

180 signatures were submitted on March 5, 2018 to the docket at Regulations.gov. By March 13, roughly ~220 had signed, including eight who had official roles in the development of the 2016 CDC Guideline.

### **Introduction to the Letter**

We wish to register our shared concern regarding opioid-related provisions in the "2019 Notice of Methodological Changes for Calendar Year 2019 for Medicare Advantage Capitation Rates, Part C and D Payment Policies and 2019 Draft Call Letter, CMS 2017-0163." The letter, titled "Unhelpful and Risky" was prepared on March 4, 2018. The first 180 signatures were collected in just 28 hours, underscoring the depth of our concern that patients will be put at risk if the proposed opioid-related provisions are enacted.

Three of us (Dr. Stefan G. Kertesz, Dr. Adam Gordon and Dr. Ajay Manhapra) prepared the letter. We are academic general internal medicine physicians with board certification in addiction medicine and a history of publication focused on addiction, primary care and current roles in enhancing opioid safety through our clinical work, research, and teaching. We have no grants, funding, honoraria or income related to the pharmaceutical industry now or in the past. Dr. Kertesz previously held privately-owned stock in Abbot and Merck (amounting to <3% of assets), sold in December of 2017.

The signature list for this letter was open to individuals with clinical degrees in fields such as medicine, pharmacy and nursing. All signatures represent individuals speaking on their own behalf. None speak on behalf of their employers, or any other organization with which they are affiliated.

The list of signatories reflects deep and wide expertise directly relevant to the the CMS Proposal.

As of March 13, the signatories include eight persons who played official roles in the development and finalization of the 2016 CDC Guideline on Prescribing Opioids for Chronic Pain (Starrels, Cunningham, Bair, Coffin, Ballantyne, Tape, Krebs, Merrill). It includes two members of the Board of Directors for the American Board of Addiction Medicine (Friedmann, Samet), three past Presidents of the Association for Medical Education and Research on Substance Abuse (Alford, Samet, Saitz), and two past Presidents of the Society of General Internal Medicine (Kroenke, Turner).

A high percentage of respondents are active medical faculty at leading medical schools (several from Harvard, Yale, University of California San Francisco, Einstein, Boston University and Stanford). Moreover, our respondents encompass professional expertise in addiction, primary care, pain, pharmacy, nursing and palliative care. The respondents also include experts in opioid safety (Merrill, Alford, Manhapra, Webster, Gordon, Kertesz, Fox, among others), and psychological interventions for pain (Darnall).

We understand that CMS, like all public and private agencies, seeks to foster a health system response appropriate to the magnitude of the crisis facing our nation. We hope you will read the attached letter with the understanding that we wish to be constructive while cautioning against actions that could do severe harm.

On behalf of the signatories, Stefan G. Kertesz, MD, MSc

**Unhelpful and Risky (submission to Regulations.gove on March 5, 2018; updated signature list will be provided to CMS on March 23, 2018):**

**Health Professionals' Response to the 2019 Notice of Methodological Changes for Calendar Year 2019 for Medicare Advantage Capitation Rates, Part C and D Payment Policies and 2019 Draft Call Letter, CMS 2017-0163**

We write as medical, addiction, pain and rehabilitation professionals to oppose the [CMS 2019 proposed policy for 2019](#) that would impose denial of payment at point of sale for two types of prescription (1):

- Prescriptions for any beneficiary where cumulative opioid dose total exceeds calculated total of 90 morphine milligram equivalents (MME), subject to appeal
- Prescriptions of 7 days or greater for “opioid naïve” patients without exception or variation for any human circumstance including cancer, hospice, suspected deadly disease, or major geographic barriers

This policy will affect up to 1.6 million Medicare beneficiaries who received >120 MME for at least one day (per the Proposal), and far more than the 500,000 chronically dosed at >120 MME for at least 3 months, according to the HHS [Office of the Inspector General](#) (2).

