

Comments of Shruti Kulkarni
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**Training Health Care Providers on Pain Management and Safe Use of Opioid Analgesics—
Exploring the Path Forward Public Workshop**

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Good morning. I am Shruti Kulkarni. I am outside counsel to the not-for-profit Center for Lawful Access and Abuse Deterrence (CLAAD).

CLAAD's funders include treatment centers, laboratories, and pharmaceutical companies, and are disclosed on our website, www.claad.org.

Our organization works to reduce prescription drug fraud, diversion, misuse, and abuse, while also ensuring that individuals with legitimate needs have lawful access to medications that safely and effectively treat their health conditions.

Thank you for the opportunity to offer comments regarding training health care providers on pain management and safe use of opioid analgesics. Since 2010, our organization has taken an active role in encouraging mandatory prescriber education at the federal level for health care practitioners who prescribe any controlled prescription medications.

We base this recommendation on the following facts:

Under federal and state controlled substances acts, the risks of abuse potential and related duties are categorized by controlled substance schedules (*e.g.*, CII vs. CV), regardless of drug class (*e.g.*, opioid analgesic vs. benzodiazepines).

Controlled medications, by definition, have a higher potential for abuse than non-controlled medications. Therefore, practitioners who prescribe CPMs to patients have a higher duty of care. Prescribers of controlled medications must take affirmative steps to prevent diversion, misuse, abuse, addiction, and overdose.

Through mandatory education, practitioners can learn how to treat their patients safely while preventing adverse events.

Mandatory provider education should include greater detail on best practices for prescribing controlled prescription medication, including:

- Trying non-pharmacologic, non-controlled, and lower-scheduled treatments first;
- Verifying through definitive urine drug testing that patients are taking prescribed medications, and not illicit substances or medications not prescribed to them; and
- Referring patients with inappropriate substance use to a higher level of care, which may include addiction treatment.

Finally, while some state legislatures have taken proactive steps to prevent prescription drug abuse by requiring mandatory prescriber education, many have not. Prescriber education is needed on a national level.

CLAAD recommends that mandatory prescriber education be tied to the prescriber's controlled substance registration and use the state continuing medical education infrastructure for course content.

Our full recommendations and the legal analysis of how the federal government should proceed are set forth in our article "The Best of Both Worlds: Applying Federal Commerce and State Police Powers To Reduce Prescription Drug Abuse."

Thank you again for this opportunity. Please contact CLAAD if we can be of service to you.