

April 2, 2024

The Honorable Anne Milgram
Administrator
United States Drug Enforcement Administration
8701 Morrisette Drive
Springfield, VA 22152

Dear Administrator Milgram:

Thank you for your leadership and engagement in public listening sessions last fall related to telemedicine flexibilities and for your actions to ensure continued patient access to care delivered through telemedicine in advance of final telemedicine regulations this year.

Now that the first quarter of 2024 has passed, we write to request that DEA expedite the release of a revised proposed rule to permit and regulate the prescribing of controlled substances through telehealth. This rule is crucial for access to mental health, substance use disorder, and other telehealth care. As you know, the current flexibilities for telehealth expire at the end of this year; we request the updated rules be proposed immediately for the following reasons:

- Given the complexity of these issues and the significant stakeholder interest (as demonstrated through more than 38,000 public comments received by DEA on proposed rules), DEA must plan to ensure stakeholders have adequate time to provide feedback on any policy proposal.
- If DEA were to create a special registration process for telehealth prescribers, as proposed by both DEA and many stakeholders, significant operational lead time would be needed for DEA, practitioners, pharmacies, and other related service providers to implement the new special registration process and comply with other potential operational requirements and guardrails.
- Given widespread provider shortages, particularly in the mental health and substance use disorder treatment spaces, a rulemaking late in the year that makes significant policy changes would affect the ability of patients and clinicians to make appointments and ensure consistent access to care. While we hope the final rulemaking preserves patient access, any policy change that requires patients to seek in-person care would be extremely disruptive due to long scheduling lead times and in-office wait times.
- In addition to operational and implementation challenges for clinicians, there will be significant operational and staff training needs for pharmacies and other parts of the healthcare delivery system to ensure patients uninterrupted access to needed medical treatments offered through telehealth.
- Finally, DEA's national leadership is needed to set a clear path forward for the nation and to encourage more consistent definitions and aligned requirements from state regulatory bodies. Alignment of requirements is needed to simplify compliance for healthcare providers and encourage telehealth providers to offer care in our nations most underserved areas – without geographic barriers such as state lines limiting access to care.

Thank you for your consideration of this request. We looking forward to working with you to ensure continued access to needed telehealth services for all Americans while protecting against diversion and inappropriate use.

Sincerely,

A Mind Affair LLC
Access TeleCare, LLC
Ace Mentality
ACHIEVE Psychiatric Wellness Center
Advanced Practice Psychiatry, LLC
AGMP Telehealth
Alliance for Connected Care
Alliance Mental Health
Alliance of Community Health Plans (ACHP)
Allina Health
ALS Association
Amazon
American Academy of Hospice and Palliative Medicine
American Academy of Neurology
American Academy of PAs
American Association of Nurse Practitioners
American Association of Psychiatric Pharmacists
American Health Care Association/National Center for Assisted Living
American Psychological Association Services
American Telemedicine Association
American TelePhysicians
American Urological Association
AmplifyMD
Anderson Mental Health Services LLC
Anxiety and Depression Association of America
Array Behavioral Care
Aspire Mental Health
Association for Behavioral Health and Wellness
At Your Service Psychiatry, PLLC
ATA Action
Baylor Scott and White Health
Ben Archer Health Center
Bicycle Health
Big Cities Health Coalition
Broad Mountain Holistic Mental Health Services
Caregility
Casel Mental Health and MetRX
Center for Freedom and Prosperity
Centerstone
Chesapeake Psychological Associates
Choptank community health
Cincinnati Children's
Circle Medical
Clinical Social Work Association

Coalition for Headache and Migraine Patients (CHAMP)
Collective Energy for Nurturing Training in Reproductive and Sexual Health (CENTRS Health)
College of Healthcare Information Management Executives (CHIME)
Columbia University Irving Medical Center
CommonSpirit Health
Compass Psychiatric Wellness
Compassion & Choices
Complete Behavioral Health
Connected Health Initiative
CONQUER ADDICTION PLLC
Consumer Technology Association
Corewell Health
CurieDx
Digital Medicine Society (DiMe)
Dogtown Media / NeurCare
DoseSpot
Doxy.me Inc.
DreamCloud Psychiatry
Driscoll Health System
Eagle Telemedicine, LLC
Eleanor Health
Elite Medical Partners
Embrace Health
Encounter Telehealth
Epilepsy Foundation
Essential Grace Mental Health Care Services LLC
Estrella Cognitive Care
ExamMed
Facilitation Health PLLC
Fig Tree Behavioral Wellness, LLC
Firefly Health
FOLX Health
FreedomWorks
Funner Mental Health, LLC
Gender Wellness Center, Bassett Healthcare Network
Ghaly Healing and Wellness Center
GRIN2B Foundation
Guide to Wellness PA
Half Full Psychiatry
HardemanCounty Community Health Center
Harmony & Unity Mental Health
Harmony mental health
Hawkins Group
HealthQuarters Inc dba HealthQ

