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COMMISSIONER'S OFFICE
BUREAU FOR PUBLIC HEALTH

Brian Skinner, General Counsel
Bureau of Public Health
350 Capitol Street, Room 702
Charleston, WV 25301

July 21, 2017

Dear Mr. Skinner:

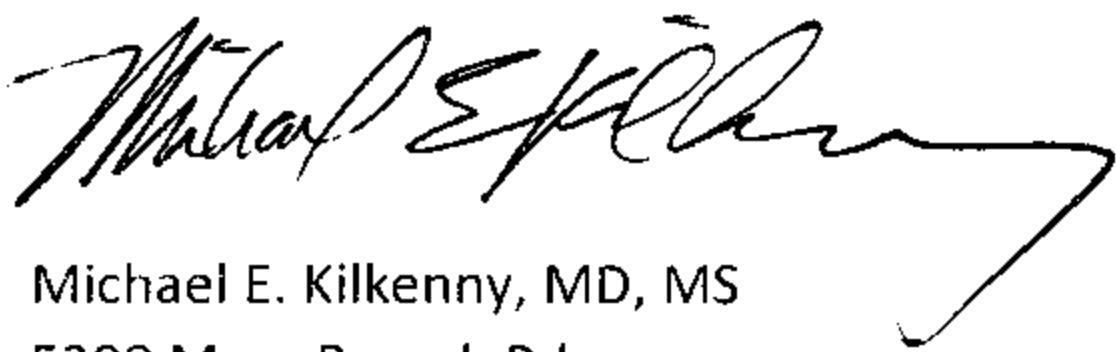
I am writing to make public comment regarding the proposed legislative rule Title-Series 64-105, Rule Name "Harm Reduction Programs."

As a physician working in public health and directing a harm reduction program in the State of West Virginia, I believe that there is an urgent need for public health response to the "Opioid Epidemic," which is really an epidemic of epidemics involving the spread of communicable diseases, alarming increases in preventable death due to opioid overdose, a nation-leading rate of neonatal abstinence syndrome, severe family disruption, and immense psychological trauma. Harm Reduction Programs include evidence-based and proven effective means to prevent and reduce the spread of communicable disease, to educate the public regarding this health condition, and to protect the environment by providing safe syringe disposal.

The proposed legislative rule improves the public health response to this epidemic by providing defining parameters which aid program development and by assuring review of emerging practices for safety and effectiveness. The rule protects existing legitimate Harm Reduction Programs currently operating without placing an undue burden on continued operation.

In summary, as a citizen of West Virginia, I support the proposed legislative rule as written.

Sincerely,



Michael E. Kilkeny, MD, MS
5200 Mays Branch Rd
Lavalette, WV 25535



KANAWHA-CHARLESTON HEALTH DEPARTMENT

PUTNAM COUNTY HEALTH DEPARTMENT



Michael R. Brumage, MD, MPH, FACP
Executive Director/Health Officer

July 25, 2017

Mr. Brian Skinner
General Counsel
Bureau for Public Health
350 Capitol St.
Charleston, WV 25305

Dear Mr. Skinner:

Re: 64-105, Harm Reduction Programs

Kanawha-Charleston Health Department supports these rules and encourages positive action by the legislature in approving them.

Harm reduction is a health promotion effort that offers participants the availability of education on reducing sexual and drug-use-related health risks, HIV counseling and testing, referral to drug treatment and other health care services.

Syringe exchange programs, which are part of harm reduction, provide sterile syringes and collect used syringes to reduce the transmission of HIV, viral hepatitis and other blood borne infections associated with the reuse of contaminated injection equipment by drug users.

Access to sterile syringes spares lives and saves taxpayers money. The Institute of Medicine has concluded that: "The cost-effectiveness of needle exchanges is estimated to range from \$3,000 to \$50,000 per HIV infection prevented."

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