

May 9, 2024

The Honorable Anne Milgram  
Administrator  
United States Drug Enforcement Administration  
8701 Morrissette Drive  
Springfield, VA 22152

Dear Administrator Milgram:

Thank you for your ongoing leadership in working to ensure our patients do not lose access to telehealth treatment when clinically appropriate care includes the prescribing of a controlled substance. We write today to reiterate the importance of the Drug Enforcement Administration (DEA) moving rapidly to issue a clear and easily understood regulatory framework to allow this virtual care to continue while protecting against the diversion of controlled substances.

First, we urge you to ensure broad access to clinically appropriate services through telehealth care. Our patients often utilize treatments through telemedicine because they otherwise would not have the ability to access this care. Many patients face clinician shortages, stigma around their conditions, transportation barriers, and other barriers to care. As one example, almost 50 percent of Americans live in a mental health workforce shortage area and access to comprehensive mental health care.

Second, we urge you to act on the prescribing of controlled substances through telehealth in a timely manner. We believe it is imperative that the rulemaking be issued on a timeline that allows significant time for expert medical input from clinicians and health care organizations, given the complex health care systems and state and federal regulations with which these rules will interact. Following this period, patients, practitioners, pharmacists, and others need sufficient time to meet new requirements prior to the ending of current flexibility on December 31, 2024.

Finally, we understand the concerns expressed by DEA around the importance around safe prescribing. We believe the solution cannot create harm by unnecessarily hindering clinically appropriate and responsible prescribing. As physicians and highly-trained practitioners, we have a duty to ensure our patients care is safe, effective, and timely. Without a revised proposed rule that allows for virtual care with simple and straightforward oversight to protect against diversion – such as the special registration process outlined by Congress – many of our patients may lose access. For example, there is no version of a rule with in-person visit requirements that would not cause our patients, particularly those living in rural and underserved areas, to lose access to previously accessible health care. Additionally, an in-person visit scheduled to address medication only does little to ensure quality or safety.

Telemedicine has been a lifeline and created new access to health care. Millions of patients are waiting to find out if our clinical relationships with them will be able to continue. Please act to provide clarity that these relationships can continue.

Thank you for your consideration of this request.

Sincerely,

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