MEMORANDUM

Date: February 17, 2022

To: The Honorable Chair and Members
From: Jan Lesher, Acting County Administrator

Pima County Board of Supervisors

Re: Current Efforts to Respond to Fentanyl Misuse in Pima County

As is the case across the country, opioid related deaths continue to rise in Pima County. Per the Medical Examiner’s most recent estimates, opioids in general (including fentanyl) contributed to 71 percent of the 498 overdose deaths in this community. The Board of Supervisors has historically received information about our efforts in this complicated area (August 29, 2017, November 20, 2017 & September 13, 2018) and today I want to share some important updates provided by the directors of Public Health and Behavioral Health.

In her memorandum Dr. Cullen summarizes the critical fentanyl overdose prevention and education efforts by the Community Mental Health and Addiction (CMHA) team. (Attachment 1) During the last three years this team has developed a sophisticated surveillance and analysis system funded with Centers for Disease Control and Prevention (CDC) resources and involving multiple state and local collaborators. Using current data, they are able to issue timely alerts to local clinicians, social service agencies and the general public regarding current spikes and trends in opioid overdoses, as well as communicating the most current overdose prevention recommendations and educational messaging.

This same CMHA team is responsible for the inventory and coordination of targeted Narcan distribution throughout Pima County. Providing Narcan to local law enforcement, first responders, behavioral health agencies serving those at highest risk in our community, and other interested partners and coalitions. Through these efforts, Narcan is now available at public libraries, outpatient clinics, and other venues.

In an effort to combat the increase in drug overdose deaths driven by fentanyl, the Department of Health and Human Services announced approval for federal funding to purchase rapid Fentanyl Test Strips (FTS) on April 7, 2021. On May 18, 2021, Arizona Senate Bill 1486 was passed which amended A.R. S. § 13-3415 to decriminalize their use in this state. The CMHA team will begin providing FTS to local organizations and agencies that work with target populations, in tandem with its Narcan distribution efforts.

In a separate memorandum, Director Perrera, details an important achievement in our efforts to address substance misuse impacting the detainees. (Attachment 2) On February 7, 2022 Behavioral Health and the Pima County Adult Detention Center (PCADC), with considerable assistance from our contracted medical vendor, were awarded an Opioid Treatment Program Certification by the federal Substance Abuse and Mental Health Services Administration. This certification allows detainees in the Sheriff’s custody to receive the full array of medically
assisted treatment (MAT) for Opioid Use Disorder under the supervision of our medical contractor. The speed with which this licensure was obtained is remarkable and is a testament to work and competence of the Behavioral Health Department and our medical services provider (Naphcare).

Historically, a range of MAT services have been delivered at PCADC with the concurrence of the Sheriff, since 2017. At that time, we became one of the first county detention facilities in the country to offer MAT to opioid involved pregnant detainees. Subsequently, MAT services were expanded under a prior contractor (Centurion) to deliver treatment to incoming detainees already under treatment with a community treatment provider. We have however been entirely reliant on external treatment providers. The new certification allows greater control and flexibility in the administration and potential expansion of such programs and represents a significant milestone in serving opioid involved detainees.

Clinical treatment and harm reduction efforts are critical to prevent overdose deaths. Pima County will continue to build upon these important efforts as we look to respond meaningfully to what is a complex national substance misuse crisis that evades an easy or rapid solution.

JKL/fg

Attachments

c: The Honorable Sheriff Chris Nanos, Pima County Sheriff’s Department
Francisco García, MD, MPH, Deputy County Administrator & Chief Medical Officer, Health and Community Services
Carmine DeBonis, Jr., Deputy County Administrator for Public Works
Terry Cullen, MD, MS, Public Health Director, Health Department
Paula Perrera, Director, Behavioral Health
Greg Hess, MD, Chief Medical Examiner, Office of the Medical Examiners
Amber Mathewson, Director, Library District
MEMORANDUM

Date: February 9, 2022

To: Jan Lesher
Acting County Administrator

From: Theresa Cullen, MD, MS
Health Department Director

Re: Current Efforts Against Fentanyl Use and Deaths

This memo is in response to an information request regarding the Health Department’s current efforts to address the increase in fentanyl use and deaths, including harm reduction strategies. Specifically, the following efforts are summarized in detail below:

