



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

November 7, 2012

The Honorable Tom Harkin
Chairman
Committee on Health, Education, Labor and Pensions
United States Senate
Washington, DC 20510

Dear Senator Harkin:

The patient and health professional groups listed below are committed to partnering with law enforcement agencies, policymakers, and others to work on viable strategies to solve the problems of prescription drug diversion and abuse. Although numerous groups and state and federal entities are working to reduce these problems, success remains difficult to achieve.

One challenge is that many of these groups and entities are not working in a coordinated manner. To overcome this challenge, the undersigned groups urge Congress to create a commission or advisory group to bring together all stakeholders to address the problems of prescription drug diversion and abuse. The activities and recommendations of the advisory group should be broad in scope; however the recommendations should include specific direction for federal agencies to carry out. Most importantly, there should be an agreement from all participants to support this collaborative result.

There are a number of potential conveners that Congress could utilize for this purpose, including a Federal Advisory Committee Act (FACA) compliant advisory committee to the Department of Health and Human Services (HHS), a Congressional Advisory Body, a think tank whose activities could be overseen by HHS, or a public/private advisory body with which Congress could direct federal agencies to work.

The policy areas to be covered are numerous and varied; however there should be a focus on policy solutions that will achieve the goals of reducing prescription drug diversion and abuse without negatively impacting legitimate patient access and care. While appropriate policies must empower law enforcement officials to act aggressively against individuals and entities actually engaging in diversion or abuse, diversion/abuse control actions must be balanced against the needs of healthcare providers to provide care to legitimate patients. We must ensure that legitimate patients receive critical medicines without interruption.

Due to the urgent nature of the problems associated with prescription drug diversion and abuse, the advisory group's recommendations should be provided to Congress within one year of its creation or enactment.

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Again, please support this critical approach to reduce the problems of prescription diversion and abuse and any efforts to include it in end-of-the-year, must-pass legislation. We thank you for consideration of our concerns.

Sincerely,

American Academy of Pain Management
American Society for Pain Management Nursing (ASPMN)
Center for Practical Bioethics
Inflexxion, Inc.
International Nurses Society on Addictions (IntNSA)
Jan Favero Chambers, President and Founder
National Fibromyalgia & Chronic Pain Association
National Association of Chain Drug Stores (NACDS)
National Association of Directors of Nursing Administration Long Term Care, Inc.
Pain Treatment Topics
Paul Arnstein RN, PhD, FAAN, Connell Nursing Research Scholar, Clinical Nurse
Specialist for Pain Relief
Purdue Pharma
US Pain Foundation
Virginia Cancer Pain Initiative