



May 2, 2024

Marsha L. Ikner
Acting Deputy Assistant Administrator
Diversion Control Division
U.S. Drug Enforcement Administration

[Transmitted by email]

Dear Acting Deputy Assistant Administrator Ikner,

On behalf of the American Pharmacists Association (APhA), we would like to thank the DEA for your recent change in policy regarding quota allocations for commercial manufacturing of schedule II controlled substances. We were very concerned that the previous policy did not take into consideration the complexity, processes, and timing for drug manufacturing, which would only perpetuate or create drug shortages of critical drugs. The new policy will hopefully provide greater predictability for manufacturing.


Founded in 1852, APhA is the largest association of pharmacists in the United States representing the entire pharmacy profession. APhA members practice in community pharmacies, hospitals, long-term care facilities, specialty pharmacies, community health centers, physician offices, ambulatory clinics, managed care organizations, hospice settings, and government facilities. Our members strive to improve medication use, advance patient care, and enhance public health.

Every day, our pharmacist members are challenged to provide patients with the medications they need because of drug shortages. Notably, the shortage of drugs that treat attention-deficit hyperactivity disorder (ADHD) is significantly impacting patients across the country. Parents, caregivers, and patients are burdened with traveling from pharmacy to pharmacy to find their ADHD medication in stock. Recently, more often than not, it is not in stock, leaving persons with mental and behavioral health disorders untreated.

While we appreciate the quota allocation policy changes, we urge DEA to closely examine the legitimate need and demand in the marketplace for ADHD drugs and increase these quota allocations in order to efficiently and effectively bring back stability and availability of these medications on pharmacy shelves.

Thanks for your continuing efforts supporting the pharmacy community and patients. Please contact me at ibernstein@aphanet.org if you have any questions or would like to discuss further.

Sincerely,

A handwritten signature in black ink, reading "Ilisa BG Bernstein". The signature is written in a cursive, flowing style.

Ilisa BG Bernstein, PharmD, JD, FAPhA
Senior Vice President, Practice, Policy & Partnerships
American Pharmacists Association

cc:

Anne Milgram, Administrator

Thomas Prevoznik, Deputy Assistant Administrator

Matthew Strait, Deputy Assistant Administrator