



Comments of the American College of Clinical Pharmacy

**Statement to the United States Senate Committee
on Finance in Response to the Request for
Feedback on how to Improve Medicare, Medicaid
and Human Services Programs Responses to the
Opioid Epidemic.**

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Combating Prescription Opioid Abuse through Team-Based Comprehensive Medication Management

The challenges that the ongoing prescription opioid abuse epidemic poses to our communities are well documented. It is estimated that each year across the country approximately 260 million painkiller prescriptions will be filled. In addition, according to the Government Accountability Office (GAO), more than 170,000 Medicare beneficiaries may be battling addiction to pain medications. Many are actively engaged in "doctor shopping" for physicians who will unknowingly write redundant opioid prescriptions.

Among a number of key factors contributing to this escalating opioid crisis, a trend towards more aggressive pain management and the introduction of newer opioid formulations led providers to prescribe opioids with little regard for basic pharmacotherapy - getting the right medication at the right dose for the right patient. The full integration of clinical pharmacists into patient-centered health care teams is essential to help ensure the safe, rational prescribing and use of opioids.

The American College of Clinical Pharmacy (ACCP) applauds the Senate Finance Committee for its outreach to stakeholders to request input on policy changes to address this epidemic by stopping the illegal diversion of prescription painkillers, reducing the overuse of opioids for treating long-term pain and helping those battling addiction receive appropriate treatment.

ACCP is a professional and scientific society that provides leadership, education, advocacy, and resources enabling clinical pharmacists to achieve excellence in patient care practice and research. ACCP's membership is composed of almost 18,000 clinical pharmacists, residents, fellows, students, scientists, educators and others who are committed to excellence in clinical pharmacy practice and evidence-based pharmacotherapy.

As part of the Committee's efforts to provide relief from the scourge of the opioid epidemic effort, ACCP urges you to include reforms to the Medicare program that provide for coverage of comprehensive medication management (CMM) services provided by qualified clinical pharmacists as members of the patient's health care team.

CMM is a collaborative, team-based approach to patient care delivered by clinical pharmacists operating under formal collaborative practice agreements or clinical privileges granted by the health care setting in which the pharmacist practices. CMM is furnished directly to patients in full collaboration with their physicians and healthcare team utilizing formal "collaborative drug therapy management" (CDTM) agreements which are authorized in forty nine states. By helping ensure that patients' medication use is effectively coordinated, this service enhances patients' health care outcomes and reduce healthcare costs for patients with chronic illnesses, including chronic pain. By helping to optimize the positive effects of drug therapy, while minimizing opportunities for prescription drug abuse and misuse, this keeps patients healthier, improves their quality of life, and saves money.

Yet Medicare’s current benefit structure lacks a team-based and patient-centered medication management service for the vast majority of beneficiaries.

As part of the patient care team, pharmacists providing CMM identify appropriate goals for opioid therapy in individual patients, recommend alternatives if these goals are not met, and monitor adverse effects of opioids to mitigate the risks of oversedation and overdose.

In providing CMM to patients with chronic pain, clinical pharmacists help:

- ensure patients reach medication-related clinical goals that are established through shared decision making with all members of the health care team
- address opioid use and/or misuse when applicable
- educate patients and health care providers about acute and chronic pain therapeutics
- evaluate and implement clinical pathways and systems to optimize use of opioids and other controlled substances for therapeutic use.

In addition, clinical pharmacists can administer naloxone and guarantee appropriate education on its use in patients experiencing an opioid overdose, and can also ensure that patients identified as having opioid use disorder are appropriately referred to treatment centers to address their addiction.

CMM contributes to enhanced productivity for the entire health care team, allowing other team members to be more efficient in their own patient care responsibilities. Physicians are able to dedicate more time to the diagnostic and treatment selection process, enabling them to see more patients and spend more time providing medical care. Team members are freed up to practice at the highest level of their own scopes of practice by fully utilizing the qualified clinical pharmacist’s skills and training to coordinate the medication use process as a full team member.

A fully integrated, patient-centered, team-based approach to health care delivery is essential in order to fundamentally address the issue of prescription opioid abuse within the Medicare population. Pharmacists should be the stewards of appropriate opioid therapy optimal pain management for all patients – already several states mandate that pharmacists review patients’ controlled substances through proven successful prescription drug monitoring programs (PDMPs).

As part of this effort, Congress should enact legislation to reform Medicare to cover comprehensive medication management services provided by qualified clinical pharmacists as members of the patient’s health care team.

Thank you once again for your commitment to identify Medicare payment incentives that can be used to remove barriers or create incentives for beneficiaries to access evidence-based prevention, screening, assessment, and treatment for opioid-use disorders. Please don’t hesitate to call us if ACCP can be of any assistance.

For more information, contact the ACCP Office of Government Affairs at (202) 621-1820