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Dr. Chuck Rosenberg
Acting Administrator, Drug Enforcement Agency
8701 Morrisette Drive
Springfield, Virginia 22152

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Dear Dr. Rosenberg,

My name is Dr. Jeffrey Fudin. I currently practice as a Clinical Pharmacy Specialist in an outpatient pain clinic. I also have several academic positions at various colleges of pharmacy and continue to be a prolific writer for peer reviewed medical and pharmacy journals and also have a popular blog on my website, painedr.com along with other professional affiliations.

I am writing today because of late I have had perhaps hundreds of inquiries from patients, medical providers, and pharmacists regarding clarification for prescribing or dispensing Belbuca (buprenorphine film) and Butrans (buprenorphine transdermal) for the treatment of chronic pain. These inquiries center around access and DEA regulation.

It is clear to me that neither Belbuca nor Butrans necessitate prescribers to obtain the unique DEA identification number above and beyond that which is required for any other controlled substance which is otherwise required for the buprenorphine products currently indicated for opioid abuse disorder.

More specifically, for a DEA licensed clinician it is my understanding that unlike Suboxone, Bunavail, Zubsolv, and Subutex, **Belbuca, Butrans, and even injectable Buprenex do not require that a prescribing clinician hold a subspecialty board certification in addiction psychiatry from the American Board of medical Specialties OR a subspecialty board certification in Addiction Medicine from the American Osteopathic Association OR an addiction certification from the American Society of Addiction Medicine, and have the capacity to provide or to refer patients for necessary ancillary services, OR agree to treat no more than the new limit of 275 patients at any one time in their individual or group practice.**

My request to you is simple. Please provide a letter to me at the address indicated in the above letterhead that confirms the following:

- 1. That any buprenorphine products specifically FDA approved for the treatment of chronic pain do not have any special requirements for prescribers above and beyond the standard DEA license.**
- 2. Such products that do not have added DEA requirements include branded Belbuca Film, Butrans Transdermal Patch, and Buprenex injection.**

Thank you very much for your time. I believe such a letter will help support my recommendations for certain patients to receive appropriate buprenorphine products and encourage clinicians to consider these safer opioid alternatives when clinically indicated.

Sincerely,

Dr. Jeffrey Fudin

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