



July 2, 2026

Robert F. Kennedy Jr.
Secretary
Department of Health and Human Services
Submitted to REPORTSCLEARANCEOFFICER@ahrq.hhs.gov

Re: HHS Request for Comment on Chronic Disease of Addiction

Dear Secretary Kennedy,

On behalf of Trust for America's Health (TFAH), thank you for the opportunity to respond to the Request for Information (RFI) regarding research, policy, and strategies to improve the prevention, treatment, and recovery of substance use disorder and mental illness. TFAH is a non-profit, nonpartisan public health policy, research, and advocacy organization dedicated to promoting optimal health for every person and community and making the prevention of illness and injury a national priority.

Through our annual report, *Pain in the Nation: The Epidemics of Alcohol, Drug, and Suicide Deaths*, TFAH tracks state and national mortality data and examines causes and solutions for these crises. After peaking in 2021, this year's report found that the combined age-adjusted rate of deaths from alcohol-induced, drug overdose, and suicide causes declined by 16 percent in 2024, building on a decrease of 4 percent in 2023.¹ Drug overdose mortality fell by 26 percent over the prior year. Critical to this progress is the work of the Centers for Disease Control and Prevention's (CDC's) National Center for Injury Prevention and Control (Injury Center). However, our report also finds that the reduction of Injury Center staff, funding instability, and proposed funding cuts put this progress at risk by limiting state and local health departments' capacity to prevent overdoses and other injuries in communities across the United States.²

The Injury Center empowers and funds public health departments and other partners to implement community-driven, evidence-based prevention strategies to reduce overdose, suicide, and adverse childhood experiences. Unique among federal agencies, CDC adopts a population-level approach to the underlying causes of negative behavioral health outcomes to maximize the impact of federal funding. The agency's laboratory expertise is critical to identifying rapidly emerging threats, including new synthetic opioids or contaminants in the illegal drug supply. Injury Center experts collect data and monitor changes in fatal and non-fatal overdose patterns, track regional utilization patterns, develop and evaluate prevention strategies, and provide practical guidance on topics ranging from safe opioid prescribing to best practices for distribution of naloxone.

¹ Warren, M., and Battle, L. "Pain in the Nation: The Epidemics of Alcohol, Drug, and Suicide Deaths." *Trust for America's Health*. June 2026. [TFAH_PainInTheNation2026_Fnl.pdf](#). Accessed June 15, 2026.

² Warren, M., and Battle, L. "Pain in the Nation: The Epidemics of Alcohol, Drug, and Suicide Deaths." *Trust for America's Health*. June 2026. [TFAH_PainInTheNation2026_Fnl.pdf](#). Accessed June 15, 2026.

Injury Center efforts also provide a critical complement to other federal approaches focused on prevention, treatment, and recovery from overdose and substance use disorder. For example, CDC overdose data help to inform Substance Abuse and Mental Health Services Administration recipients' efforts to distribute naloxone to the people and communities where it is most needed.

Overdose Data to Action

CDC's Injury Center funds the Overdose Data to Action (OD2A) program, which supports state and local jurisdictions in implementing prevention activities and in collecting accurate, comprehensive, and timely data on fatal and non-fatal overdoses and in using those data to enhance programmatic and surveillance efforts. OD2A currently supports 90 health departments across the country in addressing the evolving drug overdose crisis. OD2A is guided by a data-to-action framework that uses surveillance data, evaluation data, partner insights, and community feedback to select, strengthen, and scale drug overdose prevention programs and policies.³

At the center of the model is a focus on engaging partners and integrating people with lived experience into every component of the work. Funded jurisdictions are better positioned to respond quickly and effectively to their communities' needs, using data to guide required and optional activities that reduce overdose deaths and substance use-related harms.

