

From: [Ashley Charzuk](#)
To: [Apodaca, Sheila, DOH](#)
Subject: [EXTERNAL] 7.4.6 Public Comment
Date: Wednesday, August 17, 2022 1:38:12 PM
Attachments: [Safer Smoking Proposal.pdf](#)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

To Whom It May Concern,

Thank you for the opportunity to comment on 7.4.6. My name is Ashley Charzuk and I am the Executive Director of New Mexico Harm Reduction Collaborative inc. We operate primarily in Albuquerque, working with populations that use illicit substances. NMHRC provides supplies such as sterile syringes, all works needed for safe injection, as well as overdose prevention elements like Nasal Narcan and Naloxone.

I would like to raise concerns regarding our current inability as Harm Reduction Providers to offer some of the most powerful tools in combating communicable disease and overdose. Elements such as glass pipes, uncoated/cured foil, and other smoking/snorting elements have shown to increase engagement with overdose prevention programs while also providing a safer route of administration for substance users. regarding [the new changes in harm reduction regulation](#):

1. [We are ecstatic to be able to distribute Fentanyl Test Strips to our participants, however, it is not enough to make the mark on overdose numbers that New Mexico desperately needs.](#)
2. [I am in strong support of passing regulations that would allow Harm Reduction Programs to distribute glass pipes and cured foil as smoking proves to allow for substance users to gauge their level of use and discontinue before an overdose can occur.](#)

In summary, [I thank you for taking the time to consider my comments and the comments of my colleagues, as we work to provide supplies that the general public may not always understand, but are necessary to promote health and safety among 1 in 5 New Mexicans](#). Please see below for additional details and pertinent literature.

University of Washington - Safer Smoking Increases Engagement and Safety
<https://adai.uw.edu/safer-smoking/>

Access to Safer Smoking Materials Reduce Injection Drug Use
<https://pubmed.ncbi.nlm.nih.gov/18502378/>

I have also attached a proposal I worked on recently for Healthcare for the Homeless to convince their senior management and board to allow for their Harm Reduction Department to purchase Safer Smoking elements if the regulations would allow for them to do so.

Sincerely,

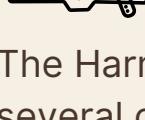
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Albuquerque
HEALTHCARE
for the homeless

Providing Safer Smoking Supplies for AHCH Clients

A Proposal by the Harm Reduction and Outreach Team



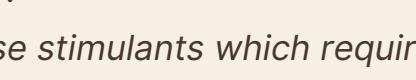
Research and Collaboration

The Harm Reduction and Outreach Team reached out to several other Harm Reduction Organizations locally, and across the country in order to put together this presentation, as we truly believe that Safer Smoking items are an engagement tool and gateway to more comprehensive harm and risk reduction for our clients.

These organizations include:

- Smokeworks Boston (non profit org dedicated to providing Safer Smoking tools to other orgs via Mutual Aid)
- National Harm Reduction Coalition (NYC)
- CORE (Eugene, OR)
- Freewheel Mobile Aid (Albuquerque, NM)
- SHOTS (Tulsa, OK)

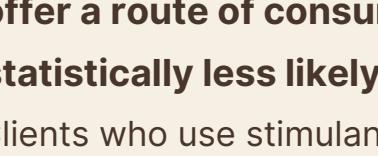
Why Should We Allocate Funding Toward Injection Alternatives?



- **Demographics Are Changing:** One in Ten New Mexicans meets the diagnostic criteria for Substance Use Disorder.

68% of people with SUD in NM report that they use stimulants which require smoking elements such as pipes.

- **Injection Alternatives such as safer smoking tools provide an option to clients who:**
 - Do not wish to progress to injecting substances or Wish to reduce harm by discontinuing injection and moving to smoking
 - Prevent the spread of COVID-19, Flu, Rhinovirus, Hepatitis B and C
 - Want to regulate their use by utilizing a gradual intake method such as smoking - whereas injecting is a rapid intake method with no option to progressively discern how much of a substance the client can handle.



The Role of Injection Alternatives in Overdose Prevention

- **Safer Smoking Tools, such as glass pipes and Smoking Foil, offer a route of consumption that is slower, more deliberate, and statistically less likely to lead to accidental overdose.**
- Clients who use stimulants or prefer smoking only do not normally engage with Harm Reduction Orgs. Other Organizations who have begun providing these services report that **78% of Stimulant Only users request Narcan during engagement.** (source: SmokeWorks Boston 2022 Mutual Aid Organizations Survey)
- Clients who would have normally preferred to smoke substances but do not have access to Safer Smoking Elements often report it is easier to access syringes and therefore are more likely to experience accidental overdose.

