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February 27, 2025

The Honorable Derek S. Maltz  
Acting Administrator  
Drug Enforcement Administration  
8701 Morrissette Drive  
Springfield, Virginia 22152

Attn: Heather Achbach, Regulatory Drafting and Policy Support  
Section, Diversion Control Division

**Re: Expansion of Buprenorphine Treatment via Telemedicine  
Encounter (Docket No. DEA-948)**

Dear Acting Administrator Maltz:

On behalf of the American Society of Addiction Medicine (ASAM), a national medical specialty society representing more than 8,000 physicians and associated health professionals who specialize in the prevention and treatment of addiction, thank you for the opportunity to provide comments on the Expansion of Buprenorphine Treatment via Telemedicine Encounter final rule from the US Drug Enforcement Administration (DEA), Department of Justice (DOJ), Substance Abuse and Mental Health Services Administration (SAMHSA), and Department of Health and Human Services (HHS).

**ASAM supports the final rule with an effective date of March 21, 2025, and commends the DEA, DOJ, SAMHSA, and HHS on substantive changes from the original 2023 notice of proposed rulemaking (NPRM) that will permanently preserve critical flexibilities for the initiation of buprenorphine treatment for opioid use disorder (OUD) via telemedicine.**

Notable improvements include expanding the originally proposed initial 30-day prescription limitation to six months, removing the requirement for an in-person medical evaluation to issue additional prescriptions, introducing reasonable safeguards to protect against diversion, including a requirement for the remote prescriber to review the prescription drug monitoring program data of the patient's state, and avoiding burdensome recordkeeping requirements initially proposed in the original NPRM.

ASAM also appreciates the clarification that the new effective date will not delay or limit the ability of the practitioners covered by the rule to prescribe via telemedicine, because the “Temporary Extension of COVID-19 Telemedicine Flexibilities for Prescription of Controlled Medications” permits practitioners to prescribe via telemedicine through December 31, 2025.

Thank you again for the opportunity to comment.

Sincerely,

*Brian Hurley, MD*

Brian Hurley, MD, MBA, FAPA, DFASAM  
President, American Society of Addiction Medicine

CC:

The Honorable Pam Bondi, Attorney General, US Department of Justice  
The Honorable Christopher D. Carroll, Principal Deputy Assistant Secretary, US Substance Abuse and Mental Health Services Administration  
The Honorable Robert F. Kennedy, Jr., US Department of Health and Human Services