

January 28, 2021

Regina LaBelle
Acting Director, Office of National Drug Control Policy
Executive Office of President Joseph Biden
Washington, DC

Dear Acting Director LaBelle,

We write to you with deep concern regarding the Biden Administration's intent to roll back a recent improvement to expand buprenorphine access - a lifesaving, evidence-based substance use treatment - at a time when overdose deaths have reached record highs in the country. In early January, [HHS within the Trump Administration](#) issued guidance to exempt physicians from the additional training requirement for prescribing buprenorphine. We are very disappointed to hear that the [Biden Administration is looking to roll this improvement back](#). As many of us worked tirelessly with our community to elect President Biden, it is disheartening and deeply alarming that this is the President's first action taken related to the overdose crisis.

As stakeholders that represent people who use drugs, people in recovery and family members impacted by overdose, we want to reiterate that buprenorphine and methadone have long been demonstrated to be the gold-standard for opioid use disorder treatment. [As overdose rates skyrocket in the midst of the COVID-19 pandemic](#), restricting access to this proven substance use disorder treatment by re-imposing burdensome and unnecessary barriers will only hinder our ability to slow the exacerbating crisis.

People with a substance use disorder are more likely to contract COVID-19 than those without, but the [risk is greater](#) for people with an opioid use disorder. Moreover, Black individuals with opioid use disorder are [over four times](#) more likely to develop COVID-19, compared to white people with opioid use disorders. Not only is the Black community dying from overdose and COVID-19 at substantially [higher rates](#) than white people, but access to buprenorphine is steeped in racial disparities. Black patients continue to be [less likely to be inducted](#) and prescribed this life saving medication than white patients. **As President Biden works to ground his term in racial equity and justice, removing the X Waiver in order to expand access to MAT is a key component of racial justice in the context of the overdose crisis.**

Since President Biden appears committed to take leadership to heal our country, we urge that he does not forget the heartbreak the overdose crisis has caused in our communities for

over a decade. We are asking that the Biden Administration take bold leadership in addressing the overdose crisis by trusting the science and expanding access to proven interventions like buprenorphine. **We ask that rather than roll back the celebrated guidance, the Administration builds off of the guidance released in early January and prioritizes removing the X Waiver entirely for all prescribers.** This would enable nurse practitioners and physicians assistants—roles that disproportionately serve BIPOC and rural populations—to also benefit from the increased flexibility.

If there are legal concerns in the guidance issued by HHS, President Biden’s Administration must prioritize passing the **Mainstreaming Addiction Treatment (MAT) Act** in the first 100 days - which eliminates the redundant and outdated requirement that practitioners apply for an X Waiver through the Drug Enforcement Administration to prescribe buprenorphine for the treatment of substance use disorder. ([H.R. 2482 | S. 2074](#)).

We cannot wait another minute to address the historic deaths and harm the failed and outdated policies have caused in our nation. The time for urgent, bold change is now.

Sincerely,

A New PATH (Parents for Addiction Treatment & Healing)
ACCESS
Access Support Network
Access Supporting Voter
Addiction Medicine Interest Group at The University of New Mexico
AIDS United
Any Positive Change Inc.
Archstone Behavioral Health
Baltimore Harm Reduction Coalition
Being Alive - LA
Beyond the Pod
Bienestar Human Services
Broken No More
CARMAhealth
CCPR
Center for Disability Rights
Center for Living and Learning
Center for Optimal Living
Center for Popular Democracy
Central Texas Harm Reduction Alliance
Challenges Inc
Chicagoland Leadership Council
Clare Matrix

Collective Care
Community Legal Services in East Palo Alto
CURE IL
DanceSafe
Daniel Carl Torsch foundation
Dave Purchase Project
District Health Department 4
Down Home NC
Drug Policy Alliance
Drug Policy Forum of Hawaii
End AIDS Now & Let's Kick Ass NY
End Hep C SF
End SUD
Exceptional Minds
Faith in Harm Reduction
Faith In Public Life
Families for Sensible Drug Policy
Fayetteville PACT
FED UP! Coalition
Friends of Safehouse
Full Circle Recovery Center
GLIDE
Harlem United
Harm Reduction Action Center

