



June 15, 2020

Admiral Brett P. Giroir, M.D.
Assistant Secretary for Health
U.S. Department of Health & Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Dear Admiral Giroir

ASHP (The American Society of Health-System Pharmacists) is writing to seek your support for the Mainstreaming Addiction Treatment Act of 2019 (S. 2074). Despite our nation's ongoing opioid crisis, nearly half of all U.S. counties and three-fourths of rural counties lack access to a physician with an X-waiver. S.2074 will remove the federal regulatory barrier preventing the more than 2.3 million Americans suffering from opioid use disorder from receiving evidence-based treatment from qualified providers, including pharmacists where authorized under state scope of practice laws.

ASHP represents pharmacists who serve as patient care providers in acute and ambulatory settings. The organization's nearly 55,000 members include pharmacists, student pharmacists, and pharmacy technicians. For more than 75 years, ASHP has been at the forefront of efforts to improve medication use and enhance patient safety.

Pharmacists already play a crucial role in addressing the issues of overprescribing and ineffective pain management that contribute to the opioid epidemic. Their activities include developing pain management plans, promoting access to opioid safety initiatives, and checking state prescription drug monitoring programs to prevent overlapping opioid prescriptions. Many states have already acknowledged the benefit of pharmacists engaged in medication-assisted treatment (MAT) and have expanded their scopes of practice to allow them to provide a range of patient care services. CMS has also urged participation of pharmacists in Opioid Treatment Programs to deliver MAT to Medicare beneficiaries. Federal pharmacists are uniquely positioned to help treat MAT patients due to their advanced scope of practice afforded to them by the departments they serve.

Despite their medication expertise, pharmacists are not eligible for an X-waiver. ASHP asks that you support legislation to end the federal X waiver requirement that prevents pharmacists and other qualified providers from providing needed care to patients struggling with opioid use disorder. Pharmacists are not opposed to training for buprenorphine prescribers which is required to attain an X-waiver, in fact, many already have completed this training.

S. 2074 will eliminate the requirement for an X-waiver and increase the number of providers who can prescribe buprenorphine. I urge you to consider supporting this much-needed legislation. Thank you for your consideration. Please let me know if I can provide any additional information.

Sincerely,

Tom Kraus
Vice President, ASHP Government Relations