Upfront, we assert that excess opioid prescribing over the last 15 years was adverse and required correction. Signatories to this letter include professionals who assisted the [2016 CDC Guideline](#) (3), editors of scholarly journals, individuals who have set up systems of care to remediate adverse prescribing, as well as experts in pain, addiction & primary care.

Our objections to the payer-imposed 90 MME proposal are four-fold:

**1) It will accelerate non-patient-centered, nonconsensual opioid dose reductions.**

While a [strong case can be made for consensual, supported opioid dose reductions for voluntary patients](#), no data support nonconsensual/forcible dose reductions or curtailment in otherwise stable patients that have become common as prescribers react to regulations, mandates, insurers and fear for professional security (4). There is anecdotal [evidence](#) of harm (emotional trauma, [medical](#) or psychiatric [deterioration](#), [suicide](#), (5-8)) that we believe the CMS proposal will accelerate, despite an appeal mechanism whose flaws will be noted below.

**2) The policy does not agree with the 2016 CDC [Guideline](#) on Prescribing Opioids (3).**

The dose thresholds featured in the Guideline's statement pertain specifically to dose escalation from a dose below to a dose beyond the threshold (Recommendation 5). The Guideline does not recommend that these thresholds be used as targets for non-consensual dose reduction for patients who are already prescribed a higher dose of opioids (Recommendation 7). A calibrated evaluation of harm and benefit should guide care. The CMS proposal numbers among many initiatives that impede the 7<sup>th</sup> Recommendation.

**3) The proposal does not consider adverse impacts on pharmacies, physicians or patients in the context of multiple regulatory [initiatives](#), and it will accelerate patient abandonment (9).**

The appeal mechanism proposed by CMS calls for payers to accept a simple attestation that a higher dose is “medically necessary”. The bureaucratic work to affirm these attestations entails 3 and 4-way communication between pharmacy, Prior Authorization management contractors (e.g. Magellan), doctors’ offices and insurers. The labor is substantial and uncompensated. Worse, the CMS proposal does not in any way provide the targeted case management for truly high-risk patients that was recommended by the [OIG](#). The CMS plan risks accelerating a chaotic pattern of churn, abandonment and medical harm to patients who receive opioids as physicians flee an increasingly risk-laden and cumbersome decision matrix that may not advance patient safety.

**4) The proposal does not include metrics to evaluate how it affects patient health or access to care.**

The plan avows no metric for success other than reducing certain measures of prescribing. Neither patient access to care nor patient health outcomes are mentioned. Where patients receiving opioids are redirected to pain specialists for opioid management, access to such specialists is limited and there are anecdotal reports of invasive procedures being required as precondition for continued opioid receipt. These procedures involve risk and cost. Thus far, a [48% reduction](#) in high dose prescribing since 2010 (10) has not been accompanied by a reduction in the number of deaths ascribed to natural or semisynthetic opioids (absent heroin or fentanyl) since 2011 (9300-9800 yearly according the National Vital Statistics System (NVSS)). A focus on prescription reduction, absent patient outcome assessment, is inadequate.

Regarding the 7-day limit, signatories agree that on whole, shorter prescriptions are prudent in most situations. They are likely to reduce risk of diversion. However, regulations on this matter have proceeded in [many states](#) already (9). The CMS plan allows no exceptions even for patients with suspected metastatic cancer, or hospice, and merits reconsideration.

References follow below signatures. Signatures are indicated with **C** to indicate a formal role in developing/reviewing **the CDC Guideline**, **A** for addiction expertise, **P for pain**, **PC for primary care**. Views here are those of the authors alone, and **do not represent positions of their employing organizations**, federal or otherwise. Signature reflects consent for public posting of our names as well.

