



American Society of
Anesthesiologists[®]

July 8, 2022

The Honorable Pete Sessions
United States House of Representatives
Washington, DC 20515

Dear Representative Sessions:

On behalf of the American Society of Anesthesiologists (ASA) and our 55,000 members, I wish to express our support for H.R. 7259, the “Medical Controlled Substances Transportation Act of 2022.” We recognize your efforts to enable physicians, including office-based anesthesiologists, the ability to transport controlled substances safely and legally. This legislation represents an important step forward in providing physicians with the guidance to give their patients the best quality of care when traveling between practice locations, including across state lines.

Traveling with controlled substances is vital for office-based anesthesiologists to administer medications at multiple practice locations and across state lines. Physicians need to transport controlled substances to locations beyond where they maintain their DEA registration in order to perform certain procedures and treat their patients. Pain medicine specialists also travel to refill intrathecal pumps for chronic pain and cancer patients. Current DEA regulations require that a separate registration be obtained for each principal place of business or professional practice where controlled substances are manufactured, distributed, or dispensed but also provide for exceptions. The application of this rule and its exception have created confusion among physicians traveling with controlled substances and when separate registration is necessary. HR 7259 offers some clarity and much needed guidance for those traveling with controlled substances.

As you know, the bill requires practitioners to return any amount of the transported substance to inventory which was not administered at the end of a 72-hour period. This provision eliminates the need to keep large volumes of medication on-site and significantly reduces drug waste and diversion.

The bill recognizes that anesthesiologists are *administering* controlled substances to patients, not dispensing them. We appreciate this provision, as it clarifies the role of anesthesiologists in providing patient care. The Medical Controlled Substances Transportation Act grants physicians the ability to efficiently administer controlled substances while prioritizing patient safety and access to necessary care.

Thank you for the role you’ve played in the introduction of the Medical Controlled Substances Transportation Act. ASA is grateful that you have dedicated your attention to this policy which would advance the safe practice of anesthesiology.

Sincerely,

Randall M. Clark, MD, FASA
President
American Society of Anesthesiologists