



JAMES L. MADARA, MD
EXECUTIVE VICE PRESIDENT, CEO

ama-assn.org
t (312) 464-5000

October 17, 2018

James A. Arnold
Chief, Liaison and Policy Section
Diversion Control Division
Drug Enforcement Administration
600 Army-Navy Drive
Arlington, VA 22202

Dear Chief Arnold:

On behalf of the physician and medical student members of the American Medical Association (AMA), I am writing to ask that the Drug Enforcement Administration (DEA) modify its interpretation of the allowable policies for dispensing buprenorphine for treatment of opioid use disorder to hospital inpatients. This issue was raised as one of the barriers impeding patient access to treatment with buprenorphine at the recent meeting convened by the Assistant Secretary for Health in which several DEA officials participated.

Per a July 24, 2018 letter from you to the Ohio Department of Mental Health and Addiction Services, a qualifying physician who has received a waiver from the DEA's separate registration requirement by meeting the conditions of the Drug Addiction Treatment Act of 2000 cannot issue an order for buprenorphine for a hospital inpatient and have this order filled by the hospital inpatient pharmacy, as occurs for other medications provided to hospital inpatients. Instead, the physician must issue a prescription to the patient and either provide the medication themselves or it must be filled by an outpatient pharmacy.

It is not reasonable to expect hospital inpatients to access outpatient pharmacy services, nor is it reasonable to expect physicians to dispense medications themselves as they provide services to their hospitalized patients. This DEA interpretation is a barrier to providing appropriate care to patients whose addiction requires inpatient hospital treatment. At the most recent meeting of the AMA House of Delegates, the AMA adopted a resolution seeking a solution to this problem. Please let us know how we can secure a change in policy that would allow hospital inpatients being treated for opioid use disorder to access needed medications the same way as other hospitalized patients.

Thank you for your consideration. If you have any questions, please feel free to contact Margaret Garikes, Vice President of Federal Affairs, at margaret.garikes@ama-assn.org or 202-789-7409.

Sincerely,

A handwritten signature in black ink that reads "James L. Madara". The signature is written in a cursive style with a large initial "J" and "M".

James L. Madara, MD