

May 3, 2021

The Honorable Rachel Levine, MD  
Assistant Secretary for Health  
U.S. Department of Health and Human Services (HHS)  
200 Independence Ave. SW, Room 715-G  
Washington, DC 20201

RE: Promoting HHS Pain Management Task Force Recommendations

Dear Assistant Secretary Levine:

We are writing to you as members of the Protecting Access to Pain Relief (PAPR) Coalition to urge that HHS explore and support new efforts to promote the work and recommendations of the HHS Pain Management Best Practices Inter-Agency Task Force (“Task Force”), which provides important recommendations on a number of areas related to pain and pain treatment to ensure that patients nationwide have access to evidence-based information on a range of safe and effective tools and methods for treating their acute and chronic pain.

The PAPR Coalition, founded in 2015, is a non-partisan coalition of public health and patient-centered organizations whose mission is to advocate for public policy that supports continued access to and choice of appropriate over-the-counter (OTC) pain relief and evidence-based education on safe use of OTC pain relief options as part of a patient’s comprehensive pain management plan ([www.paprcoalition.com](http://www.paprcoalition.com)). Collectively, our Coalition reaches millions of people living with pain, patients managing chronic disease, healthcare professionals, workers, and concerned citizens. Our combined communications and engagement platforms have proven to be a powerful resource with the demonstrated capacity to educate and mobilize Americans on complex and timely public health issues.

The Task Force, authorized by the *Comprehensive Addiction and Recovery Act (CARA) of 2015*,<sup>1</sup> was charged with identifying gaps or inconsistencies in pain management best practices among federal agencies and making recommendations to address those gaps. Given its important charge, the PAPR Coalition submitted [public comments](#) in response to the Task Force’s draft report entitled “Draft Report on Pain Management Best Practices: Updates, Gaps, Inconsistencies, and Recommendations.” Ultimately, the Task Force put forward its final report in May 2019 with a series of comprehensive, common-sense recommendations developed through the review and analysis of over 9,000 public comments and testimonials. Its recommendations included:

- Encouraging a multidisciplinary approach to pain care, with improved access to and coverage of multidisciplinary treatment options including evidence-based complementary and integrative care;
- Treating pain on an individualized basis, without one-size-fits-all rules or policies; and,

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<sup>1</sup> Public Law 114-198.

- Developing and disseminating public, patient, provider and policymaker education about pain in order to eliminate stigma and deliver effective, patient-centered care.

Unfortunately, many of these recommendations have not been widely disseminated or acted upon. We see this as a missed opportunity for HHS to utilize this important and widely touted resource to assist its efforts to provide the most comprehensive treatment possible.

Pain is incredibly widespread in the United States, with chronic pain and high-impact chronic pain affecting 50 million and 19.6 million adults respectively nationwide at an estimated annual cost of over \$500 billion. We wish to serve as a resource for you as you consider ways to use these important recommendations to update federal pain management policies and tools to provide the most up-to-date and evidence-based information to patients through comprehensive education tools. In addition, we wish to discuss ways we can work collaboratively with you to ensure adequate treatment of pain nationwide, including ways that education about the safe use of pharmacologic and nonpharmacologic OTC pain relief options may be best utilized to continue your important work to curb the opioid epidemic that you began during your time as Secretary of Health for the Commonwealth of Pennsylvania.

We look forward to working with you and other HHS leaders to ensure that all Americans are able to treat their pain safely and effectively with all appropriate options at their disposal, and would appreciate the opportunity to discuss these issues with you at your earliest convenience.

If you have any questions about this correspondence, please contact Michael Werner ([michael.werner@hklaw.com](mailto:michael.werner@hklaw.com)), Joel Roberson ([joel.roberson@hklaw.com](mailto:joel.roberson@hklaw.com)), or Ethan Jorgensen-Earp ([ethan.jorgensen-earp@hklaw.com](mailto:ethan.jorgensen-earp@hklaw.com)).

Sincerely,

Alliance for Aging Research  
American Academy of Pediatric Dentistry  
American Association of Kidney Patients  
American Association of Oral and Maxillofacial Surgeons  
American Chronic Pain Association  
American Pharmacists Association  
American Society of Nephrology  
American Society for Pain Management Nursing  
BeMedWise Program at NeedyMeds  
The Gerontological Society of America  
Renal Physicians Association  
TransplantFirst Academy  
U.S. Pain Foundation  
Veterans Transplantation Association