



*American Academy of Forensic Sciences
American Society of Crime Laboratory Directors
International Association for Identification
International Association of Coroners and Medical Examiners
National Association of Medical Examiners
Society of Forensic Toxicologists/ American Board of Forensic Toxicology*

6/20/2025

Jon E. Rice
Office of National Drug Control Policy
Washington, DC 20503

Dear Mr. Rice,

In response to your letter dated May 20, 2025, the Consortium of Forensic Science Organizations (CFSO), which represents six national forensic science organizations, reviewed the President's *2026 National Drug Control Strategy* with great interest.

The focus on your six priorities is commendable and on point. These priorities are essential, and we support the emphasis on advanced technologies and data collection to address the nation's ongoing drug crisis. However, we are concerned that the strategy lacks priorities or initiatives to support forensic science service providers (FSSPs). FSSPs - crime laboratories, forensic toxicology laboratories, and medical examiner/coroner's offices - are essential in tackling the challenges causing detrimental impact and significant loss of American lives from drug overdoses.

The rapid emergence of synthetic opioids, designer drugs, and novel psychoactive substances (NPS) has placed unprecedented strain on these FSSP organizations nationwide. For example, the average annual growth in forensic controlled substance analysis backlogs from 2017 to 2023 increased 23% in crime laboratories in the United States, according to West Virginia University's Project Foresight. During the same timeframe, the turnaround times (time from evidence intake into the lab to the issuance of a forensic report) increased 232% in controlled substance, and 246% in post-mortem toxicology.

FSSPs are facing increased case complexity and workload. Forensic chemists and toxicologists must continually update and revalidate their testing procedures and reference libraries to detect new substances such as fentanyl analogues and nitazene derivatives. FSSPs must now process a wider variety of dangerous substances, often at low concentrations due to their potency. This has led to increased turnaround times and backlogs and the need for continual method development and use of advanced analytical technologies, including mass spectrometry that is capable of rapid analysis and high-resolution.

Forensic toxicology laboratories face additional challenges due to the constant introduction of novel psychoactive substances and the increasing complexity of the samples being analyzed. The emergence of a myriad of potent substances has made traditional screening methods less effective requiring more time-consuming screening methods. Furthermore, the lack of established scientific data complicates the interpretation of the pharmacological effects of these substances on humans.

Medical examiner and coroner offices are at the forefront of the overdose crisis. The rise in drug-related deaths has overwhelmed many offices, increasing workloads, turnaround times, and backlogs leading to necessary creative solutions like refrigerated trailers for decedent storage and streamlined autopsy protocols for suspected overdoses. The evolving drug landscape necessitates ongoing surveillance and collaboration among agencies to promptly identify and address emerging threats. The *NFLIS 2022 Medical Examiner and Coroner Survey Report* highlights a significant challenge: 20% of responding

medical examiners and coroners rely solely on manual record-keeping, and only 31% have a computerized system for transferring data to government databases, leading to considerable unreported information.

To address these challenges, we strongly urge that the President's 2026 National Drug Control Strategy explicitly include forensic science and medicolegal service providers as a priority. This can be accomplished through a set of strategic programs that combine increased resources with expanded responsibilities for publicly funded forensic science and medicolegal institutions.

