

## **Michael Botticelli Nomination Hearing**

### **Questions for the Record from Ranking Member Charles E. Grassley**

#### **1. Obama Administration Mixed Messages on Marijuana**

Earlier this year President Obama stated he thought recreational use of marijuana was merely a “bad habit” that was no more dangerous than consuming alcohol. He also indicated that he thought that it was “important” for the legalization of recreational marijuana under state law in Colorado and Washington to “go forward.” Attorney General Holder has also recently stated that he’s “cautiously optimistic” about the legalization of recreational marijuana in those states. Finally, the President recently installed an advocate for legalization of recreational marijuana, Vanita Gupta, as acting Assistant Attorney General for Civil Rights.

- a. Do you think these comments and actions by prominent figures such as the President and the Attorney General have contributed to the recent well-documented reduction in the perception of risk related to recreational marijuana use among young people?

**ANSWER:** The perception amongst youth of the harmfulness of marijuana has been steadily declining since 2005, according to two widely recognized national surveys, the Monitoring the Future survey supported by the National Institute on Drug Abuse (NIDA) and the National Survey on Drug Use and Health from the Substance Abuse and Mental Health Services Administration.

- b. If confirmed as head of ONDCP, what specific steps will you take to help reverse this reduction in the perception of risk?

**ANSWER:** I will work to bolster our prevention efforts through our Drug Free Communities (DFC) Support Program and through the High Intensity Drug Trafficking Areas (HIDTA) program.

ONDCP funds the DFC Support Program, a powerful tool supporting drug prevention efforts in communities nationwide. The program currently provides grants to approximately 680 local drug-free community coalitions, enabling them to increase collaboration among community partners, including local youth, parent, business, religious, civic, law enforcement, and other groups, to prevent and reduce youth substance use, including marijuana use.

DFC coalitions across the country have identified marijuana as a significant problem in their communities. Nearly 90 percent of Fiscal Year (FY) 2013 DFC coalitions list marijuana as one of their top five targeted substances, and are taking action to prevent young people from using

the drug.<sup>1</sup> These coalitions employ a host of prevention strategies, including disseminating multi-lingual educational materials, hosting drug-free social events for youth, working with schools and educators to promote drug-free campuses, and working with local media to highlight prevention activities.

Evaluation data indicate that where DFC dollars are invested and coalitions operate, youth substance use is lower. Between 2002 and 2012, DFC communities have experienced reductions in use of alcohol, tobacco, and marijuana among both middle school and high school students. And in DFC communities, both middle and high school students' perception of parental disapproval of marijuana also increased significantly among all grantee cohorts.<sup>2</sup>

All of these results suggest that DFC community coalitions play a significant role in decreasing marijuana use and changing attitudes for the better among young people across the country.

ONDCP recently announced the FY 2014 DFC grants, including \$24.8 million in new grants to 197 communities and 3 new DFC Mentoring grants across the country. These awards join the \$59.1 million in DFC continuation grants released to 463 currently-funded DFC coalitions and 17 DFC Mentoring continuation coalitions.

ONDCP also administers the HIDTA program, which provides assistance to Federal, state, local, and tribal law enforcement agencies operating in areas determined to be critical drug trafficking regions of the United States.

Although the HIDTA program's primary mission is to dismantle and disrupt drug trafficking organizations, expanding prevention efforts offer HIDTAs the ability to address the drug threat in a community in a more balanced fashion. Currently, 22 HIDTAs, including all 5 Southwest Border HIDTA Regions, sponsor prevention activities. Nine HIDTAs specifically target marijuana, among other substances, in their prevention efforts.

## **2. Cannabidiol**

Last year, the Food and Drug Administration (FDA) approved clinical trials for Epidiolex, a highly-concentrated form of cannabidiol (CBD), for the treatment of rare forms of epilepsy. As you know, CBD is a non-psychoactive component of marijuana. Many people throughout the country and in Iowa, especially young children, are afflicted with severe cases of intractable epilepsy that anecdotal evidence suggests may be effectively treated with CBD. Research related to the potential medical benefits and risks associated with CBD could help determine whether this is so.

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<sup>1</sup> Unpublished Drug Free Communities Support Program Evaluation Tracking.

<sup>2</sup> [ibid.](#), pg. 19

- a. Do you support research into the potential benefits and risks associated with the administration of CBD to treat patients such as these?

