

EMBARGOED MATERIAL

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HUMAN SERVICES

December 4, 2024

RECEIVED

DEC 04 2024

Pennsylvania Independent Regulatory Review Commission
333 Market St, 14th Floor
Harrisburg, PA 17101

Independent Regulatory
Review Commission

Re: Final Rulemaking, State Board of Medicine
16A-4962 Opioid Treatment Programs

The Pennsylvania Department of Human Services (DHS) supports the implementation of the regulatory changes included in this final rulemaking (16A-4962, Opioid Treatment Programs) by the State Board of Medicine.

This rulemaking amends the State Board of Medicine's regulations to allow the initial physical examination required for prescribing, administering and dispensing controlled substances to be conducted by means of telehealth for those patients being admitted into an Opioid Treatment Program (OTP) for treatment of opioid use disorder with either buprenorphine or methadone, provided that a health care provider determines that an adequate evaluation of the patient can be accomplished via telehealth with a full in-person physical examination subsequently completed within 14 days after admission to the OTP.

Telehealth offers numerous benefits in addressing the opioid overdose epidemic including increased access to care, continuity of care, convenience and privacy, comprehensive care, cost-effectiveness, enhanced patient engagement, access to crisis management, and data-driven approaches. Leveraging these advantages can play a crucial role in enhancing the quality, accessibility and effectiveness of opioid addiction treatment and overdose prevention.

DHS supports this effort by the State Board of Medicine to align state regulations with the recommendations made by SAMHSA and regulations already in place at the federal level.

Sincerely,

Valerie A. Arkoosh, MD, MPH
Secretary

OFFICE OF THE SECRETARY