



# Michigan Society of Addiction Medicine

*A Chapter of American Society of Addiction Medicine*

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November 1<sup>st</sup>, 2021

The Honorable Bronna Kahle  
Chair, Committee on Health Policy  
Michigan House of Representatives  
124 North Capitol Avenue  
Lansing, MI 48933

Re: Michigan Society of Addiction Medicine (MISAM) Support for SB 412

Dear Chair Kahle,

On behalf of the Michigan Society of Addiction Medicine (MISAM), the medical specialty society representing physicians and clinicians in Michigan who specialize in the treatment of addiction, we would like to take this opportunity to express our support for SB 412, which would remove prior authorization requirements on medication for addiction treatment (MAT). With the opioid addiction and overdose epidemic significantly impacting Michigan, we applaud this legislation for seeking to expand the state's addiction treatment services for persons suffering from substance use disorders (SUD).

MISAM is dedicated to increasing access to and improving the quality of addiction treatment for patients in Michigan. To that end, we are committed to advocating for a state addiction treatment system that provides and expands access to all Food and Drug Administration (FDA)-approved medications to treat SUD. As addiction medicine specialists, we are wholeheartedly committed to evidence-based, compassionate care that improves the health and well-being of all patients with addiction. We applaud this legislation as it seeks to reduce regulatory hurdles faced by addiction specialist physicians (ASPs). Ensuring addiction treatment services are not subject to arbitrary limits or unfair utilization controls is a critical part of our efforts to improve access to care. We believe SB 412 will effectively decrease the barriers to care that prior authorization can cause for patients presenting themselves for addiction treatment.

When a patient presents themselves for treatment, it is vital that the provider stabilize the patient as quickly as possible through the use of medication for addiction treatment (MAT). The Substance Abuse and Mental Health Services Administration (SAMHSA) notes that MAT has been shown to improve patient survival, increase retention in treatment, decrease illicit opiate use and other criminal activity among people with substance use disorders, and increase patients' ability to gain and maintain employment.<sup>i</sup> However, when burdensome prior authorization requirements delay their prescription, physicians cannot offer MAT as quickly as necessary to effectively treat their patients.<sup>ii</sup> In fact, a recent survey of physicians found that 92% of them reported care delays due to prior authorization, with 64% reporting a delay of at least one business day.<sup>iii</sup> This delay significantly impacts patient outcomes. A delay of just one day is enough time for a patient to relapse, overdose, or suffer a myriad of other experiences that can adversely affect their treatment outcome. By working to remove this delay, SB 412 takes a significant, positive step towards turning the corner on the opioid epidemic.

Due to the harmful consequences of non-evidenced-based utilization controls and consistent with sound medical care, decisions about the type, modality, and duration of treatment should remain in the purview of doctors and their patients. Additionally, arbitrary limitations on the duration of treatment, medication dosage, type of medication, or on levels of care that are not supported by medical evidence, are not appropriate and can be specifically detrimental to the wellbeing of the patient and their community. Given how dangerous these non-evidence-based limitations are, they should not be enforced by law, regulation, or health insurance practices. Therefore, MISAM supports this bill's prohibition on requiring prior authorization for the prescription of any form of MAT.

MISAM shares the Health Policy Committee's goal of providing access to high-quality, evidence-based, and comprehensive addiction treatment services to our most vulnerable patients. We offer our support for this bill and strongly recommend the committee favorably report it. Please do not hesitate to contact me at [timgammons@yahoo.com](mailto:timgammons@yahoo.com), if you have any further questions. We look forward to working with you.

Sincerely,



Timothy Gammons, DO, FASAM  
President, Michigan Society of Addiction Medicine

CC: The Honorable Angela Witwer  
The Honorable Luke Meerman  
The Honorable Curtis Hertel  
The Honorable Julie Alexander  
The Honorable Sue Allor  
The Honorable Jim Ananich  
The Honorable Andrew Beeler  
The Honorable John Bizon  
The Honorable Marshall Bullock  
The Honorable Stephanie Chang  
The Honorable Cara Clemente  
The Honorable Graham Filler  
The Honorable Andrew Fink  
The Honorable Roger Hauck  
The Honorable Jeff Irwin  
The Honorable Kim LaSata  
The Honorable Michael MacDonald  
The Honorable Christine Morse  
The Honorable Mike Mueller  
The Honorable Cynthia Neeley  
The Honorable Laurie Pohutsky  
The Honorable JR Roth  
The Honorable Sylvia Santana  
The Honorable Wayne Schmidt

The Honorable Lori Stone  
The Honorable Mark Tisdell  
The Honorable Mary Whiteford  
The Honorable Karen Whitsett  
The Honorable Paul Wojno

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<sup>i</sup> Substance Abuse and Mental Health Services Administration. "Medication and Counseling Treatment." 12 February 2020. Substance Abuse and Mental Health Services Administration, web, 17 February 2020.

<sup>ii</sup> Legal Action Center. (2015). Confronting an Epidemic: The Case for Eliminating Barriers to Medication Assisted Treatment of Heroin and Opioid Addiction. Washington, D.C: Legal Action Center. Available at <https://lac.org/resources/substance-use-resources/medication-assisted-treatment-resources/case-for-eliminating-barriers-to-medication-assisted-treatment-of-heroin-and-opioid-addiction/>

<sup>iii</sup> The American Medical Association. Survey of 1,000 Physicians to investigate attitudes towards prior authorization. United States, 2017. Available at: <https://www.ama-assn.org/sites/ama-assn.org/files/corp/media-browser/public/arc/prior-auth-2017.pdf>