



November 5, 2024

Neera Tanden
Director, U.S. Domestic Policy Council
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

RE: Drug Enforcement Administration (DEA) Teleprescribing of Controlled Substance Flexibilities

Dear Director Tanden,

On behalf of the National Association of Community Health Centers (NACHC) and the 216 undersigned organizations, we write urging the Biden Administration to work with the Drug Enforcement Administration (DEA) and other relevant agencies to implement a two-year extension to the current Public Health Emergency teleprescribing flexibilities for controlled substances. An extension will ensure continuity of care for the millions of patients and provide additional time to build a consensus that balances access and enforcement.

As you know, Community Health Centers are the best, most diverse, most innovative, and most resilient part of our nation's health system. For nearly sixty years, health centers have provided high-quality, comprehensive, affordable primary and preventive care, dental, behavioral health, pharmacy, vision, and other essential health services to America's most vulnerable, medically underserved patients in urban, rural, suburban, frontier, mountain, and island communities. Today, health centers serve nearly 32.5 million patients, or 1 in 10 individuals, at over 16,000 locations. This includes nearly 10 million or 1 in 7 rural residents, more than 29 million or 1 in 3 in poverty, and more than 5 million or 1 in 5 uninsured people.

Community Health Centers often provide comprehensive primary care services based on the whole person needs of patients and families, including dental, behavioral health, pharmacy services, and other "enabling" or support services that facilitate access to care for individuals and families in medically underserved communities, regardless of insurance status or ability to pay. NACHC maintains its role as the national voice for health centers and believes that high-quality primary health care is essential in creating healthy communities.

Telehealth and teleprescribing serve as a lifeline for health center patients, especially during the pandemic, where behavioral and mental health services were in high demand. This demand continues today; in 2023, substance use disorder services staff conducted nearly 400,000 telehealth visits with 306,367 health center patients.¹ Furthermore, health center patients have increasingly complex conditions, and teleprescribing is an important tool to address complex care needs. From 2013 to 2017, the percentage of health center patients diagnosed with substance use disorder grew

¹ <https://data.hrsa.gov/tools/data-reporting/program-data/national/table?tableName=5-SSDA&year=2023>



by 73%, and patients diagnosed with depression grew by 39%. Continuing these practices is crucial to sustaining access to treatment and addressing the ongoing healthcare challenges in underserved areas.

Health center patients, especially those who are uninsured, experience higher social drivers of health that impact accessing appropriate and timely care.² Patients' abilities to afford time off from work to see providers in person, access to transportation to/from said appointments, and find childcare to attend appointments all serve as potential barriers to meeting the in-person requirement. Furthermore, the rolling back of teleprescribing could affect and impact myriads of patients that health centers serve: older adults, patients who started on a controlled prescription during the pandemic and had subsequently become bedridden or homebound and unable to come to the clinic for care, people with disabilities, and people experiencing homelessness. Teleprescribing has been a critical tool to help bridge the care gap and reach health center patients where they are.

The Ryan Haight Online Pharmacy Consumer Protection Act of 2008 requires the DEA, in conjunction with the Secretary of HHS, to promulgate permanent rules to allow practitioners to prescribe certain controlled medications via telehealth through a special registration pathway. Last year, the DEA received almost 40,000 comments when they released draft rules to establish a permanent policy around the teleprescribing of controlled substances. As of this letter, the agency has not done so. Given how late we are in the year and with the waiver expiring on December 31, there is very little time left for the DEA to release a draft rule for public comment, close the comment period, review stakeholder feedback, and finalize the rule in time for the end of the year.

Again, we urge the Administration to work with the DEA and other relevant agencies to extend these prescribing flexibilities for two years while the DEA works to meet its congressional mandate to create a special registration pathway that continues access to care. An extension would prevent health center patients from losing access to care, while allowing additional time to reach consensus among the various stakeholders. Please do not hesitate to contact Elizabeth Linderbaum at elinderbaum@nachc.com to provide further information or help answer any questions. Thank you in advance for your consideration.

