



January 21, 2025

Maria G. Button  
Health Resources and Services Administration  
5600 Fishers Lane  
Rockville, Maryland 20857

RE: Health Resources and Services Administration (HRSA) Uniform Data System (UDS), OMB No. 0915–0193— Revision.

Dear Ms. Button:

Thank you for requesting comments on the Health Resources and Services Administration (HRSA) plan to submit an Information Collection Request to the Office of Management and Budget to update Uniform Data System (UDS) data collection. We appreciate the agency's leadership in strengthening and expanding substance use disorder treatment provided by health centers.

The Pew Charitable Trusts (Pew) is an independent, nonpartisan research and policy organization. Through its Substance Use Prevention and Treatment Initiative (SUPTI), Pew works with states and at the federal level to address the nation's overdose crisis by developing solutions that improve access to timely, comprehensive, evidence-based, and sustainable prevention and treatment for substance use disorders.

We applaud HRSA's addition of measures related to medications for opioid use disorder (MOUD) and offer comments to underscore the necessity and utility of collecting data on treatment of patients with opioid use disorder (OUD) at HRSA health centers.

The most effective treatments for OUD are medications: methadone, buprenorphine, and naltrexone.<sup>1</sup> However, in 2023, just 18 percent of people with an OUD received them.<sup>2</sup> Federally Qualified Health Centers (FQHCs) are vital to closing this gap, as there is a strong overlap between individuals with OUD, nearly 20 percent of whom are uninsured,<sup>3</sup> and the populations that health centers serve.<sup>4</sup> HRSA health centers are making progress. In 2019, the percentage of health centers offering MOUD was 64 percent, up from 48 percent in 2018.<sup>5</sup> By incorporating measures for OUD treatment, HRSA reinforces the important message that providing FDA-approved medications to treat opioid use disorder fits squarely within the core

mission of FQHCs to provide broad access to high quality care, and allows HRSA to track the extent to which FQHCs are providing this care.

Tracking relevant data that provides a comprehensive picture of care for OUD—from diagnosis through recovery—can help close these gaps, improve treatment, and save lives. In October 2022, Pew published a set of core OUD treatment measures developed by an expert panel using a method known as the “cascade of care,” which examines key measurements in the life cycle of a chronic disease from the initial diagnosis to outcome.<sup>6</sup> The measure set includes: OUD diagnosis, standardized screening for substance use disorder, use of MOUD, OUD provider availability, continuity of MOUD, initiation and engagement in OUD treatment, follow-up after an emergency department visit for substance use, and one or more patient-reported outcomes as a measure of recovery.

We are pleased to see that HRSA intends to incorporate measures in line with the cascade of care into the UDS. Specifically, we strongly support the proposed new measures that assess:

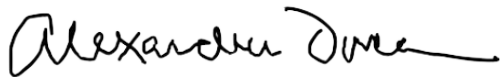
- the number of visits where MOUD was administered
- initiation and engagement of substance use disorder treatment

These core measures, along with the data HRSA already collects on the number of patients receiving MOUD and the number of providers authorized to prescribe buprenorphine, help to build a more complete picture of OUD treatment provided by health centers. Incorporating a quality-of-care measure like administration of MOUD was also identified by Pew and the Center for Health Care Strategies as an opportunity for HRSA to encourage health centers to provide higher quality care for the treatment of OUD.<sup>7</sup>

Applying these metrics can help health centers determine which aspects of their efforts to treat OUD are working well and which may require greater attention and resources. To that end, we encourage HRSA to provide technical assistance and supplemental funding for health centers to develop plans to regularly review performance data and use it to inform quality, program, and policy improvement. A key step in implementing the core OUD measures is stratifying the data by subpopulation, such as race, ethnicity, and rurality, in order to identify treatment disparities and opportunities for improvement.<sup>8</sup> Additional resources may be needed for health centers to perform these analyses and understand how efforts to provide MOUD to patients in health centers can work most effectively.

Thank you again for the opportunity to provide input and for your continued dedication to these issues. Please reach out to Jenna Bluestein ([jbluestein@pewtrusts.org](mailto:jbluestein@pewtrusts.org)) in our Government Relations practice for additional information or questions.

Sincerely,



Alexandra Duncan, Ph.D.  
Project Director, Substance Use Prevention and Treatment Initiative

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<sup>1</sup> National Academies of Sciences, Engineering, and Medicine, “Medications for Opioid Use Disorder Save Lives (2019), <https://nap.nationalacademies.org/catalog/25310/medications-for-opioid-use-disorder-save-lives>.

<sup>2</sup> Substance Abuse and Mental Health Services Administration, “Key Substance Use and Mental Health Indicators in the United States: Results from the 2023 National Survey on Drug Use and Health” (2024), <https://www.samhsa.gov/data/report/2023-nsduh-annual-national-report>.

<sup>3</sup> Orgera, Kendal, and Jennifer Tolbert, “Key Facts about Uninsured Adults with Opioid Use Disorder,” KFF (2019), <https://www.kff.org/uninsured/issue-brief/key-facts-about-uninsured-adults-with-opioid-use-disorder/>.

<sup>4</sup> National Association of Community Health Centers, “America’s Health Centers: By the Numbers” (2024), <https://www.nachc.org/resource/americas-health-centers-by-the-numbers/>.

<sup>5</sup> Corallo, Bradley, Jennifer Tolbert, Jessica Sharac, Anne Markus, and Sara Rosenbaum, “Community Health Centers and Medication-Assisted Treatment for Opioid Use Disorder - Issue Brief – 9516,” KFF (2020), <https://www.kff.org/report-section/community-health-centers-and-medication-assisted-treatment-for-opioid-use-disorder-issue-brief/>.

<sup>6</sup> The Pew Charitable Trusts, “States Should Measure Opioid Use Disorder Treatment to Improve Outcomes” (2022), <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2022/10/states-should-measure-opioid-use-disorder-treatment-to-improve-outcomes>.

<sup>7</sup> Meryl Schulman and Ashley Jasko, “Opportunities to Promote Medications for Opioid Use Disorder in Federally Qualified Health Centers,” Center for Health Care Strategies (2024), <https://www.chcs.org/media/Opportunities-to-Promote-Medications-for-Opioid-Use-Disorder-in-Federally-Qualified-Health-Centers.pdf>.

<sup>8</sup> Tami L. Mark, Frances McGaffey, Jane Koppelman, and Victoria Yastishock, “State Measures for Improving Opioid Use Disorder Treatment: Implementation Toolkit,” RTI International (2022), [https://www.pewtrusts.org/-/media/assets/2022/11/14798\\_pew\\_metrics\\_toolkit\\_111722.pdf](https://www.pewtrusts.org/-/media/assets/2022/11/14798_pew_metrics_toolkit_111722.pdf).