



National Association of State  
Controlled Substances Authorities

**NASCSA Resolution 2019-01  
October 2019  
Richmond, VA**

**A RESOLUTION ENCOURAGING THE SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES ADMINISTRATION TO ALLOW OPIOID TREATMENT PROGRAMS TO DISCLOSE DISPENSING DATA TO STATE PRESCRIPTION DRUG MONITORING PROGRAMS**

**WHEREAS**, Use of Prescription Drug Monitoring Program (PDMP) information assists prescribers and dispensers to make informed treatment and dispensing decisions; and

**WHEREAS**, patient safety is of paramount importance, and many drugs dispensed by opioid treatment programs (OTPs) could have life-threatening and even deadly consequences if not properly coordinated with those prescribed and dispensed outside of OTPs; and

**WHEREAS**, PDMPs are more effective healthcare tools when they include all available controlled substance dispensing information for all patients; and

**WHEREAS**, the Department of Health and Human Services is accepting comments regarding changes to the Confidentiality of Substance Use Disorder Patient Record regulations until 5 p.m. on October 25, 2019.

**THEREFORE, BE IT RESOLVED**, that the National Association of State Controlled Substances Authorities (NASCSA) strongly encourages the Substance Abuse and Mental Health Services Administration (SAMHSA) to amend § 2.36 to 42 CFR Part 2 permitting opioid treatment programs (OTPs) to disclose dispensing data with no requirement for patient consent, as required by applicable state law, to PDMPs.

**THEREFORE, BE IT RESOLVED**, that NASCSA submit this resolution by 5 p.m. on October 25, 2019 in support of the aforementioned proposed changes to the Confidentiality of Substance Use Disorder Patient Record regulations.

ATTEST: October 24, 2019

President

Date: Barbara Q. Carter