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June 17, 2010

Secretary Kathleen Sebelius
Office of the Secretary
U.S. Department of Health and Human Services
200 Independence Ave, SW
Washington, DC 20201

Dear Secretary Sebelius,

On behalf of the Infectious Diseases Society of America (IDSAs), which is comprised of more than 9,000 infectious diseases physicians and scientists, I would like to thank the U.S. Department of Health and Human Services for hosting a Listening Session for the Trans-Atlantic Task Force on Antimicrobial Resistance (TATFAR). IDSAs appreciates the opportunity to provide comments and looks forward to future opportunities for dialogue with the members of the Task Force.

Upon learning about the Declaration made at the U.S./European Union summit in November 2009 to address the critical problem of Antimicrobial Resistance, IDSAs sent a [letter](#) to President Obama and Prime Minister Reinfeldt applauding the creation of the Trans-Atlantic Task Force on Antimicrobial Resistance. Because of the increasing number of multi-antibacterial drug-resistant infections worldwide, the creation of the Task Force comes at a critical time in public health.

In the letter to President Obama and Prime Minister Reinfeldt, IDSAs referenced two reports. The first is an IDSAs Report titled "[Bad Bugs, No Drugs, No ESKAPE!](#)" which was published in the journal *Clinical Infectious Diseases*, and the second is an European Centre for Disease Prevention and Control (ECDC) and European Medicines Agency (EMA) Joint Technical Report titled "[The Bacterial Challenge: Time to React](#)." Both reports highlight the unfortunate reality that there are few antibacterial drugs in the development pipeline to treat infections due to highly-drug-resistant bacteria. The magnitude of this problem requires a global solution.

As such, IDSAs has outlined a solution in the form of a global commitment to the development of new antibacterial drugs called the [10 x '20 initiative](#). The *10 x '20 initiative* is essentially a call to action—one that calls for the development of 10 novel antibacterial drugs by the year 2020. A commitment this significant will only achieve success if that commitment is global and includes participants from all areas—federal partners, political leaders, private industry, academia (such as the Trans-Atlantic Task Force). Several [organizations](#) have made that commitment by endorsing the *10 x '20 initiative* in an effort to ensure that the pipeline issue receives the attention it so desperately needs.

Page Two – Letter to Secretary Sebelius on Trans-Atlantic Task Force on Antimicrobial Resistance

In the letter to President Obama and Prime Minister Reinfeldt, IDSA requested that global leaders on the Task Force take all of the necessary actions to ensure that 10 new antibacterial drugs be brought to market by 2020 and that the Task Force be composed in a way that allows for the *10 x '20 initiative* to become a reality. IDSA also outlined a 9-point vision for an Antibacterial Drug Pipeline Work Group within the Task Force, which includes engagement, function and representation strategies for a broad spectrum of policy options to address the diminishing pipeline issue. There is also a recent [analysis](#) on financial incentives that has the potential to inform how the Task Force moves forward.

Ten new antibiotics by 2020 may seem like a large endeavor, but its scope is appropriate when one considers the severity of the problem and the moral imperative incumbent upon all of us to make sure this effort achieves success. IDSA also recognizes the great importance of promoting appropriate antimicrobial use and infection prevention measures. It is critical that antimicrobial resistance be addressed using a multitude of approaches, and that the Task Force determines those approaches in an inclusive and transparent manner.

It is on that note, that IDSA must express some disappointment in the manner in which the first Task Force meeting has been convened as well as in the Task Force's composition. Specifically, we have concerns that the Task Force meeting is closed to the public and that there is seemingly no mechanism—other than the Listening Session—for the public to provide comment or participate in an open dialogue with the Trans-Atlantic Task Force in an effective, efficient manner.

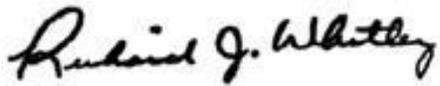
While these issues may be the result of the Task Force having not yet established a formal structure, IDSA has learned there is currently no formal “head” of the Task Force, nor does the Task Force include any non-government officials or experts. There is no outside advisory group, which seems to mirror the structure of the U.S. Interagency Task Force on Antimicrobial Resistance, which is problematic because, to date, there have been inadequate coordination of U.S. efforts and minimal opportunities for dialogue between the members and outside experts.

On behalf of IDSA, I would like to express appreciation that the Task Force is finally meeting, but implore you to consider ways to ensure public input, transparent information exchange with outside experts and a robust commitment to tackle the issues of resistance and antibacterial drug development. This is too important an opportunity to miss.

Page Three – Letter to Secretary Sebelius on Trans-Atlantic Task Force on Antimicrobial Resistance

IDSA stands ready and willing to work with the Task Force's members in guiding the discussion on antimicrobial resistance. Please contact Leslie McGorman, MPPA, IDSA's program officer for public health, at lmcgorman@idsociety.org or by phone at 703-299-0015 should you have any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "Richard J. Whitley". The signature is written in a cursive style with a large initial 'R'.

Richard Whitley, MD, FIDSA
President