Examples of State and Local OD2A Efforts

Through the OD2A program, the Kentucky River Hub operates as a Recovery Community Center that provides a wraparound model of care for individuals affected by substance use disorder. The Hub combines community-based overdose prevention, recovery-oriented support, basic needs assistance, and peer empowerment to address critical service gaps across the Kentucky River District.⁴ By improving access to care and helping reduce overdose deaths, the project advances key OD2A strategies, including linkage to treatment, recovery supports, and other overdose prevention services.⁵

New Jersey created the Five Minutes to Help program, funded by the OD2A-States program, to equip first responders with motivational interviewing skills they can use after reversing an overdose. The program addresses a critical gap, as more than 20 percent of overdose patients decline or leave medical care after an overdose event. Training is available in all 21 counties and includes online and in-person components. Since 2019, more than 2,200 participants—including first responders and instructors—have completed training, with the program expanding virtually to participants in several other states.⁶

³ "About Overdose Data to Action." Centers for Disease Control and Prevention. [About Overdose Data to Action | Overdose Prevention | CDC](#). Accessed June 15, 2026.

⁴ Ramsey, S. "The Hub Expands Recovery Support Across Eastern Kentucky." *Kentucky Injury Prevention and Research Center*. [The Hub Expands Recovery Support Across Eastern Kentucky | KIPRC](#). Accessed June 15, 2026.

⁵ "Strengthening Communities through the Overdose Data to Action Capacity Building Initiative." CDC Foundation. [Strengthening Communities through the Overdose Data to Action Capacity Building Initiative \(OD2A\) | CDC Foundation | CDC Foundation](#). Accessed June 15, 2026.

⁶ "Five Minutes to Help." Centers for Disease Control and Prevention. [Five Minutes to Help | Overdose Prevention | CDC](#). Accessed June 15, 2026.

The Wyoming Department of Health (WDH), supported through CDC’s OD2A-States program, analyzed state and national data and found that nearly 15 percent of Wyoming residents who died from drug overdoses between 2017 and 2022 worked in the construction industry. Using these findings, WDH launched an initiative in 2025 to improve access to naloxone among construction workers.⁷ In its first year, 209 construction organizations ordered naloxone at no cost. The ongoing effort aims to expand access to lifesaving overdose prevention and reversal tools and training in a high-risk workforce.⁸

In 2021, Louisiana had the third-highest overdose death rate in the nation, and fatal overdoses in Calcasieu Parish reached record levels. Local data showed that many people who died from overdoses had prior interactions with hospitals, emergency services, or the justice system and often had a history of substance use or previous non-fatal overdoses. In response, Southwest Louisiana launched a community overdose prevention strategy in 2022 that included the Louisiana Bridge program. Overdose deaths in the region declined 35 percent, and 2025 mortality data show a 43 percent decrease since implementation and community activation. After a successful pilot implementation, Louisiana Bridge expanded to include a statewide coordinator through the OD2A-States program.⁹

Conclusion

Countless individuals across the public and private sectors, and in communities throughout the United States, have worked to prevent alcohol, drug, and suicide-deaths and save lives. Their collective efforts have helped develop strategies, policies, and programs that have contributed to the recent decline in mortality. Continued investment in, and improvement of, systems such as CDC’s Overdose Data to Action program are essential to tracking emerging trends by geography, demographics, and drug type; guiding local, state, and national responses; and preventing overdoses and deaths in communities most in need. The recent progress is real—but it is not guaranteed to continue. Protecting and building on these investments will be essential to continuing to reduce overdose deaths in the decades ahead.

Sincerely,



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President and CEO
Trust for America’s Health

⁷ “Wyoming.” *The Naloxone Project*. [Wyoming — The Naloxone Project](#). Accessed June 15, 2026.

⁸ “Naloxone Builds Up Job Site Safety in Wyoming.” *Centers for Disease Control and Prevention*. [Naloxone Builds Up Job Site Safety in Wyoming | Overdose Prevention | CDC](#). Accessed June 15, 2026.

⁹ “A Bridge to Treatment in Louisiana Emergency Departments.” *Centers for Disease Control and Prevention*. [A Bridge to Treatment in Louisiana Emergency Departments | Overdose Prevention | CDC](#). Accessed June 15, 2026.