The Infectious Diseases Society of America, representing over 10,000 infectious disease physicians and scientists welcomes this opportunity to offer you comments on antibiotic resistance.

The Interagency Task Force on Antimicrobial Resistance (ITFAR) was established to help coordinate the federal response to resistance. But the ITFAR needs high-level, centralized leadership and dedicated funding. IDSA calls for an ITFAR Director to be appointed in the Department of Health and Human Services and an ITFAR advisory board of non-government experts to be established.

The European Union is far ahead of the US in encouraging antibiotic innovation. The EU has launched an impressive public private partnership, New Drugs for Bad Bugs, which brings together government, academia, and industry for an unprecedented collaboration. IDSA urges the US government to establish a complementary effort.

IDSA also recommends a new tax credit to support antibiotic R&D. Analysis by Ernst & Young found that this proposal would yield an additional 5-7 new drugs in the pipeline every year.

IDSA urges establishment of a Limited Population Antibacterial Drug (LPAD) pathway, very similar to the Special Medical Use pathway that PCAST has recommended. LPAD would allow new antibiotics to treat serious or life-threatening infections for which there is an unmet medical need to be studied in smaller, more rapid clinical trials. LPAD drugs would be approved for use in the limited population for whom they were proven to be safe and effective, and labeled and monitored to help ensure their appropriate use.

As we stimulate more antibiotic R&D, we must also combat resistance through research public health activities. IDSA supports the new National Institute for Allergy and Infectious Diseases (NIAID) Clinical Research Network on Antibacterial Resistance and recommends it be allocated $100 million annually.

Real time, publicly available data on antibiotic resistance and antibiotic use are critical. IDSA supports CDC’s new antibiotic resistance initiative (as proposed in the President’s Budget) to improve surveillance and additional funding for the National Healthcare Safety Network to help expand reporting of antibiotic resistance and antibiotic use data.

Antibiotic stewardship is a critical tool to protect antibiotics from the misuse and overuse that drive resistance, improve patient outcomes and lower healthcare costs. IDSA recommends that all healthcare facilities be required to implement an antibiotic stewardship program as a Medicare condition of participation.

New diagnostic tools are also crucial for combating resistance. Diagnostic tests help guide appropriate use of antibiotics by lessening the need for clinicians to treat patients empirically. IDSA recommends increasing funding for diagnostics research, reducing regulatory barriers to diagnostics R&D, ensuring appropriate levels of reimbursement for diagnostic, and educating healthcare providers about the utility of diagnostic tests.

Lastly, IDSA supports eliminating inappropriate uses of antibiotics in food-producing animals and other aspects of agriculture.

Again, IDSA thanks you for this opportunity to provide comments and for your work on the issue of antibiotic resistance.