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February 13, 2017

The Honorable Ronald D. Kouchi
President of the Hawaii State Senate
Hawaii State Capitol, Room 409
415 South Beretania St
Honolulu, HI 96813

Re: Support for SB868

Dear President Kouchi,

On behalf of the American Society of Addiction Medicine (ASAM), a national medical specialty organization representing more than 4,300 physicians and other clinicians who specialize in the treatment of addiction, and the Hawaii Society of Addiction Medicine (HSAM), we would like to thank you for introducing SB868 that would resolve differing interpretations of Hawaii Revised Statutes regarding prescribing buprenorphine to treat opioid addiction. We would like to offer our strong support for the passage of this bill, with a few suggested modifications.

HSAM and ASAM are dedicated to increasing access and improving the quality of addiction treatment for patients in Hawaii and across the country. The urgency in which the state legislature and Attorney General have responded to conflicting interpretations of the 2012 law banning physicians from prescribing buprenorphine for opioid detoxification or maintenance has been very encouraging. We believe that SB868 will correct this misinterpretation by amending Hawaii's controlled substances act to mirror federal regulations that allow physicians with a waiver to treat patients with opioid addiction using buprenorphine.


Overall, SB868 resolves the interpretation that has led certain pharmacies in the state to stop stocking buprenorphine and filling prescriptions. Yet we have recommendations on slight modifications to the language that could improve the bill. Excluding the class of schedule II medications from the purview of the bill may result in unintended consequences. This could happen if it is misapplied to methadone, if buprenorphine is

rescheduled to schedule II or if the Food and Drug Administration (FDA) approves a new effective medication that is classified as schedule II provisionally or permanently. We recommend including schedule II medications among the cited range of medications. There is no reason to exclude them since the bill language explicitly qualifies only such medications that have been FDA approved for the treatment of opioid addiction.

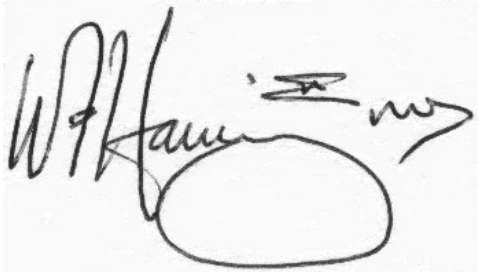
In addition, HSAM and ASAM believe that the term “detoxification” should be replaced in the bill with the more medically accurate term, “withdrawal management.” While the meaning of “detoxification” is well known, it has no consistent interpretation. We recommend replacing the initial reference with “withdrawal management (aka 'detoxification')”, and following references in the remainder of the text with "medically-managed withdrawal".

HSAM and ASAM share the state of Hawaii’s goal in providing quality and evidence-based addiction treatment to those who need it. We thank you for introducing this bill and offer our support for its passage. Please do not hesitate to contact Brad Bachman, Manager of State Government Relations, at (301) 547-4107 or bbachman@asam.org, if HSAM or ASAM can be of service to you. We look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Jeffrey Goldsmith, MD". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

R. Jeffrey Goldsmith, MD, DLFAPA, DFASAM
President, American Society of Addiction Medicine

A handwritten signature in black ink, appearing to read "W. F. Haning, III, MD". The signature is bold and cursive, with a large initial "W" and a prominent underline.

William F. Haning, III, MD, DFAPA, DFASAM
Immediate-Past-President, Hawaii Society of Addiction Medicine
Region VIII Director, American Society of Addiction Medicine