

June 9, 2016

Andrew B. Bindman, MD, Director  
Agency for Healthcare Research and Quality  
5600 Fishers Lane  
Rockville, MD 20857

***Re: Draft Technical Brief - Medication-Assisted Treatment Models of Care for  
Opioid Use Disorder in Primary Care Settings***

Dear Dr. Bindman:

The Academy of Managed Care Pharmacy (AMCP) thanks the Agency for Healthcare Research and Quality (AHRQ) for its work in developing strategies to address the growing opioid epidemic in the United States and for the opportunity to provide comments in response to the draft technical brief titled “Medication-Assisted Treatment (MAT) Models of Care for Opioid Use Disorder in Primary Care Settings.” AMCP commends AHRQ for recognizing the important role that pharmacists can play in MAT and recommends that AHRQ consider supporting legislation to expand the ability of non-physician practitioners, including qualified nurse practitioners, physician assistants, and pharmacists, with appropriate training and state licensure to prescribe buprenorphine for opioid addiction. In addition, AMCP encourages AHRQ to include recommendations related to team-based care and education on diversion prevention strategies prior to finalization.

AMCP believes that a holistic, comprehensive, and multi-stakeholder approach among health care providers and patients is necessary to truly address the opioid epidemic. AMCP is committed to resolving issues associated with the opioid epidemic and has established an Addiction Treatment Advisory Group which will evaluate current gaps and barriers to addiction treatment services and develop recommendations to improve patient care. AMCP will share the recommendations and findings from the advisory group with AHRQ and other stakeholders.

AMCP is a professional association of pharmacists and other practitioners who serve society by the application of sound medication management principles and strategies to improve health care for all. The Academy's 8,000 members develop and provide a diversified range of clinical, educational, medication and business management services and strategies on behalf of the more than 200 million Americans covered by a managed care pharmacy benefit.

AMCP commends AHRQ for recognizing the value of incorporating a pharmacist in MAT through physician-pharmacist collaborative models in which patients are managed using medication therapy management (MTM). In addition to advocating for the role of the pharmacist in a collaborative care model, AMCP encourages AHRQ to work with Congress to find a mechanism for expanding the definition of a qualified practitioner under section 303(g)(2) of the Controlled Substances Act to include additional providers, such as qualified nurse practitioners, physician assistants, and pharmacists. Enabling non-physician practitioners to prescribe buprenorphine, with the appropriate training and state licensure, is critical to expanding opioid abuse disorder treatment to a greater number of individuals throughout the nation.

Prior to finalization of the draft technical brief, AMCP encourages AHRQ to work collaboratively with other federal agencies, such as Health and Human Services (HHS), the Centers for Diseases Control and Prevention (CDC), and the Food and Drug Administration (FDA), providers, pharmacists, and patients to develop a holistic, comprehensive, and multi-stakeholder approach to address the opioid epidemic. In the spirit of collaboration, AMCP also encourages AHRQ to include a recommendation to work collaboratively and communicate effectively with the patient's care team, including pharmacists and other health care providers who provide patient care and psychosocial services, to ensure a holistic and comprehensive approach to the patient's individualized treatment. Furthermore, AMCP urges AHRQ to consider the inclusion of training and education programs for qualified physicians to minimize the risk of diversion of buprenorphine and provide sound medication management.

AMCP appreciates your consideration of the concerns outlined above and looks forward to continuing work on these issues with AHRQ. If you have any questions regarding AMCP's comments or would like further information, please contact me at 703-683-8416 or [scantrell@amcp.org](mailto:scantrell@amcp.org).

Sincerely,



Susan A. Cantrell, RPh, CAE  
Chief Executive Officer