



# COLLEGE of AMERICAN PATHOLOGISTS

---

October 31, 2017

Governor Chris Christie  
Chairperson  
President's Commission on Combating Drug Addiction and the Opioid Crisis  
Office of National Drug Control Policy  
Eisenhower Executive Office Building  
1650 Pennsylvania Avenue  
Washington, DC 20504

Re: President Commission's Interim Report on Combating Drug Addiction and the Opioid Crisis

Dear Governor Christie:

The College of American Pathologists (CAP) appreciates the opportunity to comment on the President's Commission's Interim Report on Combating Drug Addiction and the Opioid Crisis. As the world's largest organization of board-certified pathologists and leading provider of laboratory accreditation and proficiency testing programs, the CAP serves patients, pathologists, and the public by fostering and advocating excellence in the practice of pathology and laboratory medicine worldwide. Pathologists are physicians whose diagnoses and oversight of clinical testing drive care decisions made by patients, primary care physicians, and specialists. When other physicians need more information about a patient's disease, they often turn to pathologists who provide specific diagnoses and provide insight into laboratory results for each patient. The pathologist's role in diagnosis and clinical laboratory stewardship is a value recognized throughout the care continuum. This value is enhanced by the service rendered by forensic pathologists serving as medical examiners to accurately determine the ultimate burden inflicted upon society by the opioid epidemic.

As stewards of clinical laboratories, pathologists play a critical role in combating the ongoing opioid crisis. The CAP supports the efforts of pathologists who provide oversight and direction in the appropriate use of laboratory tests to detect and monitor the use of opioids and their ever-proliferating synthetic knock-offs. The CAP endorses the key role pathologists play in advising on clinical test selection to battle the many downstream effects of opioid use including HIV and Hepatitis C infection as well as detecting and treating organ damage (eg, liver, heart, kidney lung) and other effects such as bleeding (coagulation/transfusions). In addition, pathologists serve in a unique role as medical examiners documenting the spread of these sequelae throughout society. The CAP promotes the diverse roles that pathologists provide in education of healthcare practitioners and as advocates for the general public in interactions with policy makers and other laboratory professionals in testing for and the holistic treatment of opioid abuse and its downstream effects.



## COLLEGE of AMERICAN PATHOLOGISTS

---

The practice of pathology broadly includes clinical laboratory medicine (including molecular diagnostics) and anatomic pathology. The former includes toxicology and the latter includes forensic pathology. Pathologists and toxicologists perform the toxicology testing and drug monitoring in emergency rooms and hospitals, which is essential to diagnose and treat opioid use disorders across the country. Laboratories are constantly challenged to stay abreast of the ever changing landscape of novel opioids and other designer drugs. This challenge includes performing research to detect these new drugs and to understand their pharmacology, mechanism of action and side effects. Based on positive drug screen results, pathologists are uniquely positioned to recommend additional testing to screen for infectious diseases and side effects. Forensic pathologists perform the medicolegal death investigation and autopsies on overdose deaths, which are the source of the data for drug overdose deaths. Unfortunately, there is a critical shortage of forensic pathologists to work these cases. Federal assistance to State and local medical examiner/coroner offices, and efforts to increase the forensic pathology workforce are needed. The current report overlooks the role of the pathologist as an essential element in the medical response to the opioid crisis.

### Recommendations

The CAP believes the final report should:

- **Acknowledge the role that pathologists and laboratories play in detecting and identifying drug use/misuse, and in screening for its deleterious downstream health consequences.**
- **Recognize the essential role of clinical testing protocols in detecting use/misuse and monitoring clinical treatment.**
- **Recommend supporting the development of opioid drug Proficiency Testing programs, including those dealing with the rapidly changing field of synthetic and designer drugs (e.g., fentanyl, or carfentanil).**
- **Recommend increasing support for medical examiners programs to diagnose deaths due to drug overdose.**
- **Address the inadequate supply of forensic pathologists.**

The CAP greatly appreciates the opportunity to assist in the fight to combat the opioid crisis. Please contact Helena Duncan, CAP Assistant Director, Economic and Regulatory Affairs at [hduncan@cap.org](mailto:hduncan@cap.org) if you have any questions on these comments.

Closing,

R. Bruce Williams, MD, FCAP  
President

Enclosure(s): number of enclosures

*Sent via email*