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Addiction Medicine

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Wednesday, June 28, 2017

Karyl Thomas Rattay, MD, MS, FAAP, FACPM

President

Delaware Board of Medical Licensure and Discipline

Cannon Building, Suite 203

861 Silver Lake Blvd

Dover, DE 19904

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Re: Comments on Revisions to 24 Del.C. §§1713(a)(12) & 1769D

Dear Dr. Rattay,

On behalf of the American Society of Addiction Medicine (ASAM), the nation's oldest and largest medical specialty organization representing more than 4,300 physicians and other clinicians who specialize in the treatment of addiction, we would like to take this opportunity to provide comments on the addition of a new regulation clarifying the language in the Medical Practice Act pertaining to telemedicine and telehealth. With the opioid addiction and overdose epidemic significantly impacting the country and Delaware, ASAM appreciates the effort to ensure that clinicians will be able to prescribe opioids for the treatment of addiction via telemedicine.

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ASAM is dedicated to increasing access to and improving the quality of addiction treatment for patients in Delaware and across the country. To that end, we are committed to advocating for state and national addiction treatment systems that can connect patients with the care they need regardless of their socio-economic or geographical limitations. As you may know, the current opioid epidemic is compounded by an extreme treatment gap in which nearly 90% of Americans with addiction do not receive any form of treatment.<sup>i</sup> Many patients with addiction live in rural and underserved areas that make it difficult to access addiction specialist care. However, there are distance health care models that connect providers with patients using video and audio conferencing, thus increasing access to addiction treatment services for the patients that need it the most.

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Aleksandra Zgierska, MD, PhD

We find that the proposed revised regulations by the Delaware Board of Medical Licensure and Discipline will not only help patients in rural parts

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of the state connect with addiction specialists, but it will address the overprescribing of opioid medications that have contributed to the opioid epidemic. The proposed revised regulation restricts opioid prescribing via telemedicine to only permit the prescribing of medications used to treat addiction, such as buprenorphine. This is vital as four in five new heroin users start out by misusing prescription medications,<sup>ii</sup> which has resulted in the number of heroin-related deaths in the US quadrupling in the past decade.<sup>iii</sup> The combined prevention and treatment approach through this proposed revised regulation will be an important piece of the state's complete response to the opioid epidemic, as it will help reduce new cases of opioid misuse, addiction, and overdose, as well as increase the number of patients who can access treatment.

ASAM shares the state of Delaware's goal of supporting access to high quality and comprehensive addiction treatment and preventing the misuse of opioid medications that leads to addiction and overdose. We applaud this proposed revised regulation to increase the number of Delaware residents who can receive addiction treatment from a specialist by utilizing the efficiency and broad reach of telemedicine. Many patients will now be able to receive the right care they need when they need it. Please do not hesitate to contact Brad Bachman, Manager of State Government Relations, at (301) 547-4107 or [bbachman@asam.org](mailto:bbachman@asam.org), if ASAM can be of service to you. We look forward to working with you.

Sincerely,

Kelly J. Clark, MD, MBA, DFAPA, DFASAM  
President, American Society of Addiction Medicine

Anika Alvanzo, MD, MS, FACP, FASAM  
Region V Director, American Society of Addiction Medicine

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<sup>i</sup> Center for Behavioral Health Statistics and Quality. (2016). Key substance use and mental health indicators in the United States: Results from the 2015 National Survey on Drug Use and Health (HHS Publication No. SMA 16-4984, NSDUH Series H-51). Retrieved from <http://www.samhsa.gov/data/>

<sup>ii</sup> Jones CM. Heroin use and heroin use risk behaviors among nonmedical users of prescription opioid pain relievers - United States, 2002-2004 and 2008-2010. *Drug Alcohol Depend.* 2013 Sep 1;132(1-2):95- 100. doi: 10.1016/j.drugalcdep.2013.01.007. Epub 2013 Feb 12.

<sup>iii</sup> 5 Hedegaard MD MSPH, Chen MS PhD, Warner PhD. Drug-Poisoning Deaths Involving Heroin: United States, 2000-2013. *National Center for Health Statistics Data Brief.* 2015:190:1-8.