April 11, 2018

The Honorable Lamar Alexander
Chairman
Senate Health, Labor, Education & Pensions Committee
428 Senate Dirksen Office Building
Washington, DC 20510

RE: The Opioid Crisis Response Act of 2018

Dear Chairman Alexander,

The American Association of Colleges of Nursing (AACN) offers the following comments in response to the draft legislation, The Opioid Crisis Response Act of 2018, proposed by the Senate Health, Labor, Education & Pensions Committee on April 4, 2018. As the national voice for academic nursing, AACN has a vested interest in improving the nation’s health and health care. For nearly five decades, AACN has established quality standards for professional nursing education to ensure that the workforce of registered nurses and Advanced Practice Registered Nurses (APRNs; including nurse practitioners (NPs), certified nurse-midwives (CNMs), certified registered nurse anesthetists (CRNAs), and clinical nurse specialists (CNSs)) are prepared to provide quality, cost-effective, and evidence-based care.

AACN is acutely aware of the impact the opioid crisis has on American communities and the increasing annual toll of lives taken and families devastated. The far-reaching impact of the opioid epidemic indiscriminately affects both rural and urban populations. Approximately 115 people die daily from opioid overdoses resulting in a healthcare epidemic that needs to be solved through multiple approaches as efficiently as possible. The nursing profession, partnering with our interprofessional colleagues, is on the front lines of the epidemic. From researching new approaches to prevention and treatment to disseminating best practices to clinicians providing direct care, nursing experts continue to demonstrate their commitment to helping individuals and families impacted by opioid abuse and misuse.

The collaboration needed to ensure optimal plans of care, including identification, prevention, and treatment, requires the expertise of all providers. Our comments specifically reference the need to incorporate all APRN roles and providers in the solution. Within AACN member schools, there are approximately 95,000 students enrolled in APRN programs who will graduate to become the next generation of providers. Within the current workforce, there are approximately 381,000 APRNs in the United States, which includes 248,000 NPs, 70,000 CNSs—many of whom work in behavioral health, 52,000 CRNAs—many of whom manage chronic and acute pain, and 11,000 CNMs—many of whom could treat opioid-dependent mothers and infants with fetal abstinence syndrome.

Section 303 of the Comprehensive Addiction and Recovery (CARA) Act [Public Law 114-198] allows NPs and Physician Assistants to prescribe Medication Assisted Treatment (MAT), which combines medication and behavioral therapy that research indicates can successfully treat these disorders. Expanding upon CARA, Senators Ed Markey (D-MA), Rand Paul (R-KY), Maggie Hassan (D-NH), and Susan Collins (R-ME) introduced the Addiction Treatment Access Improvement Act (S. 2317) which amends the Controlled Substances Act (21 U.S.C. 823 (g)(2)(G)) to allow all four APRNs to use their clinical training and expertise to provide care to those suffering from opioid addictions. Representatives Paul Tonko (D-NY) and Ben Ray Lujan (D-NM) introduced the companion legislation (H.R. 3692). Additionally, CARA 2.0 also includes a similar provision to allow all APRNs to prescribe MAT. The multitude of bipartisan legislation that has been introduced on this specific and viable solution highlights how vital the nursing profession is to significantly impacting prevention and treatment options in communities and to removing barriers to access of care.

The White House’s Council of Economic Advisors estimates that the toll of the opioid crisis in 2015 was a shocking $504 billion. This report took into consideration the costs of patient treatment, lost productivity, and the criminal justice system. However, the report did not include all factors related to the crisis, making it difficult to calculate the true cost. AACN certainly appreciates the fiscal constraints of the federal government and therefore applauds investments in the opioid epidemic made by Congress. At the same time, your committee has recognized the work is not complete and more must be done. AACN believes additional investments in providers and preventative measures will create savings in the health system, save lives in the long run, and provide a substantial return on investment for taxpayers in every community.

AACN respectfully requests that the committee expand Section 303 of the Comprehensive Addiction and Recovery (CARA) Act [Public Law 114-198] to include all four APRN roles to address this national crisis in The Opioid Crisis Response Act of 2018.

Thank you for your consideration of these comments. Please consider AACN an ally in this endeavor. If our organization can be of any assistance, please contact Director of Policy, Colleen Leners at cleners@aacnnursing.org.

Sincerely,

Ann E. Cary, PhD, MPH, RN, FNAP, FAAN
AACN Board Chair

Deborah E. Trautman, PhD, RN, FAAN
President and Chief Executive Officer

---

Cc: The Honorable Patty Murray
    The Honorable Michael Enzi
    The Honorable Bernie Sanders
    The Honorable Richard Burr
    The Honorable Robert Casey Jr.
    The Honorable Johnny Isakson
    The Honorable Michael Bennet
    The Honorable Rand Paul
    The Honorable Tammy Baldwin
    The Honorable Susan Collins
    The Honorable Christopher Murphy
    The Honorable Bill Cassidy
    The Honorable Elizabeth Warren
    The Honorable Todd Young
    The Honorable Tim Kaine
    The Honorable Orrin Hatch
    The Honorable Maggie Hassan
    The Honorable Pat Roberts
    The Honorable Tina Smith
    The Honorable Lisa Murkowski
    The Honorable Doug Jones
    The Honorable Tim Scott