

May 11, 2020

The Honorable Uttam Dhillon
Acting Administrator
Drug Enforcement Administration
8701 Morrisette Drive
Springfield, Virginia 22152

Submitted electronically at: www.regulations.gov

Re: Adjustments to Aggregate Production Quotas for Certain Schedule II Controlled Substances and Assessment of Annual Needs for the List I Chemicals Ephedrine and Pseudoephedrine for 2020, in Response to the Coronavirus Disease 2019 Public Health Emergency (Docket No. DEA-508A)

Dear Acting Administrator Dhillon:

Vizient, Inc. appreciates the opportunity to comment on the Drug Enforcement Administration (DEA) notice, "Adjustments to Aggregate Production Quotas for Certain Schedule II Controlled Substances and Assessment of Annual Needs for the List I Chemicals Ephedrine and Pseudoephedrine for 2020, in Response to the Coronavirus Disease 2019 Public Health Emergency" (Document identifier: DEA-508A).

Background

Vizient, Inc. provides solutions and services that improve the delivery of high-value care by aligning cost, quality and market performance for more than 50% of the nation's acute care providers, which includes 95% of the nation's academic medical centers, and more than 20% of ambulatory providers. Vizient provides expertise, analytics, and advisory services, as well as a contract portfolio that represents more than \$100 billion in annual purchasing volume, to improve patient outcomes and lower costs. Headquartered in Irving, Texas, Vizient has offices throughout the United States.

Vizient applauds the DEA for adjusting the 2020 aggregate production quotas (APQs) for certain schedule II controlled substances in response to the nationwide COVID-19 public health emergency. In addition, Vizient appreciates DEA's decision to consult with HHS and utilize

authority to issue quotas at the individual dosage-form manufacturing level to ensure that the increase in APQ will be utilized primarily for the manufacturing of medications identified by the FDA as involved in the sedation, intubation, and pain relief of patients being treated for COVID-19. To help ensure these medications are available to patients, Vizient suggests DEA and other stakeholders, including FDA and manufacturers, collaborate to identify barriers and opportunities to support production of these essential medications. Again, Vizient appreciates DEA's efforts to incorporate insight from various agencies and stakeholders in its adaption of the 2020 APQ, and as it continues to make other policy decisions in the interest of patient and public health needs.

Conclusion

Vizient appreciates DEA's willingness to accept comments on this important issue, which provides a significant opportunity for stakeholders to inform the agency on how specific proposals will impact our members.

Vizient membership includes a wide variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and non-acute care needs. Additionally, many are specialized, including academic medical centers and pediatric facilities. Individually, our members are integral partners in their local communities, and many are ranked among the nation's top health care providers. In closing, on behalf of Vizient, I would like to thank CMS for providing us the opportunity to comment on this important proposed rule. Please feel free to contact Jenna Stern (202) 354-2673 or jenna.stern@vizientinc.com, if you have any questions or if Vizient may provide any assistance as you consider these issues.

Respectfully submitted,



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