- Current Public Information and Outreach Efforts
- Youth-Targeted Interventions and Education
- Projects In Development
- Harm Reduction Strategies
  - Early Alert System
  - Fentanyl Test Strips

Public Awareness and Outreach Efforts

At this time, there are a variety of prevention and education efforts combatting fentanyl overdoses in our community. Over the past three years, several interviews have been conducted with the media and multiple alerts regarding fentanyl overdoses have been distributed within the community to notify the general public, providers, and local agencies. These alerts provide latest trends, educational messaging, and recommendations to prevent overdoses. We have also produced various awareness materials such as the “one pill can kill” poster. This poster describes risk factors, the danger associated with fentanyl, and the impact of this drug in Pima County.

In addition to health alerts and media campaigns, the CMHA team is responsible for the inventory and coordination of targeted Narcan distribution throughout Pima County. We coordinate to provide Narcan to local law enforcement, first responders, behavioral health agencies, and local coalitions allowing them to provide Narcan to those at highest risk of overdose in our community. In addition to these partnerships, Narcan is distributed directly out of our public libraries, outpatient clinics, and the adult detention center. Lastly, in response to the increase in teen deaths due to fentanyl in early 2021, the Health Department increased Narcan distribution by approximately 500% to blanket the community with this life saving intervention. Following these efforts, the number of fatal fentanyl overdoses observed in the teen population decreased by 66.67%, as seen in the chart below.
Youth-Targeted Interventions and Education

Recently, a fentanyl warning letter was developed to educate parents, educators, and students about the risks associated with fentanyl and how to seek help. The letter was distributed across all school districts in partnership with the Pima County Superintendent’s Office. We also partnered with multiple local stakeholders to develop a community-wide fentanyl presentation targeting teens and young adults. The presentation is designed to be used as a standardized educational tool shared by all the participating agencies, to ensure consistent messaging is used across the community. In addition, various evidence-based curriculums such as Rx360, Strengthening Families Program, and Youth Mental Health First Aid are presented at local schools to educate students, and the adults that care for them, about substance use and to promote resiliency.

Projects In Development

Early Alert System

An early alert system is in development in tandem with various law enforcement agencies integrating overdose and drug seizure data. This will enable a process for early public notifications whenever high levels of fentanyl is suspected to be circulating in the community, making the drug more accessible and increasing exposure to those at risk of overdose. In doing so, this early notification system will improve the timeliness of public advisories and targeted outreach efforts to prevent overdoses.

*Pending confirmation due to data lag with death certificate process.*
Fentanyl Test Strips

In an effort to combat the increase in drug overdose death driven by strong synthetic opioids, such as fentanyl, the Department of Health and Human Services announced approval for federal funding to purchase rapid Fentanyl Test Strips (FTS) (pictured below) on April 7, 2021. FTS can be used to detect the presence of fentanyl in urine and drug samples that have been dissolved in water. As part of the Overdose Data to Action (OD2A) grant from the Centers for Disease Control and Prevention (CDC), recipients are permitted to spend up to $100,000 per year to purchase FTS to support surveillance and prevention strategies. The CDC has also highlighted the effective use of FTS as a harm reduction strategy for individuals at risk of an opioid overdose, as well as enhanced surveillance of illicit drug supply in local areas to inform prevention strategies and public health messaging.

Image 1. Unused Fentanyl Test Strip (FTS)

In Arizona, FTS were previously classified as drug paraphernalia, when not in a clinical setting, under A.R.S. §13-3415. On May 18, 2021, Arizona Senate Bill 1486 was passed which amended aforementioned A.R.S. §13-3415 for FTS to no longer be considered drug paraphernalia. “Testing equipment used, intended for use or designed for use in identifying or analyzing the strength, effectiveness or purity of drugs, other than narcotic drug testing products that are used to determine whether a controlled substance contains fentanyl or a fentanyl analog.” This amendment was championed by Senator Christine Marsh, whose son accidentally overdosed on a fentanyl-laced pill in 2020, in efforts to prevent accidental overdoses.

