



Kentucky Society of Addiction Medicine

A Chapter of American Society of Addiction Medicine

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July 26, 2024

Michael Rodman
Executive Director
Kentucky Board of Medical Licensure
310 Whittington Parkway
Suite 1B
Louisville, KY 40222

RE: Request of KBML to Stop the Current Workgroup's Efforts to Propose Changes to 201 KAR 9:270 and to Establish a New Workgroup to Review the Regulation
ENCL: December 5, 2023 Letter to KBML

Dear Executive Director Rodman:

On behalf of the Kentucky Society of Addiction Medicine (KYSAM), we write to acknowledge receipt of your letter dated June 4, 2024, regarding the review of, and proposed amendments to, 201 KAR 9:270. Although KYSAM appreciates the Kentucky Board of Medical Licensure (KBML)'s willingness to update these regulations, we are deeply disappointed and concerned by your workgroup's proposed amendments which do not reflect appropriate clinical guidelines and were crafted without the input of a variety of Kentucky physicians who are treating patients for opioid use disorder (OUD). **Accordingly, KYSAM recommends that KBML immediately stop the current workgroup's efforts to propose changes to 201 KAR 9:270 and establish a new workgroup charged with reviewing the regulation and making recommendations to KBML through an open and transparent process.**

In December 2023, KYSAM sent a letter to KBML (enclosed) requesting a review of 201 KAR 9:270. KYSAM's letter highlighted several specific sections of the regulation for revision in the absence of a wholesale update. The requested revisions included sections on licensee qualifications to prescribe medications for OUD, appropriate treatment of OUD in pregnant patients, dosage limits on buprenorphine, patient visit frequency, concomitant prescribing, and other treatment limitations. Unfortunately, your workgroup's proposal fails to address many of these areas of concern and creates new areas of concern that are inconsistent with appropriate clinical care for patients with OUD.


It is now imperative that 201 KAR 9:270 align with rapidly evolving clinical considerations in the treatment of OUD and the desperate need to expand access to individualized, patient-centered care at a time of record overdose deaths. **Ultimately, we must ensure that lifesaving treatments are available to all Kentuckians in need and that physicians are empowered to treat OUD without being hampered by a flawed regulation.**

To that end, our members stand ready and willing to participate in a new workgroup charged with reviewing 201 KAR 9:270. We respectfully request that you keep KYSAM's current leadership informed as this process progresses. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colleen Ryan'.

Colleen Ryan, MD, FASAM
President-Elect, Kentucky Society of Addiction Medicine

A handwritten signature in black ink, appearing to read 'Brian Hurley, MD'.

Brian Hurley, MD, MBA, FAPA, DFASAM
President, American Society of Addiction Medicine

CC: William C. Thornbury, MD, Chair
Leanne Diakov, General Counsel