ONDCP supports the efficient and scientific assessment of CBD in connection with potential new drug development and is supportive of FDA efforts, consistent with Federal Food, Drug, and Cosmetic Act and the Controlled Substances Act (CSA), to expeditiously provide safe and effective medicine to address urgent healthcare needs. It is important that the product be studied under appropriate protocols and submitted to the FDA in an IND application, so that there are assurances of the manufacturing quality of the drug.

In June 2014, FDA granted Fast-Track designation to the investigational CBD product Epidiolex being developed for the treatment of this rare form of childhood epilepsy. FDA has also authorized use of it as a part of an expanded access program, designed to facilitate the availability of investigational drug products to patients while those drugs are being studied for approval. According to the drug manufacturer, there are now 21 active expanded access INDs for Epidiolex treating about 300 patients with epilepsy syndromes. Approximately 95 percent of these INDs are for patients between 1 and 17 years of age.

The Federal Government will continue to support research on how marijuana compounds such as CBD may be used safely and effectively as medicine.

- b. How can such research be carried out under the current legal and regulatory framework for approving drugs in the United States?

Marijuana contains compounds with the potential to provide new treatments for important diseases, and the Administration is facilitating scientifically rigorous investigations to learn more about potential therapeutic benefits.

The Department of Health and Human Services (HHS) has approved or supported several hundred research projects for marijuana and its constituent compounds and continues to encourage research in this area, including potential therapeutic benefits.

Research on the therapeutic effects of marijuana or its constituents is being supported by various Institutes of the National Institutes of Health, as related to their missions. NIDA is one of the main supporters of such research, particularly as it relates to the development of less or non-addictive treatments for pain or treatments for addiction.

To support additional research, in May the Drug Enforcement Administration (DEA) approved an increase in the Government's research quota from 21 kilograms to 650 kilograms this year in order to provide a continuous and uninterrupted supply of marijuana to support researchers approved by the Federal Government.

The Administration, through the FDA's Expanded Access Program, also supports access to investigational new drugs outside of a clinical trial by patients with serious or life-threatening conditions who do not meet the enrollment criteria for the trial. Recently, the manufacturer of the new investigational drug Epidiolex announced the availability of expanded access for the treatment of patients with epilepsy.

The Single Convention on Narcotic Drugs of 1961 is an international treaty to prohibit production and supply of specific drugs and of drugs with similar effects except under license for specific purposes, such as medical treatment and research. The Convention requires parties to establish a government agency to control cultivation of drugs such as cannabis.

In the United States, NIDA fulfills that function through a contract with the University of Mississippi to grow cannabis; this is the only legal source of cannabis for medical and research purposes in the United States under Federal law. NIDA supplies this marijuana for Federally and non-Federally funded research projects.

Until recently, research requests indicated a particular interest in studies involving THC, but there is growing interest in marijuana that contains CBD as well. To be responsive to this interest, NIDA has grown a crop of marijuana this year, which is currently being harvested and processed, with varying levels of THC and CBD to meet the demands of the research community. NIDA will continue to grow additional quantities of marijuana with varying THC and CBD levels as the needs require, with appropriate DEA approvals.

- c. Are there any legal or regulatory barriers to CBD research that you believe could be responsibly eliminated or changed in order to facilitate this research?

**ANSWER:** I welcome the opportunity to work with you and with relevant Federal agencies to identify ways to remove barriers and stimulate research on CBD.

### **3. Diversion of Marijuana from Colorado to Iowa**

The Cole Memorandum of August 2013 suggests that the Department of Justice will not seek to enforce the Controlled Substances Act in states that legalize recreational marijuana, except to enforce certain federal priorities, so long as those states implement effective regulatory schemes. Those priorities include the diversion of marijuana from Colorado to other states.

But in 2010, Colorado was the source state for 10% of all marijuana interdicted in Iowa. That number grew to 25% in 2011, and to 36% in 2012. This is all *before* legalization of recreational use there. In the words of Colorado's Attorney General, the state is becoming "a significant exporter of marijuana to the rest of the country."

- a. What steps can the Administration take to help protect Iowa from the increasing diversion of marijuana from Colorado to it and other states?

**ANSWER:** ONDCP is not an enforcement agency, but one of the eight enforcement priorities that the Deputy Attorney General describes as “particularly important to the federal government” in his August 29, 2013, memorandum is, “preventing the diversion of marijuana from states where it is legal under state law in some form to other states.”

