



October 5, 2023

Kimberly Anderson, Chief Legal Officer

Ohio State Medical Board
30 East Broad Street, 3rd Floor
Columbus, OH 43215

Sent via Email to Medical Board at: Kimberly.Anderson@med.ohio.gov

RE: Proposed Rules 4731-33: 01-04

Dear Ms. Anderson,

Thank you for the opportunity to comment on Rules 4731-33: 01-04—Office Based Treatment for Opioid Addiction.

The Academy of Medicine of Cleveland & Northern Ohio (AMCNO), founded in 1824, is the region's professional medical association and the oldest professional association in Ohio. We are a non-profit 501(c)6 representing over 6,700 physicians and medical students from all the contiguous counties in Northern Ohio. We are proud to be the stewards of Cleveland's medical community of the past, present, and future.

The mission of the AMCNO is to support physicians in being strong advocates for all patients and to promote the practice of the highest quality of medicine. With that in mind, we offer the following comments.

4731-33-03: Section (A)(3): Continuing Medical Education Requirements

We respectfully disagree with the Board's inclusion of 8 hours of "Category 1," continuing medical education relating to substance abuse and addiction every two years to prescribe buprenorphine. This requirement puts Ohio in a category outside other states, who do not have such requirements, leading to a potential access issue for our patients. From our research on this topic, we have found only one other state, Kentucky, with a CME requirement to prescribe buprenorphine. The more barriers in place to potential prescribers, the less likely those prescribers are to offer this treatment to patients. With the current shortage of addiction specialists in Ohio, and an opioid epidemic that continues to surge, we ask the board to reconsider this requirement.

4731-33-03: Section (E): Behavioral Health Treatment Requirement


We support the board's removal of the behavioral health treatment requirement, and the change to instead require an assessment of each patient's psychosocial treatment needs in addition to medication. While well-intentioned, the original requirement forcing a physician to work with a behavioral health provider for all patients had the potential to decrease access to care and cause significant delays in care to patients.

4731-33-03: Section (G)(7): Dosage Limits

We support the board's change to allow for the prescribing of 32 mg per day of buprenorphine if a prescriber is a board-certified addiction specialist or addiction psychiatrist, or a consultation has been obtained from such a specialist recommending the higher dose. We believe clinically this change is appropriate and allows for a prescriber to adjust the dosage of medicine when and where appropriate.

Thank you again for the opportunity to comment and for your continued efforts to advocate in the best interest of Ohio's physicians.

Sincerely,

A handwritten signature in black ink that reads "Jen Johns". The signature is written in a cursive, flowing style.

Jen Johns, MPH
AMCNO Executive Director