Sincerely,

Joe Dunn
Chief Policy Officer, Public Policy & Advocacy
National Association of Community Health Centers

² <https://www.kff.org/uninsured/issue-brief/key-facts-about-the-uninsured-population/>



Primary Care Associations and Health Center Controlled Networks

Alameda Health Consortium	Arizona Alliance for Community Health Centers
Association for Utah Community Health	CHCNet
Colorado Community Health Network	Community Health Care Association of New York State
Community Health Center Association of Connecticut (CHC/ACT)	Community Health Network of Washington
DC Primary Care Association	Florida Association of Community Health Centers
Georgia Primary Care Association	Health Center Association of Nebraska
Health Center Partners of Southern California	Illinois Primary Health Care Association
Iowa Primary Care Association	Illinois Primary Health Care Association (IPHCA)
Maine Primary Care Association	Massachusetts League of Community Health Centers
Michigan Primary Care Association	Mid-Atlantic Association of Community Health Center
Montana Primary Care Association	New Mexico Primary Care Association
Northwest Regional Primary Care Association	Ohio Association of Community Health Centers
Oklahoma Primary Care Association	Pennsylvania Association of Community Health Centers
Primary Care Development Corporation	Tennessee Primary Care Association
Texas Association of Community Health Centers	The CHC Alliance
Virginia Community Healthcare Association	Washington Association for Community Health
Wisconsin Primary Health Care Association	

Community Health Centers



Adelante Healthcare

Alcona Citizens for Health, Inc.

AltaMed Health Services Corporation

Altura Centers for Health

Ammonoosuc Community Health Services, Inc.

Amoskeag Health

Anchorage Neighborhood Health Center

Anthony L. Jordan Health Corporation

Aria Community Health Center

AtlantiCare Health Services - FQHC

Axis Community Health

Axis Health System

Bartz-Altadonna Community Health Center

Bay Area Community Health

Blue Ridge Health

Blue Sky Mental Health Access, Inc.

Brighter Beginnings

Brockton Neighborhood Health Center

Cabarrus Rowan Community Health Centers, Inc.

Canyonlands Community Health Care

Capitol City Family Health Center, Inc. dba
CareSouth

Careteam Plus, Inc.

Caring Hands Healthcare Center LLC

Cascadia Health

Center for Pan Asian Community Services /
COSMO Community Health Center

Central Counties Health Centers, Inc.

Centro De Servicios Primarios De Salud, Inc.

Chapa-De Indian Health

Charles River Community Health

Chase Brexton Health Care

Cherry Health

Chinatown Service Center

Christopher Greater Area Rural Health Planning
Corporation

Coalfield Health

Comanche County Hospital Authority

Community Health Association of Spokane

Community Health Care, Inc.

Community Health Center of Fort Dodge, Inc.

Community Health Centers of the Central Coast

Community Health Net

Community Health Partnership, Inc. of Santa Clara
and San Mateo Counties

Community Health Systems, Inc.



Compass Community Health
Crescent Community Health Center
Christopher Rural Health Planning Corporation (CRHPC)
Damian Family Care Centers, Inc.
Denver Health
Duffy Health Center, Inc.
East Central Oklahoma Family Health Center, Inc.
Eastern Shore Rural Health System, Inc.
Eisner Health
El Pueblo Health Services
Equitas Health
EXCELth Primary Health Care
Family Health Centers of San Diego
Family Health Services of Darke County, Inc.
Family Medical Center of Michigan, Inc.
G.A. Carmichael Family Health Center, Inc.
Greater Seacoast Community Health
Harmony Healthcare Long Island
Healthcare Network
HealthPoint
Holyoke Health Center, Inc.