Signatories

Stefan G. Kertesz, MD, MSc, University of Alabama at Birmingham School of Medicine & Birmingham VA Medical Center Opioid Safety Initiative (A)(PC)

Adam J. Gordon, MD, MPH, University of Utah School of Medicine VA Utah Health Care System, Editor-in-Chief, Substance Abuse (A)(PC)

Ajay Manhapra, MD, Advanced PACT Pain Clinic, Hampton VA Medical Center and Yale University (A)(PC)(P)

Joanna L. Starrels, MD, MS, Associate Professor of Medicine, Albert Einstein College of Medicine and Montefiore Medical Center, Bronx NY (C)(A)(P)(PC)

Erin E. Krebs, MD, MPH Associate Professor of Medicine, University of Minnesota and Women's Health Medical Director, Minneapolis VA Health Care System (P)(PC)(C)

Chinazo Cunningham, MD, MS, Associate Chief, Division of General Internal Medicine and Professor of Medicine, Albert Einstein College of Medicine and Montefiore Medical Center, Bronx, NY

Jane C Ballantyne MD FRCA; Professor, University of Washington, Seattle, WA (P)(C)

Matthew J. Bair, MD, MS Associate Professor of Medicine, Indiana University School of Medicine (P) (PC) (C)

Thomas G. Tape, MD, MACP, Professor and Chief, General Internal Medicine, University of Nebraska Medical Center, Omaha, NE (C)(PC)

Phillip O. Coffin, MD, MIA, FACP, Department of Medicine, University of California San Francisco (C, A, PC)

Joseph O. Merrill, MD, MPH. Associate Professor of Medicine, University of Washington, Seattle, Washington. (C)(A)(PC)

Jeffrey Samet, MD, MA, MPH, John Noble MD, Professor in General Internal Medicine, and Chief, General Internal Medicine, Boston University School of Medicine, Boston Medical Center (A) (PC)

Daniel P. Alford, MD, MPH, Professor of Medicine, Director, Clinical Addiction Research and Education Unit, Boston University School of Medicine and Boston Medical Center (A) (PC)

Richard Saitz MD MPH FACP DFASAM, Professor of Community Health Sciences, Chairman, Department of Community Health Sciences, Boston University Schools of Public Health and Medicine, Boston Medical Center and Senior Editor, Journal of Addiction Medicine (A, PC)

Carlos Estrada, MD, MS, University of Alabama at Birmingham School of Medicine & Birmingham VA Medical Center (PC)

Terri Lewis, Ph.D., NCC, Rehabilitation Institute, Southern Illinois University-Carbondale, Illinois

Ryan Marino, MD. Division of Medical Toxicology. Department of Emergency Medicine. University of Pittsburgh.

Michael E. Schatman, Ph.D., Department of Public Health & Community Medicine, Tufts University School of Medicine, Boston, MA; Editor-in-Chief, Journal of Pain Research (P)

Cathleen London, MD former Assistant Professor Weill Cornell Medical College, Clinical Instructor Tufts University School of Medicine, Boston University School of Medicine

Richard T Barnett, Psy.D., M.S., Federal Advocacy Coordinator, VT Psychological Association. President/CEO - Center for Addiction Recognition Treatment Education Recovery (CARTER, Inc)

Peter Grinspoon, M.D. Massachusetts General Hospital, Harvard Medical School, Massachusetts. (PC)

Jessica Whelan, PMHNP-BC, MSN, RN, Psychiatric Mental Health Nurse Practitioner, Compassionate Health Care, St. Louis, MO

Lynn Webster MD, Vice President Scientific Affairs, PRA Health Sciences, Salt Lake City, Utah

Aaron D. Fox, MD MS, Associate Professor of Medicine, Albert Einstein College of Medicine-Montefiore Medical Center, Bronx, NY (A)(PC)

Beth Darnall, PhD, Clinical Professor; Department of Anesthesiology, Perioperative and Pain Medicine; Stanford University School of Medicine (P)

Laurie Gordon, MD, DFAPA, Weill Cornell Medical School

Sally S. Satel, MD, American Enterprise Institute, Partners in Drug Abuse Rehabilitation and Counseling (Staff Psychiatrist), Yale University (A)

