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February 10, 2021

Governor Andrew Cuomo, Chair  
Governor Asa Hutchinson, Vice Chair  
National Governors Association  
444 N. Capitol Street, NW Suite 267  
Washington, DC 20001

RE: COVID-19 Vaccine Distribution to Opioid Treatment Programs

Dear Governors Cuomo and Hutchinson,

I am writing on behalf of the American Association for the Treatment of Opioid Dependence, which represents Opioid Treatment Programs (OTPs) throughout the United States. There are 1,700 OTPs in the United States, providing comprehensive treatment to more than 450,000 patients with Opioid Use Disorder (OUD) every day. The former Assistant Secretary of Health and Human Services wrote a letter to me on March 25, 2020 (see attached), indicating that Opioid Treatment Programs were “essential medical services”. The letter was written so that OTPs would get access to Personal Protective Equipment (PPE).

I am also attaching the letter dated April 23, 2020 as authored by Jim Carroll, Director of the White House Office of National Drug Control Policy. As you will note in reading the letter, Mr. Carroll indicated that “SUD is an essential medical service, and PPE ordered and requested by facilities treating SUD is for a legitimate need and purpose”.

My colleagues and I are asking you to encourage governors to ensure that Opioid Treatment Programs are included in the first round of COVID-19 vaccination distribution since they employ essential medical personnel on the front lines providing daily in-person patient contact as well as admission physical examinations for treating Opioid Use Disorder.


We are also recommending that these treatment programs, which operate under the oversight of the Substance Abuse and Mental Health Services Administration (SAMHSA) in addition to the State Opioid Treatment Authorities, get access to COVID-19 vaccinations in order to inoculate their patients. The patients, who are treated in the OTPs, represent a vulnerable population, many aging with medical co-morbidities. It is understood that not every OTP may opt to vaccinate their patients based on state rules or other operating requirements but they should have the option to do so.



As you know, the COVID-19 pandemic has exacerbated the opioid epidemic in the United States as evidenced by the record number of overdose deaths in 2020 (59,069), which have been reported through June 30, 2020, representing more than a 25% increase above June 30, 2019. This makes it even more critical to ensure continued, uninterrupted access to evidence-based treatment for people with Opioid Use Disorder.

Thank you for considering this urgent request and please let me know if you have any questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Mark W. Parrino', with a small dot at the end.

Mark W. Parrino MPA  
President



Substance Abuse and Mental Health  
Services Administration

5600 Fishers Lane • Rockville, MD 20857

www.samhsa.gov • 1-877-SAMHSA-7 (1-877-726-4727)



March 25, 2020

Mr. Mark W. Parrino, M.P.A.  
President  
American Association for the Treatment  
of Opioid Dependence, Inc.  
225 Varick Street, Suite 402  
New York, NY 10014

Dear Mr. Parrino:

Thank you for the work you and your organization continue to do on behalf of millions of Americans living with opioid use disorders (OUDs). During this time, it is critical that these individuals continue to get the care and treatment they need.

A significant portion of this care will be provided in opioid treatment programs (OTPs). This care will often require physical contact and examination of patients performed by health care professionals. This letter is to certify agreement of the Substance Abuse and Mental Health Services Administration (SAMHSA) that the services provided in OTPs across the country are essential medical services.

Because of the nature of these services, many professionals providing them may require the use of personal protective equipment, such as masks, gloves, or gowns. This letter serves as confirmation from SAMHSA that the ordering of such supplies by OTPs is for a legitimate need and purpose.

Thank you again for your continued work for this population.

Sincerely,

Elinore F. McCance-Katz, M.D., Ph.D.  
Assistant Secretary for Mental Health  
and Substance Use



**EXECUTIVE OFFICE OF THE PRESIDENT**  
**OFFICE OF NATIONAL DRUG CONTROL POLICY**  
Washington, D.C. 20503

April 23, 2020

Dear Colleagues:

As the country continues its battle against COVID-19, I am encouraged and inspired, not only by the efforts of all of our healthcare workers who are helping confront this pandemic, but also for those individuals dedicated to maintaining high-quality care for non-coronavirus patients. I write to you today on behalf of some of those individuals, specifically millions of Americans living with Substance Use Disorder (SUD), and those caring for them.

During these uncertain times, it is important that we not lose sight of the very vulnerable population suffering from SUDs. This pandemic has affected every aspect of our lives and our healthcare system. It is critical that those undergoing treatment for SUD continue their treatment, and it is critical that the healthcare professionals who provide this care are able to continue to do so during this time. We are working through many different avenues of communication to ensure that these crucial services remain available.

The White House Office of National Drug Control Policy is already supporting emergency Federal exemptions to increase access and use of telemedicine in the treatment of SUD during the COVID-19 pandemic; but we know that in-person patient/provider interactions will inevitably occur. Treatment providers and all others associated with maintaining this vital sector of healthcare serve in a critical capacity and will require personal protective equipment (PPE) during unavoidable face-to-face patient interactions. In line with guidance previously issued, President Trump's position is that the treatment of SUD is an essential medical service, and PPE ordered and requested by facilities treating SUD is for a legitimate need and purpose.

The Trump Administration applauds those who are serving these patients on the front line; their dedication is overwhelmingly heartening. I trust that this letter serves as my endorsement that they too need to be protected during these trying times.

Sincerely,

A handwritten signature in black ink that reads "James Carroll". The signature is written in a cursive, flowing style.

James W. Carroll  
Director