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# PUBLIC SUBMISSION

**Docket:** CDC-2019-0021

The Drug Overdose Surveillance and Epidemiology (DOSE)

**Comment On:** CDC-2019-0021-0001

The Drug Overdose Surveillance and Epidemiology (DOSE) 19ACB

**Document:** CDC-2019-0021-0002

Comment from (Dan Eggleston)

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## Submitter Information

**Name:** Dan Eggleston

**Organization:** International Association of Fire Chiefs

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## General Comment

See attached file(s)

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## Attachments

IAFCOverdoseComments



# International Association of Fire Chiefs

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April 23, 2019

Dr. Jeffery Zirger  
Office of Scientific Integrity  
Centers for Disease Control and Prevention  
1600 Clifton Road NE  
MS-D74  
Atlanta, GA 30329

RE: Docket No. CDC-2019-0021

Dear Dr. Zirger:

On behalf of the more than 12,000 chief fire and emergency medical services (EMS) officers of the International Association of Fire Chiefs (IAFC), I would like to express the IAFC's strong support for the Centers for Disease Control and Prevention (CDC)'s proposed data surveillance system to monitor the frequency of hospital emergency department (ED) admissions for suspected drug, opioid, and stimulant overdoses. The IAFC believes that the development of such a monitoring system will be immensely beneficial in preparing our communities to anticipate and treat patients experiencing suspected overdoses.

As you know, fire departments are the primary providers of EMS across the United States. Firefighters and EMS personnel serve on the front lines of the nation's opioid epidemic and answer thousands of calls each day for suspected or confirmed overdoses. While fire departments work to maintain a constant state of readiness to care for critically ill and injured patients, the volume of patients experiencing suspected or confirmed overdoses places immense strain on fire department staffing levels and budgets.

Many fire departments track their own responses and can reasonably predict when "bad batches" of opioids or other drugs may be circulating in their community and causing a spike in overdoses. The Overdose Detection Mapping Application Program (ODMAP), which is supported by the U.S. Drug Enforcement Administration, is utilized by many fire departments and gathers data on overdose responses. ODMAP also is capable of issuing spike alerts when overdoses in a given area exceeds a pre-determined threshold. The data and alerts from ODMAP are immensely beneficial in understanding and addressing when a community is experiencing an unusually high occurrence of suspected and confirmed overdoses.

Despite the success of ODMAP, this program only gathers pre-hospital data. Fire departments are unaware of the exact patient load which their local ED may be experiencing due to patients who self-transport or otherwise arrive at an ED without engaging the pre-hospital EMS system.

This is a crucial piece of the puzzle, which if combined with fire department data, could give better insights on overdose trends in a locality or region. Real-time tracking and surveillance of clusters of overdoses can allow fire departments to better anticipate overdose-related call spikes and prepare to treat these patients. The IAFC strongly urges the CDC to move forward with this proposed data collection system as well as to integrate this data with the information that is already collected by fire departments and other pre-hospital EMS agencies nationwide.

Thank you for the opportunity to support this important project as well as your continued work to address the alarming numbers of opioid and other overdoses across the United States. The IAFC looks forward to continuing to work with the CDC to promote health and wellness in communities across the nation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dan Eggleston', with a long, sweeping horizontal stroke extending to the right.

Fire Chief Dan Eggleston, EFO, CFO, CMO  
President and Chairman of the Board

/ed

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**From:** NCIPC OMB (CDC)  
**Sent:** Tuesday, May 28, 2019 12:12 PM  
**To:** DanEggleston@/FN=7032739363  
**Cc:** NCIPC OMB (CDC)  
**Subject:** Docket No. CDC-2019-0021 - Drug Overdose Surveillance and Epidemiology (DOSE)

Chief Dan Eggleston  
President and Chairman of the Board  
International Association of Fire Chiefs (IAFC)

CDC appreciates the International Association of Fire Chiefs' (IAFC) support for the current emergency department data collection as well as the collaboration of emergency medical services agencies (EMS) with public health departments across the country in responding to the opioid overdose epidemic.

CDC agrees that ODMAP is a valuable tool to rapidly detect and respond to drug overdoses outbreaks and provides valuable information on patients experiencing an overdose that are transported to the hospital as well as patients who are treated, but refuse transport to the hospital. CDC is engaging in the following efforts to support the use and integration of ODMAP into coordinated multi-sector responses to drug overdoses outbreaks or increases:

- The U.S. Department of Justice, Bureau of Justice Assistance (BJA) in collaboration with the U.S. Department of Health and Human Services, Centers for Disease Control and Prevention recently released the following funding announcement, [ODMAP Statewide Expansion and Response Grant](#). The ODMAP Statewide Expansion and Response Grant is designed to support statewide adoption of ODMAP as well as support the development of highly coordinated public safety, behavioral health, and public health responses to the data, focusing on "hot spots" and trends of concern. Under this solicitation, up to six states will be selected for grant awards of up to \$700,000, each for a 24-month period.
  - During a webinar on May 30, 2019, at 1 p.m. ET, presenters will discuss the *Overdose Detection Mapping Application Program (ODMAP) Statewide Expansion and Response Grant*. Learn more and [register to participate](#).
- CDC recently released the [Overdose Data to Action \(OD2A\)](#) Notice of Funding Opportunity (NOFO) (CDC-RFA-CE19-1904) targeting all US states and territories as well as select cities or counties with high burden of drug overdose deaths. OD2A continues CDC work focused on: increasing comprehensiveness and timeliness of surveillance data; building state and local capacity for public health programs determined to be promising based on research evidence; making Prescription Drug Monitoring Programs (PDMPs) easier to use and access; and working with health systems, insurers, and communities to improve opioid prescribing. It adds new work focused on linkages to care and other areas of innovation supported by evidence-based practice. Parts of OD2A funding may be used by state and local health departments to support ODMAP or the linkage of ED and EMS data:
  - State and territorial health departments have the option to use the funding to implement or expand Overdose Detection Mapping Application (ODMAP) in their jurisdiction as part of an effort to build public health partnerships with Public Safety and First Responders (See Strategy 8)
  - State and territorial health departments also have the option of linking EMS and ED data as part of innovative surveillance efforts (See Strategy 3).

CDC looks forward to continuing to work with IAFC to address the opioid overdose epidemic.

IRB/OMB Office  
Centers for Disease Control and Prevention Chamblee  
National Center for Injury Prevention and Control  
email: [ncipcomb@cdc.gov](mailto:ncipcomb@cdc.gov)