gottlieb-md-unprecedented-new-efforts-support-development-over>

<sup>3</sup> Christine L. Mattson et al., Opportunities to Prevent Overdose Deaths Involving Prescription and Illicit Opioids, 11 States, July 2016 – June 2017, 67 MORB. MORTAL WK'LY REP. 34, 945-951 (2018).

A handwritten signature in black ink, appearing to read "Lori Tremmel Freeman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Lori Tremmel Freeman, MBA  
Chief Executive Officer