

June 1, 2020

Stephen H. Hahn, M.D.  
Food and Drug Administration  
10903 New Hampshire Ave  
Silver Spring, MD 20993-0002

Dear Commissioner Hahn,

We sincerely appreciate the FDA's tireless efforts in battling COVID-19. In addition, we appreciate your recent comments at the 2020 Rx Drug Abuse and Heroin Summit relating to your understanding the pain that can come from chronic illness as well as the destruction caused by addiction to pain killers. We were also encouraged for your continued recognition that the opioid crisis remains a top priority for the FDA.

We are writing to you today, on behalf of our employers and their employees, to reinforce the importance of prioritizing non-opioid alternatives while balancing the need to put additional resources behind Covid-19 treatments. The recent FDA guidance relating to effects of COVID-19 indicates that there may be delays in certain areas and our hope is that this will not impact the important work the FDA is doing on opioid alternatives.

More than 28 states have reported increases in opioid-related mortality (see below for select state examples), and we believe this recent resurgence is putting the great progress we have made fighting the opioid epidemic at risk of being stalled.

One critical step to address this public health emergency is the continued evaluation of innovative and new non-opioids for postoperative and chronic pain. By encouraging use of non-opioid options, we can reduce patient exposure to opioids as well as the estimated one billion unused opioids available for abuse or misuse in the community.<sup>2,3</sup>

To support this request, I (we) have attached professional standards that have been adopted by the BCBS Association directing that opioids should not be prescribed as first or second lines of pain therapy in most clinical situations in an effort to limit the harm of opioids to their commercially insured population.

This standard was unanimously supported by the NCPE, a committee that includes medical officers and pharmacy experts from Blue Cross and Blue Shield (BCBS) companies around the nation, and aligns with recent CDC guidelines. It is designed to limit unnecessary harm for the 106 million members served by BCBS companies.

Thank you again for all the work the agency is doing during these challenging times. Our hope is to make sure we are not exacerbating one pandemic while focusing on another. We appreciate your consideration of these comments, as it is critical that American's have access to all non-opioid drugs through the commitment of the FDA to promptly approve these innovative products.

Sincerely,

## References

1. Wide-ranging online data for epidemiologic research (WONDER). Atlanta, GA: CDC, National Center for Health Statistics; 2020. Available at <http://wonder.cdc.gov>. Accessed June 1, 2020.
2. Hill, Maureen V., et al. "Wide Variation and Excessive Dosage of Opioids Prescriptions for Common General Surgical Procedures." *Annals of Surgery*. 265 (4): DOI: 10.1097/SLA. 0000000000001993.
3. Canfield, Marta C., et al., 2010. "Prescription Opioid Use Among Patients Seeking Treatment for Opioid Dependence:" *Journal of Addiction Medicine*. 4 (2): 108 -13. doi:10.1097/ADM.0b013e3181b5a713.

## State Reports

### 1. Arizona

**The battle of addiction during the time of novel coronavirus: Mental anguish, idle hands may be recipe for relapse.** <https://www.yourvalley.net/stories/the-battle-of-addiction-during-the-time-of-novel-coronavirus,154044> April 20, 2020.

### 2. Arkansas

**Number of Narcan 'saves' triple during COVID-19 pandemic.**

<https://www.thv11.com/article/news/health/opioids/saving-a-generation/number-of-narcan-saves-triple-during-covid-19-pandemic/91-20cbe0b2-8cf1-454f-9ac7-493e1e1a7546> April 22, 2020

### 3. California

**Man, woman overdose in car in Redwood Village; woman dies.**

<https://www.sandiegouniontribune.com/news/public-safety/story/2020-04-30/male-female-car-occupants-die-of-apparent-drug-overdoses> April 30, 2020

### 4. Colorado

**Struggling with addiction in quarantine? You're not alone.** <https://krdo.com/news/local-news/2020/04/23/struggling-with-addiction-in-quarantine-youre-not-alone/> April 23, 2020

### 5. Florida

**Jacksonville overdose calls increased 20% in March.** <https://www.news4jax.com/news/local/2020/04/14/jfrd-jacksonville-overdose-calls-increased-by-20-in-march/> April 13, 2020.