Harm Reduction Caucus at Columbia
University School of Social Work
Harm Reduction Coalition of Santa Cruz
County
Harm Reduction Michigan
Harm Reduction Ohio
Harm Reduction Project
Harm Reduction Sisters
Hawaii Health & Harm Reduction Center
Healing Grove Health Center
Health & Medicine Policy Research Group
Health Equity Alliance
Health in Justice Action Lab, Northeastern
University
Healthy Rhythm Consulting Agency
Heartland Alliance
Hearts on a Wire
Help Not Handcuffs, Inc.
Hepatitis C Mentor and Support
Group-HCMMSG
Hepatitis Education Project
HIPS
Hoosier Action
Housing Works
Humboldt Area Center for Harm
Reduction (HACHR)
Hyacinth Foundation.
Illinois Academy of Family Physicians
Illinois Psychiatric Society
Illinois Society of Addiction Medicine
Indiana Recovery Alliance
Intercambios Puerto Rico, Inc.
Jackson Harm Reduction
Joanne Clark
K12 Health
Keenan Consulting
LA Community Health Project
Latino Action Network
Law Enforcement Action Partnership
Live4Lali
Maine Access Points
Maine Drug Policy Lab at Colby College
Maine Harm Reduction Consulting
Maine People's Alliance
Memorial Behavioral Health
Mercy Medical Center, Springfield MA

Michael Galipeau Consulting
Michigan Moms United
Michigan United
Minnesota Doctors for Health Equity
Mountain Top Cares Coalition
Movement for Family Power
Movement for People's Democracy WV
Musicians For Overdose Prevention
NAMI Barrington Area
NASTAD
National Advocates for Pregnant Women
National Alliance for HIV Education and
Workforce Development
National Association of Social Workers
National Center for Advocacy and
Recovery for Behavioral Health
National Council on Alcoholism and Drug
Dependence- Maryland Chapter
National Harm Reduction Coalition
National Health Care for the Homeless
Council
National Hepatitis Corrections Network
National Viral Hepatitis Roundtable
NC AIDS Action Network
Needle Exchange Emergency Distribution
(NEED)
NEU Health Solutions, Inc.
New Jersey Harm Reduction Coalition
New Jersey Organizing Project
New Jersey Policy Perspective
New Jersey Reentry Corp
New York Harm Reduction Educators
Newark Community Street Team
NEXT Harm Reduction
North Carolina Council of Churches
North Carolina Harm Reduction Coalition
North Carolina Survivors Union
Northern Valley Harm Reduction Coalition
Ohio Transformation Fund
Oklahoma Harm Reduction Alliance
One Voice Recovery Inc
Onestop Harm Reducation Center
Open Aid Alliance
Our Sacred Circles
Our Wellness Collective

P.A.I.N. (Prescription Addiction Intervention Now)
 Partnership to End AIDS Status, Inc
 PCC Community Wellness
 People's Action
 Philadelphia Overdose Prevention Network (POPNI)
 Physicians for Responsible Opioid Prescribing
 Preventing Overdose and Naloxone Intervention (PONI)
 Prevention Point Pittsburgh
 Progressive Maryland
 Project HOME Healthcare Service
 Project Safe Point
 Provide, Inc.
 Public Citizen
 Punks With Lunch Lansing
 RecoveryATX
 Reproductive Health Access Project
 Resolute Pain Solutions
 Rights & Democracy
 River Valley Organizing / Unharming Ohio
 Rural AIDS Action Network
 Safe Haven Harm Reduction
 Saint Augustine Harm Reduction Collective
 Second Chances Recovery Homes
 Self-Medicating
 SFDPH
 Showing Up for Racial Justice Ohio
 Sierra Harm Reduction Coalition
 Smoky Mountain Harm Reduction
 Solutions Oriented Addiction Response
 Sonoran Prevention Works
 South Jersey AIDS Alliance
 Southern West Virginia Harm Reduction
 Southside Harm Reduction Services
 Southwest Recovery Alliance
 St. Ann's Corner of Harm Reduction, Inc.
 Starting Point Behavioral healthcare
 Steady Collective
 StoptheDrugWar.org
 Students for Sensible Drug Policy
 Substance Use Policy, Education, and Recovery PAC
 Suncoast Harm Reduction Project.
 Tapestry Health
 Tennessee Justice Center
 Texas Harm Reduction Alliance
 The Buprenorphine Telehealth Consortium
 The Grand Rapids Red Project
 The Levenson Foundation
 The Lieving Group, LLC
 The Mountain Center
 The Never Alone Project
 The People's Harm Reduction Alliance
 The Porchlight Collective, SAP
 The Sidewalk Project
 The Southern Tier AIDS Program
 Thresholds
 Time2Bloom Recovery Resources
 Transforming Reentry Services/MWIPM
 Urban Survivor's Union
 VICTA
 Virginia Harm Reduction Coalition
 VOCAL-NY
 VOCAL-WA
 Washington Heights Corner Project
 Women With A Vision