RE: Draft: Changing the Language of Addiction

Dear Office of National Drug Control Policy:

The American Association of Nurse Anesthetists (AANA) welcomes the opportunity to comment on the proposed draft titled “Changing the Language of Addiction.”

The AANA supports the Federal Government's adoption of clinically accurate and non-stigmatizing universal language concerning substance use disorder to:

- Recognize substance use disorder as a chronic brain disorder.
- Remove barriers to comprehensive substance use disorder treatment for recovery.
- Reduce commonly used undesirable and negative terms that imply substance use disorder is a moral failing or choice which perpetuates
  - the stigma, shame, discrimination, and isolation of persons with the disorder;
  - reluctance among those with the disorder to seek treatment; and
  - resistance in the healthcare community to treat persons with the disorder.
- Encourage healthcare professionals and payers to reference current science to correctly diagnose and treat substance use disorder as a chronic and potentially recurring brain disorder.

Background of the AANA and CRNAs

The AANA is the professional association for more than 50,000 Certified Registered Nurse Anesthetists (CRNAs) and student registered nurse anesthetists who represent 90 percent of the nurse anesthetists in the United States. CRNAs are advanced practice registered nurses (APRNs) who personally administer approximately 40 million anesthetics to patients each year in the United States. CRNAs provide acute, chronic, and interventional pain management services. By virtue of their education, clinical experience and licensure, CRNAs use the full range of anesthesia and related services to provide patient-centered, multimodal approach to treat acute and chronic pain to reduce or eliminate the need for opioids, which is important in the care of patients with substance use disorder. As the sole anesthesia professionals in the vast majority of rural hospitals across the country, CRNAs ensure access to obstetrical, surgical, trauma stabilization, and pain management services for medically underserved populations.

Anesthesia professionals, like other healthcare providers with access to opioids in their clinical practice, are at increased risk of opioid use disorder due to the availability of these highly addictive medications. To respond to this issue, the AANA established the Peer Assistance Advisors Committee (PAAC) in 1983 to address patient and provider safety concerns related to impaired providers and substance use disorder. The AANA is committed to educational endeavors that increase awareness to decrease the risk of addiction, respond to peer assistance helpline calls, and publication of evidence-based guidelines for prevention, early recognition, intervention, and
recommendations for comprehensive treatment, long-term recovery, and appropriate re-entry into practice for anesthesia professionals.

The AANA looks forward to continued work to address the opioid crisis through activities that raise awareness of risk through education, limit availability of prescribed and illegal opioids, utilize patient-specific acute and chronic pain techniques to minimize use of opioids, and minimize the stigma of substance use disorder to encourage treatment and recovery. Please contact Lynn Reede, Senior Director, AANA Professional Practice at freede@aana.com with any questions.

Sincerely,

[Signature]

Cheryl L. Nimmo, DNP, MSHSA, CRNA
AANA President

cc: Wanda O. Wilson, PhD, CRNA, AANA Executive Director, CEO
    Lynn J. Reede, DNP, MBA, CRNA, AANA Senior Director, Professional Practice