As set forth in the Deputy Attorney General’s memorandum, DOJ expects that all jurisdictions that have enacted laws legalizing marijuana in some form will also establish strong and effective regulatory and enforcement systems to control the cultivation, distribution, sale, and possession of marijuana, and to protect against the harms identified in the memorandum. DOJ will use its limited prosecutorial resources to enforce the law in all states in a manner that most effectively addresses its enforcement priorities and ensures public health and safety.

The increase in cross border trafficking that you describe is a serious concern. In fact, the Rocky Mountain HIDTA has identified the diversion of marijuana from Colorado to other states, including Iowa, as an emerging threat and has contacted law enforcement partners in other states to request voluntary reporting of instances in which marijuana from Colorado was seized in their jurisdiction. In 2013, there were 288 Colorado marijuana interdiction seizures destined for other states, compared to 58 in 2008—a 397 percent increase. Of the 288 seizures in 2013, there were 40 different states destined to receive marijuana from Colorado.

Consistent with the mission of the National HIDTA program, the Rocky Mountain HIDTA focuses its efforts on dismantling or disrupting drug trafficking and money laundering organizations. The Rocky Mountain HIDTA identifies domestically-produced marijuana as a key area of concern. In Colorado, the Rocky Mountain HIDTA supports 13 task forces focusing on disrupting or dismantling drug trafficking organizations, including marijuana-trafficking organizations, in the most effective and efficient manner.

Working at the other end of this diversion activity, the Midwest HIDTA, which includes jurisdictions in Iowa, provides a coordinated strategy to identify, disrupt, and dismantle drug trafficking organizations. The Midwest HIDTA supports co-located Federal, state and local task forces and strives to work Federal level investigations and identified priority targets. These task forces typically work priority poly-drug organization cases.

The HIDTA Program has established a Domestic Highway Enforcement (DHE) Strategy, which provides funding and support to primarily State Police and State Highway Patrol interdiction efforts to enhance coordinated multi-jurisdictional law enforcement efforts on the Nation’s highways. One such DHE initiative is the Iowa Interdiction Support initiative. The Midwest HIDTA DHE strategy focuses on drug trafficking organizations, including those trafficking in Colorado-sourced marijuana.

In addition, the Iowa Division of Narcotics Enforcement (DNE) has received support from the Midwest HIDTA for use by the Iowa State Patrol and DNE for Domestic Highway Enforcement. The enhanced interdiction efforts have been very successful, with seizures of sizable quantities of controlled substances and bulk cash shipments. More importantly, the intelligence gathered has aided in further identifying drug trafficking organizations and has produced information in furtherance of conspiracy investigations.

The DNE also has numerous officers assigned to DEA and other Federal task forces to facilitate interdiction and other enforcement efforts that cross jurisdictional authorities. The goal in every investigation is to identify the source, location, and destination of the supply. Emphasis is placed on sharing of information and consulting data systems to determine if the target of the interdiction investigation is also a target or co-conspirator in some other existing case or investigation.

The DNE is a participant in all the HIDTA Task Forces operating within the state. The DNE has a network of agents and offices throughout the state that enhance communication and coordination with a wide variety of agencies on the federal, state, and local level. The agents work with the DEA, United States Attorneys, and local prosecutors on a regular basis.

b. If confirmed as head of ONDCP, what specific steps will you take to do so?

**ANSWER:** ONDCP is not an enforcement agency.

ONDCP will continue to lead interagency efforts to collect and analyze data to assess the public health and safety consequences of state legalization laws, including data on the effects on other states. I will also continue to robustly support the efforts of our HIDTAs and law enforcement agencies to prevent diversion to other states.

#### **4. U.N. Conventions on Narcotic Drugs**

As you know, the United States is a signatory of the U.N. Conventions on Narcotic Drugs, which limit the production, distribution, possession and use of narcotics, including marijuana, to scientific and medical purposes. However, in a March 2014 report, the International Narcotics Control Board concluded that the laws in Colorado and Washington legalizing recreational marijuana use were “not in conformity” with these treaties. Moreover, in October 2014, Ambassador William Brownfield, the Assistant Secretary of State for the Bureau of International Narcotics Control and Law Enforcement Affairs, outlined what he described as the “four pillars”

of U.S international drug policy. These pillars included advocating for a “flexible interpretation of the U.N. Conventions” and “tolerating different national drug policies.”<sup>3</sup>

- a. Do you believe the United States is currently in compliance with its treaty obligations outlined in the U.N. Conventions, despite the legalization of marijuana under the laws of various states? Why or why not?