Adam Lake, MD, AAHIVS, FAAFP, CMQ, Associate Director, Penn Medicine/Lancaster General Family and Community Medicine Residency , Family Physician LGHP-Comprehensive Care (A)(PC)

Jennifer Sharpe Potter, PhD, MPH, Associate Professor of Psychiatry, Long School of Medicine, University of Texas Health Science Center San Antonio, Texas (P)(A)

Joseph W. Frank, MD, MPH, University of Colorado School of Medicine & VA Eastern Colorado Health Care System (P)(PC)

Patrick C. Doyle, MSW Boston College; Licensed Independent Clinical Social Worker, Commonwealth of Massachusetts; Family Opioid Coach (A)

Carol S. North, MD, MPE, The Nancy and Ray L. Hunt Chair in Crisis Psychiatry and Professor of Psychiatry, Director, Division of Trauma & Disaster, The University of Texas Southwestern Medical Center

George Dawson, MD, DFAPA. Staff Psychiatrist - Hazelden Betty Ford Foundation, Adjunct Professor - Hazelden Graduate School of Addiction Studies; Center City, MN (A)

Robert Twillman, PhD, FAPM, Executive Director, Academy of Integrative Pain Management (P)

Lucas G. Hill, PharmD, BCPS, BCACP; Clinical Assistant Professor, The University of Texas at Austin College of Pharmacy (A)(PC)

Anika A. H. Alvanzo, MD, MS, Director, Substance Use Disorders Consultation Service, Johns Hopkins University School of Medicine

Kathleen Guevara, MSW, LICSW, LADC 1, Associate Professor Harvard Medical School Specialty in Addictive Disorders (2008-12), (A).

Ruth Ann Crystal, MD, Adjunct Clinical Faculty, Stanford University School of Medicine

Sidney H Schnoll, MD, PhD, Vice President Pharmaceutical Risk Management, Pinney Associates, Inc. Bethesda, MD (A) (P)

Erica Essary, PsyD CAADC, President, Spectrum Psychological Services, Darien, IL (A)

Soraya Azari, MD; Associate Professor of Medicine, University of California, San Francisco (A) (P) (PC)

Robert V. Brody, MD, Attending physician, Medicine and Pain Services and General Medicine and Pain Clinics, San Francisco General Hospital; Clinical Professor of Medicine and Family & Community Medicine, University of California, San Francisco (P) (PC)

Zackary Berger, MD, PhD, Associate Professor of Medicine, Johns Hopkins Division of General Internal Medicine, Core Faculty, Johns Hopkins Berman Institute of Bioethics (PC)

Honora Englander, MD, FACP, Associate Professor of Medicine, Oregon Health & Science University (A)

Kurt Kroenke, MD, MACP, Chancellor's Professor of Medicine, Indiana University School of Medicine, and Research Scientist, Regenstrief Institute and VA Center for Health Information and Communication (P) (PC)

Monika M. Safford, MD, John J. Kuiper Professor of Medicine and Chief, Division of General Internal Medicine, Weill Cornell Medicine, New York (PC)

Darius A. Rastegar, MD, Associate Professor of Medicine, Johns Hopkins University School of Medicine. (A) (PC)

Daniel G. Tobin, MD, FACP. Associate Professor of Medicine, Medical Director YNHH SRC Adult Primary Care Center, Yale University School of Medicine (A) (PC)

Richard C. Dart, MD, PhD, FACEP, FAACT. Professor of Emergency Medicine, University of Colorado and Director, Rocky Mountain Poison and Drug Center, Denver, Colorado

John P. Moriarty, MD, FACP. Associate Professor of Medicine, Program Director Yale Primary Care Residency, Yale School of Medicine (PC)

Auguste H. Fortin VI, MD, MPH, MACP, FACH, Professor of Medicine, Yale School of Medicine (PC)

Michael Fingerhood MD FACP, Associate Professor of Medicine and Public Health, Johns Hopkins University (A) (PC)

Jeffrey Fudin, PharmD, DAIPM, FCCP, FASHP, FFSMB. Chief Executive Officer & Chief Medical Officer, Remitigate, LLC; Adjunct Associate Professor, Western New England University College of Pharmacy and Albany College of Pharmacy & Health Sciences

Michael S. Saag, MD, Professor of Medicine, Associate Dean for Global Health, Director of the UAB Center for AIDS Research, University of Alabama at Birmingham (**PC**)

Rachel J Stern MD, Assistant Professor of Medicine. University of California, San Francisco.