As of 04/11/22 Kobo Data for AHCH HRO Dept shows that various forms of Safer Smoking tools have been requested on 96% of Outreaches and SSPs.

This means clients request pipes or foil MORE than socks or underwear combined.

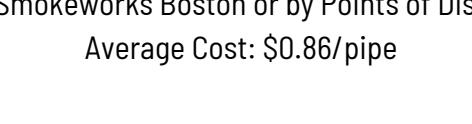
Other Programs that began providing Injection Alternative Items to their clients report:

- Increased access to HIV and Hepatitis C Testing programs, access to more comprehensive medical care, behavioral health care, housing resources, other social programs, and more.
 - *HCH currently caters most programs to IV Drug users and, more specifically, opioid users. Stimulant users report needing many of the same services but not having a direct outlet to help refer them to or assist them with location of said services.*
 - **This would mean an overall increase in client interaction, and meeting the needs of a new demographic of clients that have formerly been unattended to.**

What Injection Alternatives Could HCH Provide to Harm Reduction Participants?

Disclaimer: These items are sold by many distributors and are easily accessible, these are just some suggested distributors who offer these items specifically to Harm Reduction Agencies.

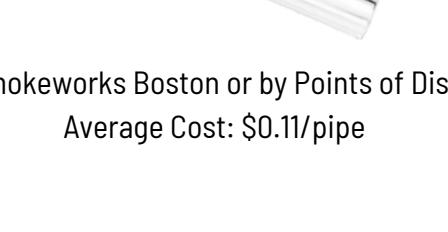
Hammer Pipes



Sold by Smokeworks Boston or by Points of Distribution

Average Cost: \$0.86/pipe

Oil Burner Pipes



Sold by Smokeworks Boston or by Points of Distribution

Average Cost: \$0.11/pipe

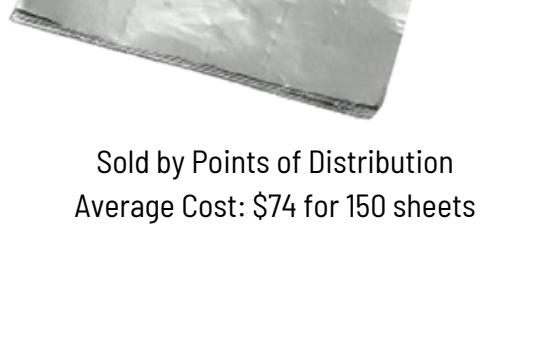
Stem Pipes



Sold by Smokeworks Boston or by Points of Distribution

Average Cost: \$0.08/pipe

Smoking Foil



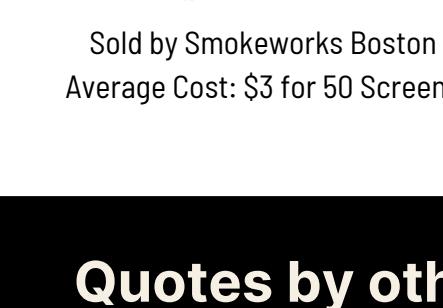
Sold by Points of Distribution

Average Cost: \$74 for 150 sheets

Sold by Smokeworks Boston

Average Cost: \$3 for 50 Screens

Screens



Quotes by other Harm Reduction Agencies After the Decision to Provide Injection Alternatives

(Provided by Jim Duffy of Smokeworks Boston)

"Pipes were the resource we didn't know we needed. We've gained so many participants that thought we didn't have anything for them because they don't shoot. Pipes are a symbol of good faith that show that we truly have everyone's best interests at heart."

- Hannah Fields, Director at SHOTS in Tulsa, OK

"When we started giving out pipes, the foot traffic into our program exploded overnight. Suddenly, folks using stimulants were engaging with us. We've been able to distribute hundreds of narcan kits and fentanyl test strips to participants that would have never come in for help with overdose prevention, HIV testing, or even general help with navigation services."

"Because we distribute pipes, we've been able to closely engage with people who use drugs who have never received health services before. We have been able to test more people for infectious diseases"

- Both Quotes: Jesse Pack, BAMSI

"Providing pipes has allowed us to reach a more diverse group of drug users. There is a huge population of "smokers" that we were missing because they "didn't need/use needles." By providing pipes more smokers are seeing that we can provide healthcare and important testing opportunities to them. 78% of people who come in for pipes only ALSO leave with Narcan"

- Kellene Mulcahy NHHRC