**ANSWER:** While the consequences of legalization measures in four states are a serious concern, United States compliance with the Conventions has not changed. The United States is firmly committed to upholding our obligations under the three U.N. drug conventions, as well as working with international partners to promote the goals of those conventions. These conventions are the foundation of international cooperation for dealing with all aspects of the drug problem, and we support them unwaveringly.

We believe that the policies set forth in the UN Drug Conventions limiting access to controlled substances for medical and scientific purposes are sound, and based on valid health concerns. The United States has opposed efforts to alter the Conventions.

Under Federal law, marijuana remains a Schedule 1 drug, subject to a high level of control, with criminal penalties for its illegal distribution and sale. Per the requirements of the Conventions, as well as our domestic laws, the U.S. Government heavily emphasizes proactive enforcement of laws against drug production and trafficking, as well as related money laundering, violence, and other illegal activities that impact the safety of our citizens. We lead the world in efforts against international drug cartels wherever they operate, and have – with the strong support of the Congress over many years - provided training, technical assistance, and other aid to key partners around the world, especially in the Western Hemisphere to help them disrupt and dismantle these organizations.

The Federal Government has enforced and is enforcing Federal drug laws within existing resources and allows prosecutors appropriate discretion to prioritize cases. In the Memorandum from Deputy Attorney General Cole dated August 29, 2013, DOJ has articulated eight Federal enforcement priorities with respect to cannabis and is currently investigating and has prosecuted criminal enterprises involved in marijuana trafficking and violence in all areas of the country.

As the International Narcotics Control Board (INCB) has observed, the Conventions are highly respectful of domestic law, and each country’s unique circumstances affect how it implements its

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<sup>3</sup> The “four pillars” of U.S. international drug policy were described as: (1) respecting the existing U.N. Conventions; (2) accepting flexible interpretation of the U.N. Conventions; (3) tolerating different national drug policies; and (4) combating and resisting criminal organizations. See William R. Brownfield, Asst. Sec’y, Bureau of Int’l Narcotics and Law Enforcement Affairs, U.S. Dep’t of State, Briefing on Trends in Global Drug Policy (Oct. 9, 2014) (transcript available at <http://fpc.state.gov/232813.htm>).

Convention obligations. In particular, article 36 of the Single Convention acknowledges “constitutional limitations” as a constraint. The Conventions, as they have evolved in practice, show the capacity to permit variations in national law and policy. In the case of the United States, constitutional limitations are a major factor, given the interplay of Federal and state-level laws and authorities on drug control issues.

The Conventions also explicitly authorize countries to provide alternatives to prison for drug users and low-level drug-involved offenders. Thus for example, inherent in the Conventions is sufficient flexibility for countries like the United States to differentiate sentencing policy between significant drug traffickers and violent criminals - deserving of stiff penalties and long prison sentences - and drug-involved nonviolent offenders, who are more appropriately directed into alternatives to incarceration that can concurrently address substance use problems and protect public safety.

- b. What do you believe will be the impact of the State Department’s policy, as set forth in Ambassador Brownfield’s remarks, on U.S. efforts to continue as an international leader on drug control issues?

**ANSWER:** The Four Pillar framework is an effort to stake out a middle ground between those who believe that prosecution and jail is the only approach and those favoring radical changes to the conventions. The pillars advocate for preservation of the integrity of the conventions while accepting innovation at the national level and prioritizing cooperation against transnational organized crime. This is wholly consistent with the mandates of the conventions, which are highly respectful of domestic law while providing the tools for cooperating on controls, sharing best practices, and expanding access to essential medicines.

While our international partners are interested in the impacts of the actions taken at the state level with regard to marijuana, policies by U.S. states have not had an impact on our ability to work bilaterally and multilaterally on a range of drug issues. Countries continue to support the key areas we emphasize in our *National Drug Control Strategy*, such as strengthening international capacities to reduce drug production and trafficking, increasing efforts on public health solutions to drug use, promoting sentencing reforms that include reduced and alternative sentences for non-violent, low-level offenders with substance use disorders, and using science and evidence to guide drug policies. Our international partners also continue to recognize the urgent threats posed by transnational organized crime, and the need for strengthened international responses.

We will continue to support global efforts to reduce the global drug problem and champion a balanced approach to reduce the demand for drugs and combat trafficking.