**Fake pills laced with fentanyl are causing overdoses in west Pasco, deputies say.**

<https://www.tampabay.com/news/pasco/2020/05/05/fake-pills-laced-with-fentanyl-are-causing-overdoses-in-west-pasco-deputies-say/> May 5, 2020

### 6. Georgia

**Addiction Recovery Leaders Say Opioid Crisis Didn't Stop When Pandemic Began.**

<https://www.gpbnews.org/post/addiction-recovery-leaders-say-opioid-crisis-didnt-stop-when-pandemic-began> April 20, 2020

## 7. Illinois

**DuPage sees 'unusual spike' in overdose deaths during coronavirus pandemic: coroner.**

<https://chicago.suntimes.com/2020/5/13/21257820/dupage-opioid-overdose-death-coronavirus-coroner-richard-jorgensen-covid-19> May 13, 2020.

**COVID-19 pandemic causes needle exchange programs to cut back.** <https://abc7chicago.com/needle-exchange-programs-chicago-syringe-coronavirus-program-covid-19/6206885/> May 23, 2020

## 8. Indiana

**An Indiana Police Dept. No Longer Reversing Overdoses During Pandemic.**

<https://filtermag.org/cops-naloxone-coronavirus/> April 24, 2020

## 9. Louisiana

**People who use drugs are more vulnerable to coronavirus. Here's what clinics are doing to help.**

[https://www.theadvocate.com/baton\\_rouge/news/coronavirus/article\\_f80cf77e-84fa-11ea-88d5-2b37dc9dd966.html](https://www.theadvocate.com/baton_rouge/news/coronavirus/article_f80cf77e-84fa-11ea-88d5-2b37dc9dd966.html) May 3, 2020

## 10. Maine

**Overdose risk during pandemic is tragic reality for some families.**

<https://www.pressherald.com/2020/04/20/overdose-risk-during-pandemic-is-tragic-reality-for-some-families/#> April 20, 2020

## 11. Massachusetts

**The Pandemic Has Changed Addiction Treatment, Some Hope For Good.\***

<https://www.wbur.org/commonhealth/2020/05/21/coronavirus-addiction-treatment-changes> May 21, 2020

## 12. Michigan

**20% increase in patients seeking substance abuse treatment.** <https://www.fox17online.com/news/local-news/grand-rapids/20-increase-in-patients-seeking-substance-abuse-treatment> May 2, 2020

**Push to telehealth means more medication to treat addiction in northern Michigan.\***

<https://www.interlochenpublicradio.org/post/push-telehealth-means-more-medication-treat-addiction-northern-michigan> May 7, 2020

## 13. Minnesota

**St. Paul Police Issue Alert After 28 Suspected Overdoses In 6 Days, 2 Deaths.**

<https://minnesota.cbslocal.com/2020/03/05/st-paul-police-issue-alert-after-28-suspected-overdoses-in-6-days-2-deaths/> March 5, 2020

## 14. Missouri

**Springfield area already sees uptick in suicides, ODs. Experts worry crisis is coming.** <https://www.news-leader.com/story/news/local/ozarks/2020/05/17/uptick-suicides-locally-mental-health-experts-warn-crisis-looms/5201866002/> May 16, 2020

## 15. Nevada

**Teen overdose deaths point to growing problem.** <https://www.kolotv.com/content/news/Teen-overdose-deaths-point-to-growing-problem-568505931.html> March 4, 2020

## 16. New Jersey

**Naloxone By Mail? What N.J. Addiction Help Looks Like During COVID-19.**

<https://www.wbgo.org/post/naloxone-mail-what-nj-addiction-help-looks-during-covid-19#stream/0> April 24, 2020

## 17. New York

**Columbia County reports second spike in overdoses since pandemic arrived.**

[https://www.dailyfreeman.com/news/local-news/columbia-county-reports-second-spike-in-overdoses-since-pandemic-arrived/article\\_e2493a20-85a3-11ea-993f-7bd5dfd43695.html](https://www.dailyfreeman.com/news/local-news/columbia-county-reports-second-spike-in-overdoses-since-pandemic-arrived/article_e2493a20-85a3-11ea-993f-7bd5dfd43695.html) April 23, 2020

**As overdoses spike, local experts remind people help is available.** (Albany, Greene, Rensselaer counties)

<https://www.timesunion.com/news/article/As-overdoses-spike-Capital-Region-experts-remind-15207385.php> April 17, 2020

## 18. North Carolina

**Increase in overdose emergency department visits seen in Carteret County.**

<https://wcti12.com/news/local/county-sees-increase-in-overdoses-resources-available-for-those-in-need> April 27, 2020

## 19. Ohio

**Health officials fear COVID-19 could trigger rise in drug overdoses.**

<https://www.dispatch.com/news/20200420/health-officials-fear-covid-19-could-trigger-rise-in-drug-overdoses> April 20, 2020

**Coroner: 6 overdose deaths in Franklin County Friday.** <https://www.nbc4i.com/news/local-news/coroner-6-overdose-deaths-in-franklin-county-friday/> April 25, 2020

