



New York State Public Health Association (NYSPHA)

August 26, 2022

The Honorable Kathy Hochul
Governor of New York State
New York State Capitol
Albany, NY 12224

RE: NYSPHA recommends signing A9348 to establish a fentanyl abuse and overdose prevention task force to conduct a comprehensive study on fentanyl abuse and overdose prevention and to report on the findings and recommendations, with suggested modifications.

Dear Governor Hochul,

The New York State Public Health Association (NYSPHA) is pleased to provide our recommendations to you on this bill, which has passed both houses of the legislature. NYSPHA is the New York affiliate of the American Public Health Association (APHA) and serves as the statewide organization for members from all disciplines across the spectrum of public health professionals, organizations, academia, and students pursuing careers in public health. Our mission is to improve the public's health through advocacy, education, networking, and professional development.

The above referenced bill proposes the establishment of a fentanyl abuse and overdose prevention task force, referred to hereinafter as the "task force" to conduct a comprehensive study on fentanyl abuse and overdose prevention and to report on the findings and recommendations of the task force. This is an extremely timely issue as non-pharmaceutical fentanyl is highly potent adulterant being found in a wide range of drugs and is driving opioid-related fatal and non-fatal overdoses. In 2019 alone, NYS saw 2,939 overdose deaths related to opioids and a 200% increase from 2010 (1,074 deaths) to 2017 (3,224 deaths).

The NYSPHA Policy and Advocacy Committee strongly supports the establishment of such a committee but makes the following recommendations:

- 1) **Eliminate "Abuse" from the name of the task force:** To encourage and normalize non-stigmatizing language related to drug use and people who use drugs we would suggest eliminating the word "abuse" from the name of the task force, so it simply reads "Fentanyl Overdose Prevention Task Force" (see Botticelli and Koh, JAMA, 2016)
- 2) **Consider people who use non-opioid drugs:** Given that fentanyl has been increasingly added to other drugs (including stimulants such as cocaine and methamphetamines), we urge the committee to consider a wide range of drugs within the context of addressing opioid overdoses due to fentanyl.

- 3) **Keep an eye on new emerging adulterants in drugs:** While fentanyl is still driving the opioid epidemic, we urge the task force to anticipate and address new emerging adulterants as they enter the unlicensed drug supply. For example, most recently, xylazine, (a non-opioid medication used as a sedative and muscle relaxant in veterinary medicine) is increasingly added to street drugs and is often found in combination with fentanyl.
- 4) **Include community members on the task force:** We request that community stakeholders also have a minimum of one spot on the task force. These members could be peer advocates, or people who work at syringe services programs and overdose prevention centers in New York City and across the state. Their voices as people with lived experience and as service providers will be integral to addressing the overdose epidemic we are currently facing.

Sincerely,



Guthrie Birkhead, MD, MPH
Chair, Policy and Advocacy Committee
New York State Public Health Association
advocacy@nyspha.org

CC: *Elizabeth Fine, Counsel to the Governor*
Karen Persichilli Keogh, Secretary to the Governor