



Docket ID: CDC-2015-0112
Thomas R. Frieden, M.D., M.P.H.
Director
Centers for Disease Control and Prevention 1600 Clifton Rd, MS D-14
Atlanta, GA 30333

January 13, 2016

Dear Dr. Frieden:

The National Physicians Alliance (NPA) is pleased to submit comments to the docket on the Proposed 2016 Guideline for Prescribing Opioids for Chronic Pain. NPA represents physicians from across medical specialties. The organization works to increase the engagement of physicians in their communities to improve health.

NPA strongly supports CDC's effort to issue guidance to clinicians on opioid use for chronic pain. Despite low-quality evidence supporting practice change, use of long-term and high dose opioids for chronic pain increased dramatically over the past two decades. Concurrently, opioid analgesic overdose deaths and opioid addiction have increased markedly. We believe that the CDC's proposed guideline will improve care for chronic pain patients and reduce harm caused by opioid overprescribing.

We offer the following specific comments to the docket:

1. We strongly support the recommendation that prescribers should avoid increasing the total daily opioid dose above 90mg morphine equivalents, and that "Three or fewer days usually will be sufficient for most non-traumatic pain not related to major surgery."
2. We urge CDC to strengthen the first recommendation, which states that opioids are not preferred for chronic pain. We believe that prescribers should be explicitly asked to avoid opioid use for fibromyalgia, low back pain and chronic headache because for these conditions opioid risks outweigh potential benefits.
3. We urge the CDC to use language that favors non-opioid pain reduction strategies proven to effectively maintain or improve function over the long-term.
4. We agree with CDC that opioids should only be continued in patients who demonstrate clinically meaningful improvement in function and we strongly support the recommendation that providers should establish treatment goals with all patients, including realistic goals for pain and function before initiating long-term opioids. Expert panel reviews did not locate quality studies demonstrating improvement in function with the use of chronic opioids.

NPA urges CDC to resist pressure from industry-funded organizations that want the dosing and duration of use recommendations removed from the guideline. The ability of the guideline to foster more cautious prescribing practices will be greatly diminished if CDC removes these items. We appreciate your leadership on this issue. We look forward to continuing to work together to reduce opioid prescribing, save lives, and reverse this terrible epidemic.

Sincerely,



William B. Jordan, MD MPH
NPA President



Lisa Plymate, MD
Co-Chair, NPA FDA Taskforce