



November 1, 2019

The Honorable James W Carroll
Director, National Drug Control Policy
The White House
Washington, D.C. 20500

Robin Vos
Assembly Speaker
Wisconsin
President, NCSL

Martha R. Wigton
Director
House Budget & Research
Office
Georgia
Staff Chair, NCSL

Tim Storey
Executive Director

Dear Director Carroll:

Thank you for inviting the National Conference of State Legislatures (NCSL) to provide input on behalf of the nation's legislatures prior to drafting the 2020 National Drug Control Strategy. A comprehensive and collaborative strategy will be critical to successful drug control efforts at all levels of government. Our comments reflect our feedback and state policymaker perspectives based on the National Drug Control Strategy (2019 strategy) which we hope will be helpful to Office of National Drug Control Policy (ONDCP) moving forward with the 2020 version.

NCSL applauds and supports the 2019 strategy's references to strengthening the capacity of state, local, and tribal communities to identify and prevent substance abuse. Some of the excellent strategic goals in the 2019 strategy include:

- Proposed semi-annual trainings via the Drug Free Communities program to strengthen the prevention infrastructure within state and local communities.
- Federal participation in multi-jurisdictional task forces to enhance intergovernmental information sharing in national data systems.
- ONDCP's commitment to scale up support for state, tribal, and local drug courts in order to provide offenders struggling with addiction access to evidence-based treatment rather than incarceration.

NCSL also shares the 2019 strategy's view that internet drug sales require a sustained effort to disrupt the flow of illicit drugs shipped through the international mail following online sales and supports advance electronic data screening of inbound shipments to the U.S. to intercept these illegal substances. These goals should be continued in ONDCP's forthcoming 2020 National Drug Control Strategy.

NCSL does have some concerns with the 2019 strategy. While the 2019 strategy recognizes state governments as partners in the fight for drug control, this important concept lacks consistency throughout the document. This is most notable in the section that addresses disrupting drug supply chains internationally via border security. The 2019 strategy focuses primarily on international coordination rather than including reference to intergovernmental coordination at all levels of domestic government. Coordination among all of these entities is needed so that states have an equal say in law enforcement related to their jurisdiction and personnel. NCSL's position encourages the federal government to take a proactive role in securing our borders against importation of illicit drugs, and in detection and deterrence of interstate drug trafficking, but emphasizes cooperation with state and local law enforcement in that important process.

Additionally, the 2019 strategy contains several references to "model policy" or "model legislation" across a range of areas—good Samaritan laws, laws that allow naloxone dispensing via standing orders, laws that ensure informed patient consent prior to an opioid prescription, and others. The 2019 strategy is unclear as to the intent behind these statements. As a result, NCSL asks that our organization be consulted if state best practices are the goal. NCSL stands ready and welcomes the opportunity to work with ONDCP staff to craft a 2020 National Drug Control Strategy born out of true

intergovernmental collaboration. For additional information or questions, please contact Susan Frederick susan.frederick@ncsl.org 202-624-3566 and Lucia Bragg lucia.bragg@ncsl.org 202-624-3576.

Sincerely,



Representative Eric Hutchings, Utah
Co-Chair, NCSL Law, Criminal Justice &
Public Safety Committee



Representative Roger Goodman, Washington
Co-Chair, NCSL Law, Criminal Justice &
Public Safety Committee