1. *Increased Resources for Forensic Science Laboratory Infrastructure and Advanced Technology:* The need for modernized instrumentation, expanded facilities, and analytical capabilities has reached a critical state. Expansion of the NIST Rapid Drug Analysis and Research (RaDAR) program into forensic science laboratories and medical examiner and coroner offices, increasing resources and personnel for surveillance testing and characterization of novel drugs entering the United States to include state, local, county and tribal forensic laboratories, medical examiners, coroners and toxicologists should be a priority. This expansion could be implemented quickly to achieve immediate impact once resources are secured. Moreover, the RaDAR program now proposes to establish a national network of accredited laboratories for testing, ensuring the collection of actionable data for informed staffing, treatment, infrastructure, and drug intelligence. The NIST Director should establish standards for laboratories to participate in RaDAR, ensuring consistency and quality across the network. It is vital that this program is coordinated with the National Forensic Laboratory Information System (NFLIS) to ensure that the data is reported in a standardized and accurate way and without duplication into national surveillance databases.
2. *Support for Medical Examiner and Coroner Data Collection and Surveillance Modernization:* Medical examiners and coroners serve an essential role in data surveillance pertaining to drug deaths across the country. Drug overdoses are unnatural deaths which can only be certified by medical examiner/coroner offices. In an overdose death, the drugs responsible for the individual's death are listed on the death certificate, which serves a critical role in drug data collection at county, state and national levels. Resources for modernizing computer network systems for publicly funded medical examiners, coroners, and forensic toxicology laboratories are desperately needed to create an interoperable electronic surveillance system for state and national drug death data collection and public health initiatives. The program should include essential infrastructure such as internet connectivity, hardware, and software for case management, an interoperable bridge among state and federal databases, and training to include standard approaches for inclusion of drugs causing or contributing to fatalities during death certification. This increases the responsibility for these offices to collect and transmit critical data electronically to High Intensity Drug Trafficking Areas (HIDTA) programs and databases such as NFLIS, the State Unintentional Drug Overdose Reporting System (SUDORS), and the National Violent Death Reporting System (NVDRS), reducing manual recordkeeping.
3. *National Surveillance, Data Sharing, and Specialized Laboratory Networks:* Promoting real-time data sharing and specialized networks to combat new drug threats is critical. The Attorney General through DEA should develop Regional Strategic Emerging Drug Laboratories (SEDs) in conjunction with the NIST RaDAR program. SEDs would include publicly funded state, local, territorial, and tribal FSSPs, with increased responsibilities for:

- Testing new substances and analogues.
- Developing validated analytical methods.
- Creating an interoperable electronic bridge among their databases, NFLIS, and RaDAR.
- Providing real-time information to NFLIS and RaDAR on emerging drugs and analogues.
- Establishing quantitative datasets for emerging drugs in non-fatal or fatal casework.

The creation of these networks will provide "near real-time information on emerging trends in illicit drug use and trafficking" to government entities, medical facilities, law enforcement agencies, and forensic laboratories will increase the ability to forecast trends. Additionally, the distribution of real-time dashboard, quarterly and annual trend reports will ensure timely intelligence sharing.

4. *Improving Crime Scene and Death Investigations with Emerging Technologies and Safety Protocols*: Pilot programs should be created to improve state, county, local, territorial, and tribal government crime scene investigations and medicolegal death investigations involving illicit synthetic drugs through emerging technologies and training. These programs should develop protocols and tools to:

- Ensure that crime scene technicians, medicolegal death investigators, medical examiners, coroners, forensic chemists, and toxicologists avoid unintentional exposure to suspected drugs of abuse by utilizing suitable personal protective equipment, such as N-95 masks and nitrile gloves. This measure effectively tackles essential safety issues for staff in crime laboratories, forensic toxicology laboratories, and medical examiner/coroner offices.
- Enhance the accessibility of detection technology and quick toxicology screening and triage for initial substance identification, which supports subsequent laboratory analysis.
- Ensure compatibility with existing analytical methods utilized by law enforcement and forensic professionals, as well as those accepted in judicial contexts.

By implementing these comprehensive measures, the United States can significantly strengthen the forensic and public health infrastructure. These proposed actions call for a commitment to equipping FSSPs – crime laboratories, forensic toxicology laboratories, and medical examiner/coroner’s offices with the necessary increased resources and clearly defined responsibilities to enable them to meet the ever-evolving challenges posed by emerging drugs through modernization, standardization, and robust, real-time data sharing.

We urge the Administration to recognize and support these essential institutions as part of a holistic and effective national drug control strategy.

Sincerely,

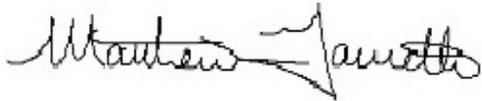
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