



To: Biden-Harris Administration Transition Team
From: The Coalition to Stop Gun Violence

While COVID-19 is currently the most pressing public health emergency facing the nation, gun violence is an ongoing public health crisis that is being exacerbated by the pandemic. There has been a surge in gun sales this year, and at the same time, we're seeing increased risk factors for gun violence, including economic instability, increased alcohol consumption, and hopelessness. While we won't know the true impact of COVID-19 on gun injuries and fatalities for quite some time, we have reason to believe the data will be incredibly troubling.

Even before this pandemic, gun violence was already at an all-time high; in 2018, the number of gun deaths was nearly 40,000 for the second year in a row. Every day, more than 100 Americans are killed and 200 Americans are shot and injured by gun violence. Millions of Americans living today are coping with the associated physical pain and mental trauma associated with gun violence.

In these times of uncertainty, a public health approach is needed in all aspects of our lives. The Coalition to Stop Gun Violence is committed to applying the public health approach to our nation's gun violence epidemic and stopping gun violence in all its forms — from suicide to domestic violence to community gun violence that often goes unnoticed by the media, and we encourage the Biden-Harris administration to do the same. This administration has the opportunity to squarely face the epidemic of gun violence that is deeply impacting our country by making urgently needed changes and to help advance firearms regulations that will keep our communities safe. In addition to meaningful, life-saving legislation Congress should pass, we recommend the following agency directives and executive actions:

Gun Violence as a Public Health Issue:

A public health approach to prevent gun violence addresses both firearm access and the factors that contribute to and protect from gun violence. This approach also brings together institutions and experts across disciplines.

- Appoint strong gun violence prevention advocates across the administration, including Secretary of Health and Human Services (HHS), Centers for Disease Control and Prevention (CDC) Director, Substance Abuse and Mental Health Services Administration (SAMHSA) Administrator, Attorney General, Deputy Attorney General, Assistant Attorney General for the Office of Legal Policy, Assistant Attorney General for Office of Justice Programs (OJP), and Director of National Institute of Justice (NIJ).
- Create an Interagency Task Force on Gun Violence Prevention responsible for developing and implementing a coordinated, comprehensive plan to address all forms of gun violence across all federal agencies.

Improve Firearms Data:

Strong data is the foundation of the public health approach. Researchers and policymakers need robust and reliable data to study and develop solutions to address the epidemic of gun violence in the United States. Without reliable and timely data, researchers are limited in their ability to comprehensively investigate firearm violence and design effective interventions.

- Direct the CDC to improve the uniformity with which local law enforcement, coroners, and medical examiners conduct and document death investigations.
- Direct the FBI and Bureau of Justice Statistics (BJS) to provide technical and financial assistance for law enforcement agencies to make the transition to the National Incident-Based Reporting System (NIBRS) and provide ongoing support to monitor and improve the quality of data.
- Direct OMB's Office of Information and Regulatory Affairs (OIRA) and the Statistical and Science Policy (SSP) Office to establish guidance on establishing reliable, timely dissemination of firearms data.
- Direct the Interagency Council on Statistical Policy to conduct a review of all firearm data sets, including outlining limitations of the data and barriers to access.
- Direct the CDC and Bureau of Justice Assistance (BJA) to determine the feasibility of integrating federal public health data and criminal justice data on firearms.
- Create an interagency working group to address data infrastructure gaps and to facilitate coordinated efforts to make data more accessible and reliable. The interagency working group should include principal statistical agencies in the Interagency Council on Statistical Policy, as well as other key agencies including the CDC, ATF, and FBI.
- Direct the National Center for Health Statistics (NCHS) to track national firearm mortality, by intent, on a quarterly and monthly basis using the Vital Statistics Rapid Release program.
- Improve nonfatal firearm injury data by directing the Agency for Healthcare Research and Quality to investigate and resolve misclassification problems within the Healthcare Cost and Utilization Project (HCUP) dataset; expand the number of hospitals included in the National Electronic Injury Surveillance System (NEISS) database; incorporate the Nationwide Emergency Department Sample (NEDS) data into the CDC's Web-based Injury Statistics Query and Reporting System (WISQARS) database to adjust the current online estimate; and add a nonfatal shooting category should to the FBI's Uniform Crime Reporting program.
- Establish a federal definition for a mass shooting as four or more injured or killed, excluding the perpetrator, regardless of place or gang and/or drug involvement.

