



August 22, 2018

The Honorable John Howard
Director
National Institute for Occupational Safety and Health
Washington, DC

Dear Director Howard,

The National Safety Council (NSC) offers the following comments to the Board of Scientific Counselors as they consider the NIOSH approach to the opioid crisis as part of their September 27, 2018 meeting. NSC is a 100-year-old nonprofit committed to eliminating preventable deaths in our lifetime by focusing on injuries at work, at home and on the road. Our 15,000 member companies represent more than 50,000 U.S. worksites. As a proud partner and member of the *Total Worker Health* initiative, we commend the work that NIOSH does to improve workplace safety and health, and appreciate the increased attention NIOSH has recently given to the opioid crisis.

The United States is in the midst of a severe epidemic of opioid use disorder and deaths. Opioid overdose deaths, once rare in the United States, were 5 times higher in 2016 than in 1999.¹ An estimated 2.1 million Americans had an opioid use disorder in 2016, and a recent analysis of the National Survey on Drug Use and Health found that 75% of people with substance use disorder are employed.^{2,3} We know this epidemic is impacting our workplaces. In 2017 NSC conducted a survey of employers that found a few key takeaways:

- More than 70% of employers have been impacted by prescription drugs
- Only 19% feel extremely prepared to deal with prescription drug misuse
- 41% of those who drug test all employees are not testing for synthetic opioids
- 70% would like to help employees return to work following appropriate treatment

NSC is focused on defining and supporting the employer role in addressing this epidemic. Workplaces are a key avenue by which to communicate about the disease of addiction, treatment and recovery. Our free Prescription Drug Employer Kit is designed to help all employers establish policies and manage opioid use at work. Here are some of the resources the kit contains:

¹ Centers for Disease Control and Prevention: <https://www.cdc.gov/drugoverdose/epidemic/index.html>.

² https://www.samhsa.gov/sites/default/files/topics/data_outcomes_quality/nsduh-ppt-09-2017.pdf

³ <https://www.nsc.org/Portals/0/Documents/RxDrugOverdoseDocuments/Calculator-Methodology.pdf>



- *The proactive role employers can take: opioids in the workplace*, a comprehensive white paper including information on education, training, testing and more
- Resources for updating drug-free workplace programs
- Information on structuring benefits, including group health insurance, to include support for those suffering from SUDs
- Survivor advocate stories sharing the importance of vigilance and action
- Posters, safety talks, and other educational materials for communicating the dangers of opioids and addiction with employees

We encourage NIOSH to use the Prescription Drug Employer Kit in developing best practices on substance use disorders in the workplace. Employee assistance programs, health and wellness, and recovery are addressed in the toolkit, providing a solid and proven evidence-based foundation on which to build without reinventing the wheel.

NSC also collaboratively produced a [Substance Use Cost Calculator](#) to help employers understand the cost of addiction in their businesses. The calculator allows businesses to input basic statistics about their workforce such as industry, location and number of employees. The results show estimated prevalence of substance use disorders among employees and dependents, associated costs and potential savings if employees and their family members treat substance use disorders, helping to make the business case for action. Developed through scientific analysis, the Substance Use Cost Calculator provides the individual costs of alcohol, prescription pain medication, marijuana and illicit drug use. As you work to encourage employers large and small to take further action, we hope you will consider using this tool in making your case. NSC online tools are available at no cost to employers across the country.

Workplace injuries frequently result in opioids being prescribed, increasing accessibility to opioids for members of the household, even if the opioids are appropriately locked up and disposed of. Knowing that 75% of all opioid misuse starts with people using a medication that wasn't their personal prescription⁴, and that 90% of all substance use disorders start in the teenage and early adult years, NSC is working with partners to identify the most common ways in which teens are exposed to opioids, how they access opioids, and what specific factors lead to opioid misuse and addiction. I hope that the workers compensation programs' use of opioids and availability of other pain treatment options will be reviewed by the BSC.

Thank you for the opportunity to provide written comments to the Board of Scientific Counselors as they review NIOSH activities to combat the opioid epidemic. The resources provided by NIOSH are a worthy contribution to this fight and give us hope that together we can eliminate preventable overdose deaths.¹



Sincerely,

A handwritten signature in black ink, appearing to read "DAPH", with a long horizontal flourish extending to the right.

Deborah A.P. Hersman
President & CEO

⁴ <https://www.samhsa.gov/data/sites/default/files/NSDUH-DetTabs2014/NSDUH-DetTabs2014.htm#tab6-47b>

⁵ <https://www.centeronaddiction.org/addiction-research/reports/adolescent-substance-use>