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April 1<sup>st</sup>, 2019

Alex Azar, JD  
Secretary, US Department of Health and Human Services  
330 C Street SW  
Washington, DC 20416

Re: Pain Management Best Practices Inter-Agency Task Force Draft Report on Pain Management Best Practices: Updates, Gaps, Inconsistencies, and Recommendations (HHS-OS-2018-0027)

Comments submitted electronically at [www.regulations.gov](http://www.regulations.gov)

Dear Secretary Azar,

Thank you for the opportunity to submit comments on the draft report (file code HHS-OS-2018-0027), *Pain Management Best Practices Inter-Agency Task Force Draft Report on Pain Management Best Practices: Updates, Gaps, Inconsistencies, and Recommendations*. The Global Healthy Living Foundation (GHLF) is a 20-year-old 501(c)(3) patient organization reaching millions of chronically ill patients and their caregivers across the country through social media, community events and our online support and education. GHLF works to improve the quality of life for patients living with chronic disease by making sure their voices are heard and advocating for improved access to care at the community level. Our patients suffer from chronic conditions including arthritis, psoriasis, gastrointestinal disease, cardiovascular disease and migraine. As a result, these patients incur significant financial burden due to the high cost of the treatments that are necessary to manage their disease. And, it is on behalf of the patients we represent that we provide this information for your consideration. We have also submitted comments as a member of the Consumer Pain Advocacy Task Force (CPATF).

We appreciate that the Secretary quickly implemented the Pain Management Best Practices Inter-Agency Task Force (“Task Force”) authorized by the Comprehensive Addiction and Recovery Act of 2016 , and appreciate the effort to complete such a comprehensive report. . Chronic pain is a real public health problem that is nothing short of debilitating for those going through it. Many individuals suffering in pain simply cannot function, cannot go to work, have difficulty raising their children, and simply interacting with society. More research is needed to develop non-opioid alternative therapies for these patients so their pain is adequately addressed.

The opioid crisis is equally real. We are at a point where nearly every Americans knows someone who has suffered as a result of addiction. In representing patients who suffer daily in physical pain, GHLF promotes alternative pain management techniques vigorously: where viable, we encourage our patients to talk with their healthcare provider about trying options such as physical therapy, meditation, acupuncture, yoga/stretching and non-opioid prescription and over-the-counter pain relief medications. We believe that opioids should never be used as a first

line of treatment for chronic pain and should be used only under the strictest guidance from physicians to reduce the likelihood of abuse.

However, there remain chronically ill patients who cannot handle daily tasks without suppressing their pain in the way that opioids do or for other reasons cannot tolerate alternatives.

As you consider policy changes and work to finalize the report, we urge you to acknowledge the challenges these patients face. First and foremost: take care not to stigmatize patients who rely on pain management to get through their daily routines. The damage being done by opioids needs to end, but these discussions often ignore the very real physical pain that over 50 million Americans face every day.<sup>1</sup>

Second, when addressing pain management, Americans need to have better access to alternative treatments as outlined above. These treatments need to be cost effective for patients and covered by insurance in order for them to be used.

Thank you very much for the opportunity to comment on this draft report and again, for all of the agency's efforts to reduce drug prices and help patients safely and effectively address their pain. We look forward to being a resource to the agency and partnering with policymakers to implement policies that result in patients having greater access to treatment while lowering costs to the healthcare system. Please do not hesitate to contact me at [snewmark@ghlf.org](mailto:snewmark@ghlf.org) if we may be of further assistance with the Task Force's work or if you have questions on our comments.

Sincerely,

A handwritten signature in black ink that reads "Steven Newmark". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven Newmark  
Director of Policy and General Counsel  
Global Healthy Living Foundation

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<sup>1</sup> Prevalence of Chronic Pain and High-Impact Chronic Pain Among Adults — United States, 2016, September 14, 2018 / 67(36);1001–1006, <https://www.cdc.gov/mmwr/volumes/67/wr/mm6736a2.htm>.