HER Psychiatric Services
Hims & Hers Health, Inc.
HIMSS
Hopeful Mind Mental Health, PLLC
Hopscotch Health
Human Vitality
Hydrocephalus Association
Impact Carolina Services, Inc
IMPOWER
In-Tuitt Behavioral Health Services
Indiana University Health, Inc.
Integrated Telehealth Partners
International Foundation for Autoimmune & Autoinflammatory Arthritis (AiArthritis)
Iye CollaborativeLLC
Johns Hopkins University and Medicine
Karis Holdings, LLC
KeyCare, Inc & KeyCare Medical Group
Kinspire Inc
Kohnlinq Inc.
LeadingAge
Lifepoint Health
LMA Mental Health Services
Logan Wellness Advanced Nursing Practice Corp.
Loma Linda University Health
LT Telehealth/LocumTenens.com
Marsha's Tea Room
Marshfield Clinic Health System
Mass General Brigham
Massachusetts Health Data Consortium
Maternal Mental Health Leadership Alliance
Meadowlark Psychiatric Services
Medical Group Management Association
Meds.com
Mend VIP, Inc.
Mental Health America
Mentavi, Inc.
Miles for Migraine
Mind body behavioral health
Mind Revive Psychiatry
Mindful Intentions, LLC
Minnesota Hospital Association
Mobile Primary Care
National Association for Home Care & Hospice
National Association of Pediatric Nurse Practitioners

National Disability Rights Network (NDRN)
National League for Nursing
Nest Collaborative
New Jersey Association of Mental Health and Addiction Agencies, Inc.
NextGen Healthcare
NIM Longevity
Noma Therapy
Ophelia
Oshi Health
OY Nursing Corporation
Pandemic Patients
Paragon Behavioral Health
Partnership for Employer-Sponsored Coverage (P4ESC)
Partnership to Advance Virtual Care
PAs in Virtual Medicine and Telemedicine
Patient Access Network (PAN) Foundation
Perinatal Mental Health & Wellness
Planned Parenthood California Central Coast
Policy Center for Maternal Mental Health
Population Health Analytics Association Incorporated
Premier Inc.
Pro-Mental Health Connection
Psychboston
Psychiatric Medical Care
Psychiatric Medical Practitioners, Inc.
QMed, LLC
Quartet Health
QueerDoc
Red Cedar Counseling
Red Clover Wellness
Reproductive Health Access Project
Resolve Psychiatric Services
Revive Mental Health Solutions LLC
Riverview Practice
Ro
RxHomeTest
Sandpiper Wellness
Sanford Health
Satori Mental Health LLC
Seasons of Wellness
Serenity Health Care, PLLC
Shadow Mountain Mental Health
Shrewsbury wellness center
Small Business & Entrepreneurship Council

Society for Participatory Medicine
SohoMD
Southern Comfort Psychiatric Services, LLC
Spectrum: The Other Clinic
Stanford Health Care
Stony Brook University Medical Center
STXBP1 Foundation
Sunrise Mental Health
Swing Care
Synchronous Mental Health
Synergy Family Psychiatric Services LLC
Talkiatry
TECHMEDO
TeleMed2U
Texas Health Resources
Texas Tech University Health Sciences Center
The Global Telemedicine Group
The Process Psychiatry and Wellness
The Trevor Project
TheraTec, Inc
Thirty Madison / KMG Medical Group
Transgender Health & Wellness Center
Transhealth
True U Clinic
University of Pittsburgh Medical Center (UPMC) Health System
URAC
UVA Health
VerifiNow inc
Vesta Healthcare
WeKonnnect,LLC.
Welcome Home Health, Inc
Wellcore, Inc
Welliti
WellTrust Medical
Willow Behavioral Health
Workit Health
Yale New Haven Health