**Ohio County Prosecutor: Pandemic Puts More Stress On Families Dealing With Addiction.**

<https://www.iowapublicradio.org/post/ohio-county-prosecutor-pandemic-puts-more-stress-families-dealing-addiction#stream/0> April 29, 2020

**HEALTH ALERT: Canton latest to close its syringe program.** <https://www.harmreductionohio.org/covid-19-updates-syringe-programs-ongoing/> March 29, 2020

## 20. Oregon

**'People are struggling': Oregon mental health groups make call to action during COVID-19.**

<https://www.kgw.com/article/news/health/mental-health-and-addiction-supports-during-covid19/283-633fa303-b276-4893-8f79-349aca351f13> May 1, 2020.

## 21. Pennsylvania

**Overdose deaths skyrocket in Pennsylvania during COVID-19 pandemic.**

<https://local21news.com/news/local/overdose-deaths-skyrocket-in-pennsylvania-during-covid-19-pandemic> (York and Cumberland counties) April 22, 2020

**Cumberland County coroner's office reports an uptick in overdose deaths during coronavirus pandemic.**

[https://cumberlink.com/news/local/crime-and-courts/cumberland-county-coroners-office-reports-an-uptick-in-overdose-deaths-during-coronavirus-pandemic/article\\_ad653521-dc48-5f8f-b6c0-359cdf90bb4d.html](https://cumberlink.com/news/local/crime-and-courts/cumberland-county-coroners-office-reports-an-uptick-in-overdose-deaths-during-coronavirus-pandemic/article_ad653521-dc48-5f8f-b6c0-359cdf90bb4d.html) May 3, 2020

**Syringe exchanges deemed 'life-sustaining' during Pa. coronavirus shutdown, raising hopes for eventual**

**legalization.** <https://www.post-gazette.com/news/health/2020/03/30/syringe-exchanges-pa-prevention-point-pittsburgh-needles-covid-19-addiction-services/stories/202003300062> March 30, 2020

## 22. South Carolina

**Spike in substance abuse seen in Aiken County as coronavirus disruptions continue.**

[https://www.aikenstandard.com/coronavirus/spike-in-substance-abuse-seen-in-aiken-county-as-coronavirus-disruptions-continue/article\\_beb128e4-7e59-11ea-96e3-07b824c80035.html](https://www.aikenstandard.com/coronavirus/spike-in-substance-abuse-seen-in-aiken-county-as-coronavirus-disruptions-continue/article_beb128e4-7e59-11ea-96e3-07b824c80035.html) April 15, 2020

## 23. Tennessee

**Opioid crisis sees impact of COVID-19 in Middle Tennessee.**

<https://www.wkrn.com/community/health/coronavirus/opioid-crisis-sees-impact-of-covid-19-in-middle-tennessee/> May 8, 2020

## 24. Texas

**WilCo sees spike in opioid overdose calls, counterfeit pills.** <https://talk1370.radio.com/articles/wilco-sees-spike-in-opioid-overdose-calls-counterfeit-pills> (Williamson County) April 17, 2020

## 25. Virginia

**Opioid Overdose Deaths Plunge in Virginia Counties After Influx of Naloxone. Harm reduction has worked, but causes for concern during pandemic remain.\*** <https://www.directrelief.org/2020/05/opioid-overdose-deaths-plunge-in-virginia-counties-after-influx-of-naloxone/> May 24, 2020

## 26. Washington

**Seattle sees spike in fentanyl overdose deaths.** <https://dailyhive.com/seattle/king-county-spike-overdose-deaths> April 24, 2020

## 27. West Virginia

**Police: Three people overdose on opioids at same time, same place in North Wheeling.** <https://wtov9.com/news/local/police-three-people-overdose-on-opioids-at-same-time-same-place-in-north-wheeling> May 16, 2020

## 28. Wisconsin

**Public health alert issued in Dane County following suspected rise in opioid overdoses.**

<https://www.channel3000.com/public-health-alert-issued-in-dane-county-following-suspected-rise-in-opioid-overdoses/> April 7, 2020

**Fentanyl overdose deaths on the rise in Milwaukee County.** <https://www.tmj4.com/news/local-news/fentanyl-overdose-deaths-on-the-rise-in-milwaukee-county> April 17, 2020

**Opioid crisis getting worse during COVID-19 pandemic, medical professionals say.** (Madison)

<https://www.nbc15.com/content/news/Opioid-crisis-getting-worse-during-COVID-19-pandemic-medical-professionals-say-569900351.html> April 23, 2020