



January 18, 2022

Anne Milgram
Administrator
United States Drug Enforcement Administration
8701 Morrisette Drive
Springfield, Virginia 22152

RE: Regulation of Telepharmacy Practice [RIN 1117-AB74/Docket No. DEA-759]

On behalf of the College of Psychiatric and Neurologic Pharmacists (CPNP), we appreciate the opportunity to provide feedback on the Drug Enforcement Administration's (DEA) advance notice of proposed rulemaking (ANPR) regarding the practice of telepharmacy. Telemedicine and the ability to digitally prescribe medications including controlled substances is vital to providing access to comprehensive care for vulnerable and hard to reach patients. This has been particularly important during the COVID-19 pandemic.

CPNP is a professional association of nearly 3,000 board certified and residency trained clinical pharmacists that specialize in psychiatry, substance use disorder, psychopharmacology, and neurology. CPNP envisions a world where all individuals living with mental illness, including those with substance use and neurologic disorders, receive safe, appropriate, and effective treatment. With their specialized training in pharmacology, pharmacokinetics, and drug-drug and drug-disease interactions, psychiatric pharmacists partner, as a member of the health care team with primary care providers, psychiatrists, and other health care professionals.

While psychiatric pharmacists do not dispense medication, psychiatric pharmacists provide telepharmacy services as defined in the ANPR including: (1) prescribing of or consultation on proper medication use and dosing; (2) patient evaluations and follow-up for medication response and adherence; (3) medication management including modifications to avoid adverse reactions and drug interactions; and (4) medication education or counseling for patients and their caregivers.

Therefore, CPNP strongly supports the use of telemedicine and telepharmacy and urges the DEA to continue to allow these services to be provided without imposing barriers that would impede access. Telepharmacy has helped expand access to pharmacy care for rural and other underserved populations that otherwise may not have been able to employ full-time licensed pharmacists. The dispensing of controlled medications under the Controlled Substance Act are part of all pharmacies dispensing systems and limiting the ability of dispensing via telepharmacy would be detrimental to patients with already limited access to healthcare and transportation.

Thank you again for the opportunity to comment on this important patient access issue. If you have any questions or require any additional information, please do not hesitate to contact me or our Health Policy Consultant, Laura Hanen at laura.hanen@faegredrinker.com.

Sincerely,

A handwritten signature in black ink, reading 'Brenda Schimenti'.

Brenda K. Schimenti
Executive Director