DRUG POLICY ALLIANCE.

August 3rd, 2026

The Honorable Robert F. Kennedy, Jr.
Secretary, U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

SUBMITTED ELECTRONICALLY VIA WWW.REGULATIONS.GOV

RE: Proposed Data Collection Submitted for Public Comment and Recommendations (Docket No. CDC-2026-0859)

Dear Secretary Kennedy,

On behalf of the Drug Policy Alliance (DPA), we appreciate the opportunity to provide comments on the proposed information collection project titled National Survey of Syringe Services Programs. DPA is the leading organization in the U.S. working to address the harms of drug use and drug criminalization. We advocate for approaches to drugs that prioritize health, equity, social supports, and community wellbeing. We believe drug policies should be grounded in evidence, health, equity, and human rights.

The National Survey of Syringe Services Programs, created to assess and monitor syringe service programs (SSPs) operational characteristics and services, funding resources, community relations, and key operational and programmatic successes and challenges, provides powerful insights into how SSPs reduce the spread of blood-borne infection, fatal drug overdoses, and other harms from injection drug use. **We urge the Centers for Disease Control and Prevention (CDC) to continue to support and administer the National Survey of Syringe Services Programs, so that the progress we have made towards reducing the spread of infectious disease and fatal drug overdoses is protected and informed by the latest innovations in SSP service delivery.**

The *Ending the HIV Epidemic in the U.S.* (EHE) initiative, launched by President Trump in his State of the Union speech in 2019 and continued and expanded with bipartisan congressional support, aims to end the HIV epidemic in the U.S. by 2030.[1] The EHE initiative leverages and coordinates highly successful programs across the U.S. Department of Health and Human Services (HHS) agencies, including the CDC. One of the tools available in helping actualize this goal are SSPs.

SSPs are associated with an approximately 50 percent reduction in HIV and Hepatitis C Virus (HCV) incidence and create connections to other health services, including but not limited to, HIV and HCV diagnosis and treatment, medications for opioid use disorder (MOUD), soft tissue

[1] HIV.gov, Ending the HIV Epidemic in the U.S. Overview, retrieved from: https://www.hiv.gov/federal-response/ending-the-hiv-epidemic/overview

wound care, peer support, case management, and mental health services.[2,3] SSPs are extremely effective at distributing naloxone to high-risk populations, reducing risk of death from overdose.[4] Nearly 30 years of research shows that SSPs are safe, effective at reducing substance use and the spread of infectious disease, cost-saving, and do not increase drug use or crime.[5,6] That is why the American Academy of Addiction Psychiatry, American Bar Association, American Medical Association, and American Public Health Association all support SSPs. Congress has also recognized the value of SSPs, authorizing the use of federal funds to support the programmatic aspects of SSPs under certain circumstances since 2009.[7]

The CDC, in an effort to support a national network of SSPs, has partnered with researchers and other community-based organizations since 2022 to conduct the National Survey of Syringe Services Programs (NSSSP). This survey collects information on SSP characteristics, including the types of services offered, the number of participants served, funding streams, community relationships, and operational successes.[8]

The North American Syringe Exchange Network (NASEN) reports that there are at least 591 SSPs operating in the U.S.[9] The NSSSP collaborates with these providers in an effort to accurately track the public health impact of SSPs. The data collected by NSSSP are essential to the proper performance of the functions of the CDC, as well as to President Trump's stated priorities.

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[2] HIV.gov, Syringe Services Programs, retrieved from: https://www.hiv.gov/federal-response/other-topics/syringe-services-programs

[3] Smith J, Ballantyne B, Rodriguez Borja I, Erickson E, Philbrick S, Glick, S, Lambdin BH, & Patel SV (2026). Implementing Clinical Services within Syringe Services Programs. RTI International. https://doi.org/10.5281/zenodo.20044507

[4] Fischer LS, Asher A, Stein R, Becasen J, Doreson A, Mermin J, Meltzer MI, Edlin BR. Effectiveness of naloxone distribution in community settings to reduce opioid overdose deaths among people who use drugs: a systematic review and meta-analysis. BMC Public Health. 2025 Mar 25;25(1):1135. doi: 10.1186/s12889-025-22210-8. PMID: 40133970; PMCID: PMC11934755.