James DeMicco, PharmD, Adjunct Professor, Long Island University College of Pharmacy, Brooklyn, NY (AP)

Adam Lake, MD, AAHIVS, FAAFP, CMQ  
Associate Director, Penn Medicine/Lancaster General Family and Community Medicine Residency, Family Physician LGHP-Comprehensive Care (A)(PC)

Michael Paasche-Orlow MD, MA, MPH  
Professor of Medicine, Boston University School of Medicine and Boston Medical Center  
(A)(PC)

Timothy Sowicz, Ph.D., CRNP, Advanced Fellow in Addiction Treatment &  
Nurse Practitioner, VA Pittsburgh Healthcare System, Interdisciplinary Addiction Program for  
Education and Research, University of Pittsburgh Medical Center and VA Pittsburgh Health Care  
Center (A)(P)(PC)

Barbara Turner M.D., M.S.Ed., M.A., MACP, Professor of Medicine, Director, ReACH Center  
Univ of Texas Health Science Center San Antonio San Antonio TX (A)(PC)(P)

Lachlan Forrow, MD, Palliative Care Physician and Director, Ethics Programs, Beth Israel  
Deaconess Medical Center; Associate Professor of Medicine, Harvard Medical School (P)

Jane Liebschutz, MD MPH FACP, Chief, Division of General Internal Medicine, Visiting  
Professor of Medicine, University of Pittsburgh School of Medicine, UPMC Health systems,  
Pittsburgh, PA (A, PC)

Jordan Tishler, MD, CEO/CMO InhaleMD, Harvard Medical School, Boston MA (A, P)

Michele L. Matthews, PharmD, CPE, BCACP, Associate Professor of Pharmacy  
Practice/Advanced Practice Pharmacist, MCPHS University/Brigham and Women's Hospital;  
Boston, MA (A)(P)(PC)

Marc Larochelle, MD, MPH, Assistant Professor of Medicine, Boston University School of  
Medicine and Boston Medical Center, Boston, MA (A, PC)

Scott E. Hadland, MD, MPH, MS, Assistant Professor of Pediatric, Boston University School of  
Medicine and Boston Medical Center, Boston, MA

Mishka Terplan MD MPH FACOG DFASAM, Professor Obstetrics & Gynecology and Psychiatry,  
Virginia Commonwealth University, Richmond, VA (A)

Sarah Wakeman, MD, FASAM, ABAM, ADM, Assistant Professor of Medicine, Harvard Medical  
School and Massachusetts General Hospital (A)(PC)

Omar Manejwala, MD, DFAPA, FASAM Chief Medical Officer, Catasys. (A)

David E. Pollio, PhD MSW, Distinguished Professor, University of Alabama at Birmingham. (A)

Tim Lahey, MD MMSc, Associate Professor, Dartmouth's Geisel School of Medicine

Thomas Brooks, M.D. DABA, DABPM, Associate Professor, Director of Interventional Pain Medicine, University of Nebraska Medical Center (P)

Stephen R. Holt, MD, MS, FACP. Assistant Professor of Medicine, Director YNHH SRC Addiction Recovery Clinic, Yale University School of Medicine (A) (PC)

Thomas Sachy MD, MSc, Georgia Pain and Behavioral Medicine, (P) (A).

