

April 1, 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  
Department of Psychiatry, University of Maryland School of Medicine  
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