Prevent Firearm Suicide:

Reducing access to lethal means is considered one of the most effective strategies to prevent suicide risk and as COVID-19 exacerbates risk factors for suicidality, it is more important than ever to take a comprehensive approach to prevent suicide.

- Direct the Department of Justice (DOJ) to issue best practices and offer technical assistance on extreme risk law implementation including best practices for building infrastructure to support implementation; training law enforcement, judges, and court clerks; educating allied professionals and diverse community stakeholders; and supporting state and local data collection and analysis, including the development of data infrastructure around extreme risk protection orders.
- Direct HHS to align suicide preventing training efforts throughout relevant federal programs to include a focus on lethal means safety.
- Provide funding to support lethal means counseling training for all suicide prevention lifeline staff and volunteers, health care professionals, other service providers, and health care students.
- Expand the White House PREVENTS task force to focus on suicide prevention for the whole U.S. population and include a specific focus on firearms.
- Direct the Department of Veterans Affairs to require lethal means safety counseling training for all health care professionals and others who routinely interact with veterans, including both employees and contractors.

Prevent Community Violence:

Community gun violence inflicts an enormous burden upon our country, particularly within under-resourced Black and Hispanic/Latino communities. As a result, community gun violence further perpetuates the cycles of concentrated poverty, structural disadvantage, and health inequity that already exist within these communities.

- Instruct SAMHSA, the Department of Education, and the Department of Housing and Urban Development to identify existing grant programs that can be used to support community-based violence intervention programs or that address the root causes of community gun violence.
- Direct the BJA to provide guidance and direction to states and localities use Project Safe Neighborhoods and the Edward Byrne Memorial Justice Assistance Grant (JAG) funding to support community-based violence intervention and prevention efforts including street outreach programs, group violence intervention/ focused deterrence, hospital-based violence intervention programs, trauma-informed programs that employ cognitive behavioral therapy, and shooting review commissions.

- Direct SAMHSA to reinstate and adequately fund the Resiliency in Communities After Stress and Trauma (ReCAST) grants program.
- Direct the Office for Victims of Crime (OVC) to provide guidance encouraging that Victims of Crimes Act (VOCA) funds be used to support victims of community gun violence through hospital-based violence intervention programs, community-based violence prevention programs, and mental health services for those exposed to trauma. OVC should direct states to use their federal VOCA funds to provide services and compensation specifically to victims of community gun violence by easing eligibility requirements, providing education and technical assistance to notify individuals and organizations that qualify for VOCA funds, and providing support to apply for the funds.
- Restrict the transfer of military weapons and equipment to local law enforcement agencies under the 1033 program
- Direct the Department of Justice to vigorously enforce its “pattern or practice” authority to investigate and sue law enforcement agencies that use unconstitutional policing practices.
- Use executive authority to ban ghost guns.

Prevent Lethal Domestic Violence:

Firearms contribute significantly to domestic violence in the United States — to threaten, to coerce, to control, and to kill. To reduce the number of domestic violence injuries and fatalities, we must ensure that people who abuse their intimate partners or family do not have access to firearms.

- Direct the FBI and ATF to set up a task force to outline best practices for a firearm relinquishment process. Taskforce members should include representatives from localities currently performing model firearm removal. Provide technical and financial assistance to state and local governments to establish their own firearm removal units.
- Direct Department of Defense (DoD) to continue improving the submission of disqualifying domestic violence records to NICS.
- Direct DoD to improve responses to domestic violence in the military and ensure victims are aware of support services.
- Expand the use of evidence-based lethality assessments by law enforcement in cases of domestic violence.
- Install a domestic violence specialist at each ATF field office.