



American Society of Addiction Medicine

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November 19, 2014

Rita Arceneaux

Confidential Executive Assistant

Louisiana State Board of Medical Examiners

630 Camp St.

New Orleans, LA 70130

Dear Ms. Arceneaux,

Thank you for the opportunity to comment on the Louisiana State Board of Medical Examiners' (LSBME) proposed amendments both to rules governing the use of telemedicine in the state of Louisiana and rules governing unprofessional conduct of physicians.

Telemedicine Rule

Of particular concern to the American Society of Addiction Medicine (ASAM) and our Louisiana affiliate, the Louisiana Society of Addiction Medicine (LSAM), are the proposed changes to the provision determining the prescription of controlled substances. Specifically, the suggested amendments would prohibit physicians certified by the American Society of Addiction Medicine and/or board-certified by the American Board of Addiction Medicine from prescribing buprenorphine/naloxone medications for the treatment of an addictive disorder.

As currently written, the proposal excludes "a psychiatrist who is board certified in the subspecialty of addictive medicine." This amendment is problematic for two reasons:

1. Psychiatrists specializing in the treatment of addiction can be certified via two pathways: either as an addiction psychiatrist per the American Board of Psychiatry and Neurology or as an addiction medicine specialist by the American Society of Addiction Medicine or the American Board of Addiction *Medicine**. There is no subspecialty in "addictive medicine."

2. Furthermore, as written, the proposed rule would limit the treatment of addiction via telemedicine to psychiatrists only. As indicated previously, addiction physician specialists are certified and/or boarded as such by the ABPN, ASAM and/or ABAM. ASAM and ABAM addiction physician specialists may hold either a psychiatry or non-psychiatry primary board. In fact, fully two-thirds of addiction medicine specialists are not psychiatrists.

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ASAM and LSAM respectfully request that the LSBME amend the proposal to include language that would exclude both addiction medicine physicians and addiction psychiatrists from the controlled substances prohibition. We would also ask that the current term “addictive medicine” be changed to “addiction medicine.”

Professional Conduct Rule

According to the current “Failure to Adhere to Accepted Practices; Misleading Practices” subsection, physicians are prohibited from “hold[ing] himself or herself out as a specialist in an area of medical practice unless the physician has successfully completed a residency or fellowship training program, which is accredited by the American Council on Graduate Medical Education of the American Medical Association, the American Osteopathic Association, or the Royal College of Physicians and Surgeons of Canada.”

ASAM and LSAM are concerned that this would severely limit patient access to addiction physician specialists as the majority of practicing addiction physicians in Louisiana are addiction medicine physicians.

As mentioned earlier, addiction physician specialists are certified by a number of pathways*. Addiction psychiatrists are certified by the ABPN and addiction medicine physicians are certified by ABAM, a newly created board that assumed the role of certifying addiction medicine specialists from ASAM in 2009. ASAM has been training addiction medicine specialists since 1954 and has been a member of the American Medical Association’s House of Delegates since 1988. Together, ASAM and ABAM (currently in the process of acquiring formal recognition by the American Board of Medical Specialties) have credentialed 5000 addiction physician specialists, more than all other addiction physician subspecialties combined. Because ABAM is still in the process of acquiring ABMS recognition, the rule as proposed would exclude all addiction physician specialists credentialed by ASAM or ABAM.

In order to ensure that Louisiana’s addiction patient population has sufficient access to qualified, board-certified addiction physician specialists, we respectfully urge you to amend the proposal to exclude ASAM and ABAM credentialed physicians from this provision.

Thank you for considering our comments. We look forward to working with the LSBME on continuing our mutual goal of advancing patient access to effective, safe and compassionate medical care.

Sincerely,

Stuart Gitlow, MD, MBA, MPH, FAPA

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*Addiction physician specialists can also be certified by the American Osteopathic Association of Addiction Medicine, a subspecialty of the American Osteopathic Association.