



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF AGING

November 20, 2024

Chairman George Bedwick
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: Final (with Proposed Omitted) Rulemaking: State Board of Medicine 16A-4962 (Opioid Treatment Programs)

Dear Chairman Bedwick and Commission Members,

On behalf of the over 3.4 million older adults the Pennsylvania Department of Aging (PDA) serves I am writing this letter of support for the State Board of Medicine final rulemaking submitted by the Pennsylvania Department of State (DOS). Approval of this regulatory package will ensure patients suffering from opioid use disorder can receive timely access to care through the inclusion of the Substance Abuse and Mental Health Services Administration's (SAMHSA) updated rules relating to the treatment of opioid use disorder.

In 2021-2022, SAMHSA released results from a comprehensive [National Surveys on Drug Use and Health](#), which focused on the behavioral health among older adults. Within this report, 7.1 million older adults were identified as having substance use disorder (SUD) (9.1%), including 4.4 million who had an alcohol use disorder (AUD) (5.6%) and 3.2 million who had a drug use disorder (DUD) (4.1%). SAMHSA reported that of the 8.5 million older adults who were categorized as needing substance use treatment in that year, fewer than 1 in 3 received it.

PDA heard concerns about access to opioid use treatment during the Aging Our Way, PA listening sessions. Aging Our Way, PA, is a 10-year multisector strategic plan to build more inclusive, supportive communities for older Pennsylvanians. The stakeholder engagement process was led by PDA and Pennsylvania's network of Area Agencies on Aging (AAAs) who held more than 200 listening sessions in their local communities across all 67 counties. During these conversations, older adults shared barriers they faced in accessing opioid use disorder treatment.

PDA administers the Caregiver Support Program (CSP) which provides resources and assistance to caregivers with the purpose of alleviating stress as well as enhancing their well-being and caregiving relationship. Through the CSP, caregivers are afforded the opportunity to receive vital supports and services such as care management, benefits counseling, caregiver education and training and financial reimbursement of approved, caregiving-related expenses. Eligible participants include grandparents and other older relative caregivers of children. During FY

SECRETARY OF AGING

555 Walnut Street, 5th Floor | Harrisburg, PA. 17101 | 717.783.1550 | aging.pa.gov

2022-2023 there were 939 grandparents/older relative caregivers enrolled in CSP caring for 1,323 children. Many of these grandparents/older relative caregivers are caring for children while their parent is seeking opioid use treatment. The approval of the telehealth physical examination standard will result in outcomes that will reduce harm by increasing and improving access to treatment and providing the opportunity to begin the road to recovery more effectively and efficiently.

The telemedicine physical examination standard for Opioid Treatment Programs will provide the opportunity to reduce stigma and increase access of treatment for older adults and their families and will begin to address some of the concerns PDA and AAAs heard at the local level and the familial challenges identified through the Caregiver Support Program. PDA recommends that the Independent Regulatory Review Commission approve the State Board of Medicine Opioid Treatment Program regulations as this proven safe and effective standard will better support and serve older adults and their families throughout Pennsylvania.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Kavulich". The signature is fluid and cursive, with a large initial "J" and "K".

Jason Kavulich
Secretary