



National Association of State Controlled Substances Authorities

276 SW Lake Forest Way, Port St. Lucie, FL 34986 - Phone: (617) 347-1455 - [www.nascsa.org](http://www.nascsa.org)

April 4, 2022

Janet Woodcock, M.D.  
Acting Commissioner  
US Food and Drug Administration  
U.S. Department of Health and Human Services  
10903 New Hampshire Avenue  
Silver Springs, MD 20993

RE: Docket FDA-2022-P-0149

Dear Dr. Woodcock:

I am writing on behalf of The National Association of State Controlled Substances Authorities (NASCSA) related to a recent Citizens Petition filed by Public Citizen requesting that gabapentin and gabapentin encacarbil be placed in Schedule V federally.

NASCSA is a 501(C)(3) that was established in 1985 representing 48 member states. NASCSA members include Boards of Pharmacy, Departments of Health, Public Protection Agencies, and State Controlled Substance Enforcement Agencies and was created to provide a continuing mechanism through which states, federal agencies and others can work to increase the effectiveness and efficiency of state and national efforts to prevent prescription drug abuse.

I wanted to share with you the results of a recent survey of our members related to this issue. While not scientific, 64% of respondents indicated that gabapentin and gabapentin encacarbil drugs are a concern in their state and 82% of the respondents supported the placement of these drugs into Schedule V federally. I have attached for your review the results of this survey.

Thank you for your consideration. Should you have any additional questions I can be reached at 617-347-1455.

Respectfully submitted,

A handwritten signature in black ink that reads "Katherine Keough". The signature is written in a cursive, flowing style.

Katherine Keough  
Executive Director

Cc: Anne Milgram, Administrator, US. Drug Enforcement Administration



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**Survey Results - Citizens Petition to Schedule Gabapentin and Gabapentin Enacarbil**

CHECKBOXES

Does your state schedule gabapentin and gabapentin enacarbil?

Answer Choice	0%	100%	Number of Responses	Responses Ratio
Yes			12	20%
No			48	80%
I don't know			0	0%
<b>Total Responses</b>			<b>60</b>	<b>100%</b>

CHECKBOXES

2. Does your state utilize the Prescription Monitoring Program to monitor prescribing and dispensing of gabapentin and gabapentin enacarbil?

Answer Choice	0%	100%	Number of Responses	Responses Ratio
Yes			29	48%
No			30	50%
I don't know			1	1%
<b>Total Responses</b>			<b>60</b>	<b>100%</b>

CHECKBOXES

3. Are gabapentin and gabapentin enacarbil drugs of concern in your state?

Answer Choice	0%	100%	Number of Responses	Responses Ratio
Yes			38	64%
No			21	35%
<b>Total Responses</b>			<b>59</b>	<b>100%</b>

OPEN QUESTION

Comment (Question 3 continued)

Yes but we need to proceed with extreme caution because this medication is critical to the treatment of many conditions and this could have unintended consequences.

We see gabapentinoids frequently in the NC Office of the Chief Medical Examiner as part of routine toxicological testing in both illicit drug overdose cases and prescription drug overdose cases. I am concerned when taken in combination with opioids.

Not that I have been made aware of.

**20 Response(s)**



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CHECKBOXES

4. Do you support the placement of gabapentin and gabapentin enacarbil as a Schedule V Controlled Substance federally?

Answer Choice	0%	100%	Number of Responses	Responses Ratio
Yes			47	82%
No			10	17%
<b>Total Responses</b>			<b>57</b>	<b>100%</b>

CHECKBOXES

5. Do you recommend that NASCSA provide the results of this survey to the Food & Drug Administration (FDA) and other agencies?

Answer Choice	0%	100%	Number of Responses	Responses Ratio
Yes			57	95%
No			3	5%
<b>Total Responses</b>			<b>60</b>	<b>100%</b>

## Constant Contact Survey Results

**Campaign Name:** Citizens Petition to Schedule Gabapentin and Gabapentin Enacarbil

**Survey Starts:** 157

**Survey Submits:** 61

**Export Date:** 03/30/2022 12:07 PM

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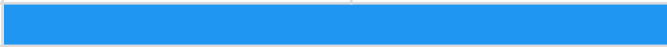

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