



June 22, 2016

Bruce Gellin, MD, MPH, Deputy Assistant Secretary for Health
Presidential Advisory Council on Combating Antibiotic Resistant Bacteria
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Dr. Gellin:

On behalf of the American Academy of Family Physicians (AAFP), which represents 124,900 family physicians and medical students across the country, I am responding to the [request for information](#) (RFI) by the Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria (the Advisory Council) as published in the May 23, 2016 *Federal Register*.

In the RFI, the Advisory Council invites feedback on five questions related to efforts and strategies to combat antibiotic-resistance. The AAFP is pleased to offer the following feedback which we hope assists in carrying out the Advisory Council's mission of providing advice, information, and recommendations regarding programs and policies intended to preserve the effectiveness of antibiotics.

While primary care physicians are the most frequent prescribers of antibiotics, it is a concern to the AAFP that the Advisory Council currently lacks representation from family physicians and any other primary care physicians. HHS needs to remedy this deficiency by filling future vacancies on the Advisory Council with family physicians and other primary care physicians.

As President of the AAFP, I was pleased to attend the White House Conference on Antibiotic Stewardship and provide feedback on this topic. Both Secretary Burwell and Agriculture Secretary Thomas Vilsack discussed the proper use of antibiotics to curb the tide of multi-drug resistant bacteria and *C difficile* colitis. This included the impact of "shared classes of antibiotics" which are those antibiotics used in both humans and animals.

The AAFP's policy on [antibiotics](#) recognizes inappropriate use of these important drugs as a risk to both personal and public health. As a strong proponent of patient-centered evidence-based care, the AAFP encourages members to be judicious with antibiotic prescribing. For example, it would be inappropriate to prescribe antibiotics for the management of simple otitis media and sinusitis, as noted in the Choosing Wisely Campaign recommendations. The AAFP

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