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Director and State Public Health Officer  
California Department of Public Health (CDPH)  
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**Re: SB 43 (Hill): Antimicrobial Resistance (Oppose Unless Amended)**

Dear Dr. Smith:

The California Conference of Local Health Officers (CCLHO) voted at the CCLHO Board meeting on March 2, 2017 to take an Oppose Unless Amended recommendation on SB 43 (Hill), a bill that would require the following: reporting of deaths related to antimicrobial resistance, the annual submission of antibiograms by acute care hospitals and clinical laboratories, and the publication of an annual report regarding antimicrobial resistance by CDPH.

CCLHO recommends a position of Oppose Unless Amended due to the following concerns with the bill:

- The current ICD-10 coding system does not include codes for antimicrobial resistant infections, thereby limiting the ability to accurately record antimicrobial resistant infections on death certificates.
- Due to documented issues with the accuracy/reliability of diagnoses on death certificates, requiring the reporting of antimicrobial resistance on death certificates may not result in helpful data to assess antimicrobial resistance burden or trends.
- Delays exist in the submission of death certificate data through the National Healthcare Safety Network (NHSN) so that death certificate data do not enable real-time investigation.
- While the proposed CDPH report could help CDPH and local health departments monitor antimicrobial resistance spread and burden of infection, most antimicrobial infections are not reportable and the bill does not require reporting of antimicrobial resistant infections (only death reporting), thus not all reporting requirements for CDPH may be feasible.
- The bill requirements focus widely on all antimicrobial infections/organisms, and these are of variable public health importance. For those antimicrobial infections with public health significance, other reporting mechanisms may be more appropriate, such as Title 17 regulations.

CCLHO recognizes that antimicrobial resistance leads to significant avoidable morbidity, mortality, and cost. However, for the reasons noted above, CCLHO recommends Oppose Unless Amended to remove the requirement to report antimicrobial infections on death certificates and to narrow the reporting requirements to only include those organisms with public health significance.

As you are aware, CCLHO was established in statute in 1947 to advise the California Department of Health Services (now the California Department of Public Health), other departments, boards, and commissions, as well as officials of federal, state and local agencies, the Legislature and other organizations on all matters affecting health. CCLHO membership consists of all legally appointed physician health officers in California's 61 city and county jurisdictions.

This position of Oppose Unless Amended is consistent with CCLHO's strategic priorities of taking a leadership role in the practice of public health and policy development, and providing advice and scientific expertise on public health matters.

If you have any questions, please feel free to contact me at [Ken.Cutler@co.nevada.ca.us](mailto:Ken.Cutler@co.nevada.ca.us) or at 530-265-7154.

Sincerely and on behalf of the CCLHO membership,

*Original signed by Dr. Ken Cutler*

Ken Cutler, MD, MPH  
President, California Conference of Local Health Officers