



April 25, 2017

Sallie Debolt
Ohio State Medical Board
30 East Broad Street, 3rd floor
Columbus, OH 43215

Ms. Debolt:

Thank you for the opportunity to provide comments on draft amendments to OAC sections 4731-11-01 and 4731-11-02, and proposed new rule 4731-11-13 on behalf of the American College of Emergency Physicians, Ohio Chapter (Ohio ACEP). Ohio ACEP is a state medical specialty society representing emergency medicine (EM) with more than 1,500 emergency physician members. Ohio ACEP is committed to advancing emergency care through continuing education, research and public education, and assuring access to high quality emergency care for the people of Ohio.

Ohio ACEP and our emergency physician members have been on the front lines in the fight against the ongoing opiate epidemic. We see the effects of this devastating epidemic everyday and want to be proactive in the fight to reduce and eliminate opiate abuse in Ohio.

Our members have been promoters of the expanded access and use of the overdose drug Nalaxone. Ohio ACEP participated in developing and was an early endorser for the GCOAT guidelines for prescribing in the emergency department. Ohio ACEP developed and has been promoting an opiate education program, Nix Opiates, in Ohio schools.

We believe the data shows that there has been a significant reduction in opiate prescriptions in Ohio. We have heard from many of our members who have personally and institutionally reduced the number of prescriptions they write. However, there are still many instances in emergency departments where a prescription is appropriate for patients suffering acute pain from trauma or other injuries and conditions.

Ohio ACEP's position is that the proposed prescribing limits in 4731-11-13 which would limit prescription for adults to a 7-day supply and prescriptions for minors to a 5-day supply are in line with current emergency department practice. Placing these limits in the Ohio Administrative Code should not limit access to appropriate care in the emergency department.

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However, the addition of the provision that "In all circumstances where opioid analgesics are prescribed for acute pain: (b) The patient, or a minor's parent or guardian, shall be advised of the benefits and risks of the opioid analgesic, including the potential for addiction, and the advice shall be documented in the patient's medical record;" posed some questions from our members.

While we certainly see the benefit of such education, our members are not sure if in the emergency department is the most efficient place for that to be delivered.

We would suggest that a more appropriate place for a patient to receive that information is at the pharmacy. When a patient fills a prescription they already are required to sign a statement that they received information on the prescription. It shouldn't be overly burdensome to add a signature for the patient to acknowledge the addictive natural of opiate medication.

Additionally, Ohio ACEP would recommend the State Medical Board develop and produce a pamphlet to be used in the emergency department and other settings regarding the addictive natural of opiates. This would ensure patients are receiving a consistent message. Ohio ACEP would be happy to assist in the creation of that document. This would also help physicians in a high volume, fast paced environment, like the emergency department, efficiently provide patients with important information.

Ohio ACEP thanks you for your consideration of these comments. We certainly welcome an opportunity for continued dialogue. Our physician members stand ready to work with Board of Pharmacy and other regulatory entities to proactively address this opiate crisis. Should you be interested in visiting an emergency department to get a better understanding of our practice environment, our members would certainly be willing to accommodate that request.

Sincerely,



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Ohio ACEP President

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