



Michigan Society of Addiction Medicine

A Chapter of American Society of Addiction Medicine

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September 9th, 2021

Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing– Boards and Committees Section
P.O. Box 30670
Lansing, MI 48909-8170
Attention: Policy Analyst

Re: Proposed Rule Change, Licensing of Controlled Substances

Dear Director Gagliardi,

On behalf of the Michigan Society of Addiction Medicine (MISAM), the medical specialty society representing physicians and other clinicians in Michigan who specialize in the prevention, treatment, and recovery from addiction, thank you for the opportunity to comment on the Department of Licensing and Regulatory Affairs' (LARA) proposed rule changes to the [Drug Treatment Prescriber Program](#). We write today in strong support of [Part 3, 338.3137, rule 37](#) (Waiver of license requirement) which would modify the licensing requirements of the Drug Treatment Prescriber Program to better align with federal standards and extend access to quality, evidence-based treatment for addiction.

The devastating effects of the opioid epidemic have reached all parts of this country, including Michigan. In 2020, 2,684 Michigan residents died as a result of drug overdose.ⁱ This figure constituted a 14 percent increase over 2019's figure. According to data from the University of Michigan, the state is once again on pace to surpass over 2,000 overdose deaths in 2021.ⁱⁱ Many of these overdose deaths nationwide are attributable to fentanyl, which is a powerful synthetic opioid.ⁱⁱⁱ Due to the scale and devastation of the overdose crisis, it is imperative that those who suffer from overdose use disorder (OUD) have access to life-saving treatments.

Implementing this proposed rule change to prescriber licensing requirements would increase patient access to medications for addiction treatment (MAT). Due to strict licensing requirements on the prescription of controlled substances, many addiction specialist physicians (ASPs) have found the current Drug Treatment Prescriber Program rules to be obstacle to treatment. Specifically, ASPs in small, rural, or non-academic settings have found the cost of renewing these licenses as particularly prohibitive to their ability to increase treatment capacity. **Therefore, we urge that this proposed rule change at Part 3, 338.3137, rule 37 (Waiver of license requirement) be finalized for implementation by the Bureau of Professional Licensing.**

We greatly appreciate LARA's efforts to ensure the health, safety, and well-being of Michigan residents. MISAM is committed to guaranteeing access to and improving the quality of addiction treatment in Michigan. We applaud LARA's steps towards achieving this goal. We look forward to continuing to work together as we combat the opioid epidemic. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Timothy Gammons, DO, FASAM
President, Michigan Society of Addiction Medicine

ⁱ Cavitt, M. (2021, July 26). Michigan drug overdose deaths climbed to record levels in 2020 during pandemic. *Oakland County Press*. <https://www.theoaklandpress.com/2021/07/25/michigan-drug-overdose-deaths-climbed-to-record-levels-in-2020-during-pandemic/>.

ⁱⁱ University of Michigan Injury Prevention Center. (2021). *Opioid and overdose*. University of Michigan Injury Center. <https://injurycenter.umich.edu/opioid-overdose/>.

ⁱⁱⁱ The Centers for Disease Control and Prevention. (2021, March 25). *Synthetic opioid overdose data*. Centers for Disease Control and Prevention. <https://www.cdc.gov/drugoverdose/deaths/synthetic/index.html>.