- c. If confirmed as Director of ONDCP, what specific steps will you take to ensure that the United States remains a leader on international drug control issues?

**ANSWER:** The United States is a recognized leader in developing and promoting evidence-based drug abuse prevention and treatment programs and provides millions of dollars of funding and technical assistance to countries to support their efforts to prevent and reduce drug use and substance use disorders. We support most of the world's research on the health aspects of drug abuse and addiction, and also lead the world in efforts against international drug cartels wherever they operate, and have – with the strong support of the Congress over many years – provided training, technical assistance, and other assistance to build the criminal justice capacities of key partners around the world, especially in the Western Hemisphere, to help them disrupt and dismantle these organizations.

ONDCP, in close collaboration with the Department of State and other agencies, works multilaterally to demonstrate U.S. leadership on international drug control issues and shares best practices and research with the international community. One opportunity to ensure that the United States remains a leader on international drug control issues is at the annual United Nations Commission on Narcotics Drugs (CND). Under my direction, ONDCP is working on an ambitious agenda for the next CND meeting in March 2015.

Earlier this year, as Acting Director, I co-led the U.S. delegation to the CND, to actively promote balanced and effective drug policies under the framework of the U.N. Conventions. We conducted the following activities:

- Drafted and pushed through to enactment CND resolutions on the need for an international response to new synthetic drugs and on the importance of recovery;
- Spoke at six side events, including ones on alternatives to incarceration, drugged driving, synthetic drugs, overdose prevention, and international demand reduction;
- Held more than 10 bilateral meetings with a wide range of governments;
- Co-Chaired with Sweden an eight-country multilateral breakfast meeting on the importance of maintaining the current U.N. Drug Control Conventions;
- Participated in a high level dialogue with the United Nations Office of Drugs and Crime (UNODC) and INCB leadership;
- Conducted a patient and constructive approach on the negotiation of texts, including the longer Joint Ministerial Statement and all the other CND resolutions, to highlight U.S. positions and reject policies which advance drug legalization.

In meetings with counterparts in the international community, the United States will continue to emphasize that marijuana remains illegal under Federal law; reaffirm its strong support for the three U.N. drug conventions, and reinforce its commitment to reduce and prevent drug use,

including marijuana. We will continue to support global efforts to reduce the drug problem and champion public health interventions to reduce the demand for drugs and continuing efforts to stop trafficking and reduce supply.

## **5. Methamphetamine**

The number of methamphetamine laboratory incidents is at a seventeen-year low in Iowa, perhaps in part due to law enforcement tracking the sales of pseudoephedrine. However, the quantity of the drug itself being seized there is at a nine-year high. Much of this methamphetamine appears to be being trafficked into Iowa from Mexico. Indeed, in 2013, more than half of Iowa's drug related prison admissions were methamphetamine-related. Also in 2013, methamphetamine abuse constituted fifteen percent of all publicly-funded treatment entries, which is an all-time high percentage for Iowa.

- a. What more can the Administration do to prevent the trafficking of methamphetamine and other drugs coming from the southwest border into Iowa?

**ANSWER:** ONDCP is very concerned about current trends for methamphetamine production, trafficking, and consumption, and the Administration is working on this issue on multiple fronts. Although we do not have state-by-state breakouts from the National Survey on Drug Use and Health, the national trends suggests a statistically significant increase in adult consumption of methamphetamine between 2010 and 2013. The longstanding problem of small domestic laboratories, although still a major threat to public and officer safety, appears to be on the decline. According to reporting from the National Methamphetamine and Pharmaceutical Initiative (NMPI), which is supported by ONDCP's HIDTA Program, domestic laboratories and labs sites located have dropped from over 15,000 in 2010 to less than 7,000 in 2014 (as of the end of October). This reduction is likely a result both of retail restrictions on the sale of pseudoephedrine and the increased availability of methamphetamine produced in Mexico and smuggled across the Southwest Border. Southwest Border seizure trends over the past five years suggest a troubling increase in the flow of methamphetamine into the United States. For example, U.S. Customs and Border Protection seizures in California increased from 2,173 kilograms in 2009 to 7,255 kilograms in 2013, a more than 300 percent increase.

