

October 26, 2006

Michele M. Leonhart  
Deputy Administrator  
Drug Enforcement Administration  
2401 Jefferson Davis Highway  
Alexandria, VA 223301

Docket No. DEA- 286P - Dispensing Controlled Substances for the Treatment of Pain  
Issuance of Multiple Prescriptions for Schedule II Controlled  
Substances

Dear Administrator Leonhart,

The American Society for Pain Management Nurses applauds the Drug Enforcement Agency (DEA) for responding to the concerns of the American Society for Pain Management Nursing and the healthcare providers and patients who have been affected by the DEA's Interim Ruling. The policy statement, "Dispensing Controlled Substances for the Treatment of Pain" provides clarification and the reassurance that prescribing healthcare providers need to appropriately prescribe controlled substances for pain management. We additionally support the proposed rule, "Issuance of Multiple Prescriptions for Schedule II Controlled Substances." This rule will allow prescribing healthcare providers the ability to appropriately manage patients who are stable and have proven reliable in the management of their schedule II medications. We propose that most healthcare provider's have the ability to provide effective pain management within the standards of care set forth by evidenced based medicine and sound judgment. Removing the need to see each and every patient on a monthly basis will free up the pain management specialist's time allowing them to treat more patients thus improving access to appropriate pain care overall.

The American Society for Pain Management Nursing (ASPMN) is an organization of more than 2000 professional nurses whose core purpose is to promote optimal pain management. ASPMN is dedicated to advancing and promoting optimal nursing care for people affect by pain. As a membership we are committed to collaborating with the DEA and other regulatory agencies to ensure a balanced approach to reducing abuse and diversion of schedule II medications and preserving appropriate access to those same medications for patients who suffer with persistent pain.

Sincerely,

Jeri Davis, RN, BSN, MBA-HCM  
Chair, Government Relations & Advocacy  
American Society for Pain Management Nursing