Concilio de Salud Integral de Loíza, Inc.
Crescent City Pharmacy
Cross Timbers Health Clinics, Inc. dba AccelHealth
DAP Health
Doctor United Group, Inc.
East Arkansas Family Health Center
Eastern Iowa Health Center
Edward M. Kennedy Community Health Center
El Centro de Corazón
El Rio Health
Erie Family Health Centers
Family Health Centers
Family Health Network of Central New York, Inc.
Family HealthCare Network
Finger Lakes Community Health
Great Lakes Bay Health Centers
Hardin County Regional Health Center
Health and Life Organization, Inc. dba Sacramento Community Clinic
HealthFirst Bluegrass
HealthReach Community Health Centers
Hope Clinic



Horizon Health Care, Inc.

HPM Foundation, Inc.

Ingham Community Health Centers

Johnson Health Center

Keystone Rural Health Center

Kodiak Community Health Center

La Red Health Center

Lamprey Health Care

Lee County Cooperative Clinic

Longview Wellness Center, Inc. dba Wellness Pointe

Mariposa Community Health Center, Inc.

Multnomah County Community Health Center

MyCare Health Center

Neighborhood Health Center (NHC)

Neighborhood Improvement Project, Inc. dba Medical Associates Plus

NEPA Community Health Care

North Shore Community Health

Norwalk Community Health Center

Ocean Health Initiatives, Inc.

Open Door Health Center

Peak Vista Community Health Centers

Housing Works Health Services III, Inc.

Iberia Comprehensive Community Health Center

Intercare Community Health Network

Kentucky Mountain Health Alliance, Inc.

Kinston Community Health Center, Inc.

La Clinica de La Raza

Lake County Health Department

LCH Health and Community Services

LifeLong Medical Care

Los Angeles LGBT Center

Medical Associates Plus

Muskingum Valley Health Centers

Neighborhood Health

Neighborhood Healthcare

Neighborhood Outreach Access to Health

North Central Texas Community Health Care Center

Norwalk CHC

Nuestra Clinica del Valle, Inc.

Open Door Community Health Centers

Partnership Health Center

Peoples Community Health Clinic, Inc.



Petaluma Health Center, Inc.

Pillar Health

Primary Health Care, Inc.

PrimeCare Community Health

Project Health, Inc. dba Langley Health Services

Riggs Community Health Center

Rural Medical Services

Salud Integral en la Montana, Inc.

Sawtooth Mountain Clinic

Shenandoah Valley Medical System, Inc.

Southern Tier Community Health Center Network,
Inc. dba Universal Primary Care

Southwest Montana Community Health Center

Spring Branch Community Health Center

St. Vincent de Paul Village Family Health Center

Stephen F. Austin Community Health Center, dba
MYCHN

Suncoast Community Health Centers, Inc.

SWLA Center For Health Services

Tapestry 360 Health

Teche Action Clinic

The Wellness Plan Medical Centers

Tiburcio Vasquez Health Center (TVHC)

Piedmont Health Services, Inc.

Primary Care of Southwest Georgia

Primary Health Network

Prism Health North Texas

Pushmataha Family Medical Center

Roanoke Chowan Community Health Center

Sacopee Valley Health Center

San Ysidro Health

Shawnee Health

Shingletown Medical Center

Southern West Virginia Health System

Southwest Utah Community Health Center

St. Jude Neighborhood Health Centers

Stedman-Wade Health Services, Inc.

Stigler Health & Wellness Center, Inc.

Sunrise Clinics

Syracuse Community Health

Tarzana Treatment Centers, Inc.

The Chautauqa Center

The Wright Center for Community Health

Triangle Area Network, Inc.



Tri-Area Community Health

TrueCare

Union Community Health Center

Valle del Sol, Inc.

Waikiki Health

Westside Family Healthcare

Whitman-Walker Health Center

Tri-State Community Health Center

Tulip Tree Family Health Care

Unity Care Northwest

Vocational Instruction Project Community Services,
Inc. dba VIP Community Services

Westside Family Health Center

Wheeler Clinic

Yakima Valley Farm Workers Clinic