Current proposed strategies for distribution include the following:

1. **Harm Reduction**: The health department has planned efforts to distribute FTS as a harm reduction strategy and to improve clinical screenings for surveillance and early intervention. The simultaneous distribution of Narcan and FTS directly to people who use drugs will have a direct impact on reducing overdoses in the community. This practice provides individuals with timely information which empowers them to make safer choices.

2. **Clinical Screening**: By distributing to local clinics and agencies, FTS will help treatment teams identify fentanyl use to provide education and to effectively modify treatment plans. Clinical screenings will also bolster tracking efforts at the clinic level to better understand the frequency of fentanyl use in their patient populations.

The Health Department will be responsible for storage and distribution of FTS, but will not have a direct role in testing or clinical screenings. As such, Health Department staff will **NOT** be testing drugs, assisting others in testing drugs, or engaging in any activities that involve the
presence of drugs. Pima County will be providing FTS to local organizations and agencies that work with target populations, in tandem with Narcan distribution.

With professional support (clinical screenings) and individual awareness (harm reduction), we can help prevent overdoses through early intervention and rapid response strategies.

**Media Campaigns**

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*The last thing they did before they died.*

Fentanyl was responsible for the deaths of 193 adults and 12 teens in Pima County last year.

**One pill can kill.**

Fentanyl is a synthetic opioid. It is 50-100 times more toxic than heroin and has contributed to 2.5 times as many deaths. Fentanyl is regularly found in cocaine, meth, heroin, pills, and powders in our community.

Be safe. Don’t take it.

For free fentanyl test strips or naloxone, visit PimaHelpline.org/Naloxone.

For substance use treatment call 1-888-662-HELP (4357).

Community Mental Health & Addiction Program: pima.gov/MentalHealth

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*Lo último que hicieron antes de morir.*

En el Condado Pima, el fentanilo fue responsable por la muerte de 193 adultos y 12 adolescentes el año pasado.

**Una pastilla puede matar.**

El fentanilo es un opioide sintético. Es 50 a 100 veces más tóxico que la heroína y ha contribuido a más de doble de muertes. El fentanilo se ha encontrado en la cocaína, metanfetamina, heroína, pastillas y polvos en nuestra comunidad.

La única manera de estar a salvo es no usarlo.

Para obtener naloxona o tiras para detección de fentanilo gratis visita PimaHelpline.org/Naloxone.

Para tratamiento de adicciones llama al 1-888-662-HELP (4357).

Equipo Comunitario de Salud Mental y Adicciones: pima.gov/SaludMental
Concur:

Francisco Garcia, Deputy County Administrator

Date: 9 Feb 2022
MEMORANDUM

Date: February 15, 2022
From: Paula Perrera  
Behavioral Health Director

To: Jan Lesher  
Acting County Administrator

Re: PCADC MAT Services Update

On October 21, 2021 I sent a memo to the County Administrator describing the history and challenges of providing Medically Assisted Treatment (MAT) services to individuals with Opioid Use Disorder (OUD) in the Pima County Adult Detention Complex (PCADC) and requested authorization to pursue an Opioid Treatment Provider License (OTP).

Since October, MAT services in the Pima County Adult Detention Center have successfully transitioned from Community Medical Services (CMS) to our contracted medical services vendor, Naphcare, without any additional adverse events arising from the program. Naphcare’s Medical Director, Dr. Jeffrey Alvarez, immediately began the process of obtaining the necessary approvals from the Drug Enforcement Agency (DEA) and the Substance Abuse and Mental Health Services Administration (SAMHSA). Historically, it has taken at least two years to obtain such approvals from these agencies for jail settings. I am pleased to report that Pima County obtained a provisional license from SAMHSA on February 7, 2022, approximately four months from initiation of the process. The National Commission on Correctional Health Care (NCCHC), the entity that accredits the services in our jail, is also accepted by SAMHSA to provide the survey of our MAT program to obtain full licensure. We anticipate receiving that survey by NCCHC in the next four months.

From January, 2021 to February 2, 2022, there have been twenty-six emergency room send outs from PCADC related to possible overdose or ingestion of narcotics. In twenty-two of the cases, Narcan was administered. Nineteen of the twenty-two Narcan administrations required multiple doses to obtain effect. Unfortunately, four of the twenty-six cases expired; the cause of death for three is Fentanyl intoxication and the fourth is still pending but likely the same.

