October 25, 2017

The Honorable Chris Christie  
Chair, President’s Commission on Combating  
Drug Addiction and the Opioid Crisis  
Office of Strategic Initiatives  
1600 Pennsylvania Ave.  
Washington, DC 20500

Dear Governor Christie:

On behalf of the Healthcare Distribution Alliance (HDA), we are pleased that the Commission on Combating Drug Addiction and the Opioid Crisis continues its important work to advance potential solutions to the ongoing challenges posed by the opioid epidemic.

The pharmaceutical distribution industry is committed to addressing this urgent public health crisis. Drug abuse and misuse is a complex and challenging problem that calls for a collaborative effort on the part of providers, pharmacists, distributors, manufacturers, health plans and state and federal authorities to address the root causes of the epidemic. While distributors do not prescribe or dispense drugs directly to patients, they do share a common goal with their healthcare partners, law enforcement officials and policymakers to provide a safe supply of medicines to those patients with legitimate medical needs and prevent diversion of those medicines throughout each step of the supply chain.

As logistics experts, we bring our experience on the frontlines of delivering critical medicines and supplies to more than 200,000 pharmacies, hospitals, long-term care facilities and clinics around the country, and we stand ready to work with stakeholders across the health system on measures that would have a meaningful impact on reversing the trend of opioid abuse and misuse. These include:

- Enhancements to state prescription drug monitoring programs;
- Appropriate guidelines for and limitations on opioid prescriptions;
- Steps to facilitate providers’ use of e-prescribing for controlled substances;
- Reduced barriers to coverage of alternative pain treatments, as well as greater access to naloxone in emergency situations; and,
- Improved patient education on safe use of pain treatments and on the options for disposing of unwanted medicines.
We also support continued analysis of the appropriate supply of opioid-based medicines, and were encouraged to see the Drug Enforcement Administration’s Diversion Control Division use its authority to reduce manufacturing quotas for these products.

Further, effectively engaging the broader healthcare community around this critical goal requires a shared understanding of how to proceed forward as a country. As you know, when Congress enacted the Ensuring Patient Access and Effective Drug Enforcement Act in 2016, it called for a joint report from various federal health agencies with jurisdiction over substance abuse and treatment, in consultation with a wide range of stakeholders, to develop recommendations on “how collaboration between Federal, State, local, and tribal law enforcement agencies and the pharmaceutical industry can benefit patients and prevent diversion and abuse of controlled substances.” This report was due to Congress in April 2017, but has not been completed.

We believe this report will provide a critical blueprint for our collective efforts to address the current epidemic at the federal, state and community levels. We respectfully request your support in ensuring this report is completed as soon as possible, so that policymakers, the broader stakeholder community and, if possible, your Commission can examine the recommendations and determine whether additional legislative and regulatory proposals are needed to address this crisis.

America’s pharmaceutical distributors stand ready to work collaboratively to secure and protect the supply chain and address the scourge of opioid misuse and abuse. We have included HDA’s policy recommendations as part of this letter for your consideration. We appreciate your ongoing leadership and collaboration on this serious public health issue.

Sincerely,

John M. Gray
President and CEO