

To Chairwoman Colleen Burton, Vice Chair Rene Plasencia, Minority Ranking Member Richard Stark, and members of Health & Human Services Committee.

I write to you today as the President of the National Association of Drug Diversion Investigators (NADDI), and as a former State of Florida sworn law enforcement officer with over 25 years of experience in the field of pharmaceutical drug investigations. NADDI is the premier law enforcement organization in the United States providing cooperative education and training in the specifics of pharmaceutical drug diversion, investigation, prosecution and prevention. We operate nationally with over 4,500 members, of which over 2,000 are active duty law enforcement. NADDI chapters operate in 32 state and regional chapters around the country.

NADDI is concerned about proposed legislation in Florida and across the nation to facilitate Canadian Prescription Drug Importation Programs. Proposals to import medicine from outside the United States as a cost saving factor to Americans is a righteous mission. Unfortunately, a truly effective program with the necessary risk mitigation initiatives necessary to protect the supply chain and the health & safety of the American Public will cost abundantly more than we are currently paying.

This issue has been studied extensively in the past by both regulators and outside experts, and they all have come to the same conclusion: it will put patients and law enforcement at risk. We fully understand and sympathize with the concerns about affordability that drive regulators to look at extreme measures, and to think outside of our jurisdictional boundaries. However, law enforcement has seen, up close, the dangers of and costs associated with maintaining the integrity of the pharmaceutical supply chain and serious faults within our current regulatory structure. Law enforcement is currently engaged in an overwhelming battle to protect our citizens from misbranded, adulterated, and contaminated pharmaceutical drugs that pose a grave danger to their colleagues, patients and the community; opening jurisdictional boundaries in this manner will be reckless and ill-advised.

If we set aside the cost of implementing the proposed program as a cost saving initiative, we're left with calculating the cost of necessary support services to effectively manage, monitor, investigate, and enforce the overwhelming violations that will come. Considering that the majority of the enforcement efforts both regulatory and law enforcement MUST come from federal resources since many of the proposed partners are outside of the State of Florida jurisdiction, we can't honestly say that they will be willing and able to respond to the fallout we create.

The State of Florida was faced with a similar problem over a decade ago, when we were identified as "The Pill Capital of our Nation" and ground zero for overdose deaths. As controlled substances were illegally promoted, distributed, and adulterated throughout Florida our regulatory agencies took over a decade to develop a plan of action. As a result, overdoses ran rampant across the State of Florida and the US; hundreds of thousands died during that time frame. The same regulatory agencies you propose to handle this initiative sat silently as the problem grew; they lacked the necessary law enforcement powers to be effective then, as they do now, and federal resources were few and far away, and we still have not recovered.

Should Florida enter into the proposed plan of a Drug Importation Program without stringent risk mitigation efforts in place by our administration, regulatory partners, and state & federal law enforcement agencies, we will see a significant increase in drug adulteration, cargo thefts, organized fraud initiatives and threats to the health & safety of the American Public we claim to protect.

Florida HB 19 is a smoke and mirrors approach to implement a fairy tale proposition that will ultimately end up costing the citizens of Florida more than it will save.

The issues of access to medicine are real and concerning. However, we want to urge you to seek the safest way possible to address them. As you proceed in considering policy solutions in this area, we are happy to share with you our experiences and information about the dangers we've seen.

Sincerely,

Lisa McElhaney, President

National Association of Drug Diversion Investigators

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