During the month of January, 2022, the suspected overdoses have required increasing doses of Narcan to elicit a response. One patient required nine doses. In an effort to reduce the number of doses required to elicit a response, Naphcare is transitioning from the standard 4 mg Narcan product to an 8 mg product, Kloxxado. We have shared this information with PCADC administration and understand that they intend to provide Kloxxado to their custody officers as well.

It is important to note that CMS, citing a nursing shortage, abruptly discontinued providing methadone for Naphcare to administer on December 1, 2021. This action caused some detainees, who were receiving relatively high doses of methadone, to undergo a detox protocol that may not have been the preferred method for treating their OUD. We speculate that the lack of methadone as a treatment option may be a contributing factor for some of the over doses within the jail population. It is our hope that with our new ability to order, prescribe and administer methadone we will see improved patient outcomes and fewer over doses.

Concur:  

Francisco Garcia, Deputy County Administrator &  
Chief Medical Officer

Date: 15 Feb 2022

Attachments: Letter from SAMHSA (2/7/22) & Provisional License (AZ-10142-M)

Cc: Sheriff Chris Nanos, Pima County Sheriff’s Department
February 07, 2022
Jeffrey Alvarez (Sponsor)  
5711 West Robb Lane  
Glendale, AZ 85310

Pima County Adult Detention Center  
1270 WEST SILVERLAKE ROAD  
TUCSON, AZ 85713

Re: OTP No. AZ10142M, DEA No. RP0617348
Dear Jeffrey Alvarez:
This is in reference to your Application for Certification to Use Opioid Drugs in a Treatment Program Under 42 CFR § 8.11 (SMA-162) dated October 08, 2021. Also, please refer to your submission regarding your application to the National Commission on Correctional Health Care, a Substance Abuse and Mental Health Services Administration (SAMHSA)-approved accreditation body. SAMHSA has completed processing your application for provisional certification. Pursuant to 42 CFR § 8.11(e), you are hereby granted provisional certification.
Under the terms of provisional certification, you are authorized to use opioid drugs for maintenance and/or detoxification treatment of narcotic addiction at the above referenced location. Please note that methadone, Subutex®, Suboxone®, and FDA-approved generic buprenorphine addiction products are the only narcotic drugs approved for the treatment of narcotic addiction in opioid treatment programs (OTPs). The relocation of your primary dispensing location (listed above) requires the submission of an amendment to your program application, and advance approval from SAMHSA for the relocation. Please note that your provisional certification will expire February 07, 2023.
The Federal opioid treatment standards set forth under 42 CFR § 8.12 reflect the requirements necessary to determine the Federal qualifications for professional practice in the medical treatment of opiate addiction with opioid treatment medications. Since your State Authority and the Drug Enforcement Administration (DEA) standards and regulations may vary, this approval does not abrogate any restrictions imposed by your State Authority or DEA.
Please include the above OTP number in any correspondence concerning your application.

Sincerely,

Ingvild K. Olsen, MD, MPH

Ingvild K. Olsen, MD, MPH
Acting Director
Center for Substance Abuse Treatment
Substance Abuse and Mental Health Services Administration

cc: DEA
State Opioid Treatment Authority
National Commission on Correctional Health Care
Jasmine Quailey, CSAT
Attachment: Certification Certificate
OPIOID TREATMENT PROGRAM CERTIFICATION

Substance Abuse and Mental Health Services Administration
Center for Substance Abuse Treatment
Rockville, MD 20857

OTP NUMBER
AZ-10142-M

EXPIRATION DATE
2/7/2023

Pima County Adult Detention Center
DBA: Pima County Behavioral Health OTP
1270 WEST SILVERLAKE ROAD
TUCSON, AZ 85713

This certificate is issued under authority of 42 CFR § 8.11 (21 U.S.C. 823(g)(1))

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Substance Abuse and Mental Health Services Administration
Center for Substance Abuse Treatment
www.samhsa.gov

Yngvild K. Olsen, MD, MPH
Acting Director
Center for Substance Abuse Treatment
Substance Abuse and Mental Health Services Administration

THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, BUSINESS ACTIVITY OR VALID AFTER EXPIRATION DATE