Stephen J. Ziegler, PhD, JD, Professor Emeritus, Purdue University, Fort Wayne (P)

Shadi Nahvi, MD, MS, Associate Professor of Medicine, Albert Einstein College of Medicine-Montefiore Medical Center, Bronx, NY (A)(PC)

Jeremy Schwartz, MD, FACP, FAAP. Assistant Professor of Medicine, Yale School of Medicine

Scott Steiger, MD, FACP, FASAM, Associate Professor of Medicine and Psychiatry, University of California San Francisco, Deputy Medical Director Opiate Treatment Outpatient Program at Zuckerberg San Francisco General Hospital (A)(PC)

Jessica Beaman, MD, MPH, Assistant Professor of Medicine, University of California, San Francisco (PC)

Richard L. Martin, BSPHarm, Idaho State University (P)

Alethia Sellers, MD, CMQ, Associate Professor of Anesthesiology and Pain Medicine, University of Alabama at Birmingham School of Medicine (P)

Timothy J Ness MD PdD, Professor of Anesthesiology and Pain Medicine, University of Alabama at Birmingham School of Medicine (P)

Margaret Aranda, MD, PhD, Fellow, Age Management Medicine; Cenegenics Beverly Hills, CA

Peter D. Friedmann, MD, MPH, DFASAM, FACP, Associate Dean for Research and Professor of Medicine, University of Massachusetts Medical School (UMMS)-Baystate, Professor of Quantitative Health Sciences, UMMS, and Deputy Editor, Journal of Substance Abuse Treatment. (A, PC)

Richard L. Kravitz, MD, MSPH, Professor of Internal Medicine, University of California, Davis; Director, UC Center Sacramento; Immediate Past Co-Editor in Chief, Journal of General Internal Medicine

Daniel Pomerantz MD MPH FACP, Assistant Professor of Medicine, Assistant Professor of Family Medicine (Palliative Care), Albert Einstein College of Medicine, Director of Ambulatory Care, and Director of Palliative Care, Montefiore New Rochelle Hospital (PC)

Brent W. Thiel, MD, Clinical Instructor of Medicine, University of Pittsburgh School of Medicine and UPMC, Pittsburgh, PA (PC)

Ken Freedman, MD, MS, MBA, FACP, DFSAM, Clinical Professor of Medicine Tufts University School of Medicine, Chief Medical Officer, Lemuel Shattuck Hospital (A) (P)

Daliah Heller, PhD MPH, Investigator CUNY Institute for Implementation Science, Adjunct Professor, CUNY Graduate School of Public Health and Health Policy

Esther Choo, MD MPH, Associate Professor, Oregon Health & Science University (A)

Steven R Ariens, BSPharm, R.Ph. Chronic Pain Consultant/Advocate

James G. Marx, MD, FASAM, ABAM, DABPM, Manager Nevada Docs Care, LLC (A, P)

Elise A. Dasinger, PharmD, VA Quality Scholars Fellow, Birmingham VA Medical Center

Serena Roth, MD, Assistant Professor of Medicine, Albert Einstein College of Medicine and Montefiore Medical Center, Bronx NY (P)(PC)

Richard A. Lawhern, Ph.D., Co-Founder and Corresponding Secretary, Alliance for the Treatment of Intractable Pain. (P)

Katherine Lupton, MD, FACP. Associate Professor of Medicine, University of California San Francisco. (PC)

Theresa E Vettese, MD, FACP, Associate Professor, Division of General Medicine and Geriatrics, Emory University School of Medicine (P)

Marcus A Bachhuber, MD, MS, Assistant Professor, Division of General Internal Medicine, Montefiore Medical Center/Albert Einstein College of Medicine (A) (PC)

Robert G. Wahler, Jr. Pharm.D., BCGP, FASCP, CPE. Clinical Assistant Professor, University at Buffalo School of Pharmacy and Pharmaceutical Sciences; Director of Clinical Pharmacy Services, Niagara Hospice.

