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Ms. Marilyn Tavenner
Administrator
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

September 12, 2014

Dear Ms. Tavenner:

The American Academy of Pain Medicine (AAPM) is writing in support of a local coverage determination (LCD) regarding the testing of drugs of abuse. Urine drug testing (UDT) is one of the tools used to monitor appropriate compliance with a treatment plan that includes controlled substances.

Patients treated by Pain Medicine physicians have serious, medically complex conditions such as substance abuse disorders and chronic pain. The challenges of treating these conditions are often exacerbated by other factors, including age and prevalence of other chronic conditions and/or disabilities. It is therefore critical that physicians have actionable, clinical information to ensure that controlled substances are prescribed safely. Therapeutic success depends, in part, on precise patient adherence to the treatment regimen.

UDT, used in conjunction with other monitoring measures, plays an important role in helping providers accomplish therapeutic success and reduction of societal harm. UDT results are used to verify compliance/adherence to prescribed therapy, identify the use of undisclosed drugs, discourage drug misuse, and identify patients with abuse/addiction problems. Urine testing is important because of the ease of collection, the speed of turn-around, and accessibility of laboratories that provide the testing.

Comprehensive definitive testing needs to be available to ensure that medically appropriate care is provided to patients. AAPM urges CMS to work towards the development of a final coverage determination policy that focuses on maintaining the ability of physicians to choose comprehensive definitive testing of parent drugs and metabolites.

Respectfully submitted,

A handwritten signature in black ink that reads "Sean Mackey". The signature is written in a cursive style with a large, looping 'S' and 'M'.

Sean Mackey, MD, PhD
AAPM President