



American Society of Addiction Medicine

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TREAT ADDICTION • SAVE LIVES

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February 27, 2012

CAPT. Robert DeMartino

Federal Docket Management System Office

1160 Defense Pentagon, OSD Mailroom 3C843

Washington, DC 20301-1160

Dear CAPT. DeMartino,

The American Society of Addiction Medicine (ASAM) is grateful for the opportunity to comment on the proposed removal of TRICARE's prohibition on the use of medication-assisted maintenance therapy for the treatment of opioid dependence in TRICARE beneficiaries. ASAM represents nearly 3000 physicians who specialize in the treatment of addiction; many of whom work with active and retired military personnel, and family members, who suffer from physical dependence on and addiction to opioid medications. ASAM fully supports TRICARE coverage of both methadone maintenance and office-based opioid addiction treatment programs.

Opioid addiction is a significant and growing problem. It can occur in the context of exposure to street drugs or to diverted or prescribed pharmaceutical agents. Regardless of the means of exposure, opioid addiction is associated with significant harm to individual patients, their families, and society at large. Fortunately, our ability to help patients with opioid-related disorders has been improved greatly by the Food and Drug Administration's (FDA) approval of opioid maintenance therapy medications like methadone, buprenorphine, and naltrexone for the treatment of opioid addiction or detoxification from opioids. As noted in the December 29, 2011

Federal Register Notice on this proposed rule, the science supporting the efficacy of approaches using these medications and demonstrating dramatic progress toward wellness is robust.

As the Department of Defense (the Department) develops policies to implement medication-assisted therapy, ASAM recommends that the Department includes all aspects of pharmacological treatment of opioid dependence including patient initiation and stabilization, psychosocial assessment, appropriate dosing, and adequate duration of treatment. The following evidence-based guidelines may facilitate the development of this new TRICARE prescription drug benefit:

- “Clinical Guidelines for the Use of Buprenorphine in the Treatment of Opioid Addiction” (Substance Abuse and Mental Health Services Administration Treatment Improvement Protocol 40, http://buprenorphine.samhsa.gov/Bup_Guidelines.pdf),
- “Medication Assisted Treatment for Opioid Addiction in Opioid Treatment Programs” (Substance Abuse and Mental Health Services Administration Treatment Improvement Protocol 43, <http://www.pcspbuprenorphine.org/pcss/documents2/Training/Tip43.pdf>), and the
- “Statement of the American Society of Addiction Medicine Consensus Panel on the Use of Buprenorphine in Office-Based Treatment of Opioid Addiction” (Journal of Addiction Medicine, December 2011).

ASAM members, and their opioid-addicted patients, can attest to the life-saving benefits of these opiate-replacement treatment therapies. As such, we are uniquely positioned to address any concerns you may have as you implement this new policy. Please let us know if we can be of assistance, at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "Stuart Gitlow". The signature is written in a cursive, flowing style.

Stuart Gitlow, MD, MBA, MPH, FAPA
President, American Society of Addiction Medicine