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June 15, 2020

Robert Redfield, MD, Director
Centers for Disease Control and Prevention
1600 Clifton Road NE
Atlanta, Georgia 30329

Re: Management of Acute and Chronic Pain: Request for Comment, Docket No. CDC-2020-0029

Comments submitted electronically at www.regulations.gov

Dear Director Redfield,

Thank you for the opportunity to submit comments on Management of Acute and Chronic Pain: Request for Comment, Docket No. CDC-2020-0029. The Global Healthy Living Foundation (GHLF) is a 21-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, migraine, and other diseases. These patients incur significant pain – both physical and emotional – because of their conditions. It is on behalf of the patients we represent that we provide this information for your consideration regarding pain management. We thank the Centers for Disease Control and Prevention (CDC) for soliciting comments as it considers future policies towards pain management.

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 to best address their pain.

The opioid crisis is equally real. We are at a point where nearly every American 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. 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, 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.¹

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 for them to be used. As outlined above, there are non-opioid treatments for pain, but too often these alternative treatments are not cost-effective for patients.

Thank you again for the opportunity to comment and again, for the CDC'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 contact me at snewmark@ghlf.org with questions.

Sincerely,

A handwritten signature in black ink that reads "Steven Newmark". The signature is written in a cursive, flowing style.

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

¹ 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>.