[5] Mackey KM, Beech EH, Williams BE, et al. Effectiveness of Syringe Services Programs: A Systematic Review. Washington (DC): Department of Veterans Affairs (US); 2023 Dec. Table 9, Public Health Organization and Professional Society Statements Regarding SSPs. Available from: https://www.ncbi.nlm.nih.gov/books/NBK598960/table/ch4.tab1/

[6] Carroll, J.J. (2023, Jan 23). Syringe services programs: A NACo opioid solutions strategy brief CORE STRATEGY. *National Association of Counties.* Retrieved from: https://www.naco.org/resource/syringe-services-programs-naco-opioid-solutions-strategy-brief

[7] Congresswoman Nancy Pelosi, Pelosi: Lifting the Ban on Federal Funding for Syringe Exchange is a Victory for SCience and for Public Health, retrieved from: https://pelosi.house.gov/news/press-releases/pelosi-lifting-the-ban-on-federal-funding-for-syringe-exchange-is-a-victory-for

[8] Patel, S., Humphrey, J., Wenger, L., Saunders, M., Strack, C., Philbrick, S. M., Rodriguez Borja, I., Smith, J., Kral, A.& Lambdin, B. (2025). Program and Operational Characteristics of Syringe Services Programs—Data from the National Survey of Syringe Services Programs, 2024 [Dataset]. RTI International. https://doi.org/10.5281/zenodo.15731106

[9] North American Syringe Exchange Network, retrieved from: https://www.nasen.org/

The NSSSP is necessary to realizing President Trump's stated goals of ending the HIV epidemic in the U.S and reducing overdose fatalities.[10] By surveying SSPs, the CDC can get a better picture of where federal resources are needed to support these evidence-based public health programs in reducing the number of incidences of infectious disease transmission, especially HIV and HCV, and overdose deaths. Additionally, the NSSSP provides updates and figures on how SSPs have continued to grow into hubs for other health and social services, connecting participants to substance use disorder treatment, primary care, and housing. The NSSSP has demonstrated how SSPs have adapted to meet the needs of the people they serve, such as during the COVID-19 pandemic, while simultaneously protecting the public and first responders through the disposal of used injection equipment.[11,12]

In the CDC's Priorities Statement, the CDC states it is "committed to strengthening our public health system and [...] protecting Americans from infectious [...] diseases and investing in innovation to prevent, detect, and respond to such public health threats."[13] Conducting the NSSSP helps further the CDC's priorities by informing the public of the operating characteristics of SSPs, how SSPs prevent, detect, and respond to infectious disease outbreaks, and where SSPs are having the most impact on American's health. This also helps track larger national trends in HIV and HCV infections through infectious disease testing done by SSPs at the local level.

The NSSSP is essential in collecting and disseminating the latest information from SSPs, providers who are often on the front lines of the battle against infectious disease and the harms of injection drug use. **The Drug Policy Alliance urges the CDC to continue to meaningfully partner with SSPs so that the NSSSP reaches as many respondents as possible, provides enough time to accurately and thoughtfully complete the survey, and is informed by those with the most knowledge of the colliding crises of infectious disease and drug overdose.**

Reducing the spread of infectious disease and lowering fatal drug overdoses are goals that President Trump, the CDC, and Congress share. While overdose and infection rates have decreased in recent years, our progress is fragile. We know that these downward trends are not uniform, as certain states and regions continue to see higher rates of new HIV infections and

[10] The White House, Office of National Drug Control Policy, National Drug Control Strategy 2026, retrieved from: https://www.whitehouse.gov/wp-content/uploads/2026/05/National-Drug-Control-Strategy-2026-1.pdf
[11] Glick SN, Prohaska SM, LaKosky PA, Juarez AM, Corcorran MA, Des Jarlais DC. The Impact of COVID-19 on Syringe Services Programs in the United States. AIDS Behav. 2020 Sep;24(9):2466-2468. doi: 10.1007/s10461-020-02886-2. PMID: 32333209; PMCID: PMC7182093.
[12] HIV.gov, Syringe Services Programs, retrieved from: https://www.hiv.gov/federal-response/other-topics/syringe-services-programs
[13] CDC Priorities, retrieved from: https://www.cdc.gov/about/cdc/index.html

overdose deaths.[14,15] In order to protect the progress we have made in eradicating HIV and reducing overdose deaths, we must continue to support evidence-based public health interventions such as SSPs. The NSSSP is the only survey of its kind and must continue to reach organizations on the front lines of these crises. **The Drug Policy Alliance urges the CDC to continue to solicit information from SSPs through the NSSSP, in order to protect the fragile progress we have made in reducing the spread of infectious disease and fatal drug overdoses.**

We appreciate the opportunity to submit comments. Should you have any questions or concerns, please do not hesitate to contact me at dfishbein@drugpolicy.org or (973)-202-6337.

Sincerely,

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[14] HIV.gov, U.S. Statistics, retrieved from: https://www.hiv.gov/hiv-basics/overview/data-and-trends/statistics
[15] Addy Bink, The Hill, Drug Overdose Deaths Declined Last Year, Except in These 8 States, retrieved from: https://thehill.com/homenews/state-watch/5878575-drug-overdose-deaths-declined-last-year-except-in-these-8-states/