Although past efforts to control international diversion of pseudoephedrine and ephedrine, as well as combination products containing these substances, were relatively effective a decade ago, methamphetamine manufactures have changed their methods of production and resorted to what is known as the P2P method that does not require ephedrine. The P2P (1-phenyl-2-propanone) method employs different chemicals, sometimes referred to generally as "pre-precursors." They pose a very significant challenge to law enforcement agencies seeking to track and seize them because they are not internationally controlled. Even if one of these chemicals is on a watch list, interdiction efforts are evaded through mislabeling or outright smuggling. They are getting into

Central America and Mexico in large quantities and being turned into methamphetamine for consumption in the United States.

A number of steps are currently being taken by the Administration to combat this threat to the United States. Specifically, the Administration is engaging with China and India, two of the main precursor source countries, to improve international controls of precursor chemicals. In addition to working bilaterally, we are working multilaterally with the UNODC and the INCB to tighten international control mechanisms to prevent the diversion of precursor chemicals from legitimate international commerce. In addition, the Administration is working to improve the capacity of Mexico and Central American nations to detect and seize diverted precursors. DEA is also working closely with Mexican law enforcement to better identify and destroy “superlabs” and to disrupt and dismantle the organizations which produce and traffic methamphetamine. Moreover, this Administration is providing training and technical assistance to the Central American nations to improve precursor disposal capabilities in the region. The disposal issue is critical because partners without a safe way to dispose of vast amounts of seized chemicals will inevitably reduce their efforts at detection and seizure.

- b. If confirmed as Director of ONDCP, what specific steps will you take to address this problem?

**ANSWER:** Given the circumstances set out above, Iowa and the rest of the United States face an ongoing serious challenge with regard to methamphetamine production and trafficking. I am committed to pushing the U.S. interagency and our international partners to address it as a high priority. I will continue to support demand reduction efforts to prevent and treat methamphetamine use, a highly addictive drug. I will also advocate continued support of the NMPI as well as other efforts in the Federal interagency to reduce methamphetamine use and its consequences, such as methamphetamine cleanup funds provided through DOJ. I look forward to continuing to work with Congress to address this problem which directly threatens the health and safety of our citizens.

## **6. Synthetic Drugs**

As you know, synthetic drugs remain a vexing problem for both law enforcement and public health officials. One aspect of the challenge they pose is that many of these drugs are manufactured in China and then imported into the United States.

- a. What more can the Administration do to prevent importation of synthetic drugs, either through engaging the Chinese government or to interdict them at the border?

**ANSWER:** Synthetic drugs are indeed a vexing problem. The use of New Psychoactive Substances (NPS) is a problem not just in the United States but around the world. Over the past several years, the United States, like our partners in Europe, has been inundated with more than 250 designer synthetic drugs, challenging our capability to keep up with ever-changing chemical formulas. Manufactured in labs overseas, these drugs are unregulated and can be extremely dangerous to consume. As noted in the question, most of the raw components for these substances originate in China. The previous Director of National Drug Control Policy, R. Gil Kerlikowske, led an interagency counterdrug visit to China in 2012, during which (in addition to addressing methamphetamine precursor issues) he highlighted the Administration's concern about Chinese production and transshipment of the raw chemical components of NPS. During that visit, and after – via the DEA Office in Beijing – the United States has urged China to: ban the production and trafficking of NPS in their domestic laws; collaborate with the U.S. Government and other governments to promote international control of these substances; and work with the United States on specific cases related to NPS produced in China. There has been some incremental progress, but it has not been as rapid as we would like.

- b. If confirmed as Director of ONDCP, what specific steps will you take to address this problem?

**ANSWER:** We will continue to push for international scheduling of NPS through the World Health Organization and will, under the Department of State's leadership, collaborate with the other G-7 countries to accelerate international control of these substances. The Department of State is also funding the INCB to organize international operations to track the full supply chain process for NPS. These exercises have proved fruitful in the past in identifying key nodes in the illicit supply chain. In addition to DEA's leadership in working worldwide on the NPS problem, other agencies are also working to track and disrupt the NPS trade. The Department of Homeland Security, in particular, has been working to improve exchange of trade data on chemical products with the goal of identifying and blocking the entry of NPS into the United States. Finally, I know DEA has sought to be responsive to Congressional inquiries on how to facilitate more effective prosecution of NPS producers and traffickers. I am supportive of these discussions and look forward to exploring with Congress how to ensure that our law enforcement agencies have the authorities they need to efficiently disrupt and dismantle those organizations that are threatening the health of our citizens with these dangerous substances.