Erik K. Fromme, MD, MCR, FAAHPM. Director, Serious Illness Care Program, Ariadne Labs, a joint center between Brigham and Women's Hospital and the Harvard T.H. Chan School of Public Health, Boston, Massachusetts

Wendy Johnson, MD, MPH, Medical Director of La Familia Medical Center, Santa Fe, New Mexico. (PC)

Bridget Scullion, PharmD, BCOP. Director of Clinical Pharmacy Services, Dana-Farber Cancer Institute, Boston, MA; President, Society of Palliative Care Pharmacists (P)

Daniel R Holder Jr-PharmD

Dan Drew, MD (PC), Mount Shasta, California

Sarah Merritt, MD Lifestream Health Center, Bowie, Maryland (P) (A)

Douglas Brandoff, MD. Director, Opioid Safety and Compliance, and Attending Physician, Palliative Care Clinic, Dana-Farber Cancer Institute, Boston MA. Assistant Professor, Harvard Medical School. (Palliative Care)

Marie Ljosenvoor, PharmD. Cook Hospital & Care Center Pharmacy, Cook MN. (Palliative Care)

Paula J. Lum, MD, MPH, FASAM. Professor of Medicine, Division of HIV, Infectious Disease and Global Medicine, University of California, San Francisco and San Francisco General Hospital. (A)(PC)

Stephen G Henry, MD MSc, Assistant Professor of Internal Medicine; University of California Davis; Sacramento, California (PC)

Kyle P. Edmonds, MD FAAHPM, Assistant Professor of Palliative Medicine & Medical Director for Quality, Howell Palliative Teams, UC San Diego Health. (P, Palliative Care)

Rabia S. Atayee, PharmD, BCPS, Associate Professor of Clinical Pharmacy at UC San Diego Skaggs School of Pharmacy and Palliative Care Pharmacist at UC San Diego (P, Palliative Care)

James A. Tulsky, MD, Chair, Department of Psychosocial Oncology and Palliative Care, Dana-Farber Cancer Institute; Professor of Medicine, Harvard Medical School (P, Palliative Care)

Michael Picchioni, MD. Assistant Professor of Medicine, University of Massachusetts Medical School (P) (PC).

Scott M. Schulte, MSN, CRNA. Canton Potsdam Hospital, Potsdam, NY

Louise Silvern, Ph.D. Licensed Clinical Psychologist, Colorado Retired, Department of Psychology, University of Colorado, Boulder. Boulder, Colorado 80309. (P)

Matthew D. Harman, PharmD, MPH, Employer Benefit Consultant

Vicki Jackson, MD, MPH, Chief, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital, Associate Professor of Medicine, Harvard Medical School (P, Palliative Care)

Simone Rinaldi MSN, ANP-BC, ACHPN, Nursing Director, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital, Boston, MA

Emily Hurstak MD, MPH, MAS, Attending Physician, San Francisco Free Clinic and Staff Physician at Zuckerberg San Francisco General Hospital, San Francisco, CA. (A, P, PC)

Ryan Kraemer, MD, Associate Professor of Medicine, University of Alabama at Birmingham School of Medicine (PC)

Mark Stoltenberg, MD, MA, Attending Physician, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital, Clinical Instructor, Harvard Medical School (P, Palliative Care)

Sudha Natarajan, PhD, NP, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital (P, Palliative Care)

Eric B. Bass, MD, MPH, FACP, Professor of Medicine, Johns Hopkins University School of Medicine (PC)

Colleen T LaBelle MSN RN-BC, CARN Boston Medical Center Grayken Center for Addiction Medicine (A)

Ivan L. Goldsmith M.D. Medical Director Goldsmith Healthcare Las Vegas, Nevada 89148

Katherine Romp, MD. Associate Professor of Medicine, University of Alabama at Birmingham School of Medicine (PC)

Kurt V. Gold, MD, Fitness Research Institute, Omaha, NE (A) (P)

Gérard Coste, MD, Assistant Professor of Medicine, Harvard Medical School, (A,P,PC)

Kate Brizzi, MD, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital (P, Palliative Care)

Alicia Ventura, MPH, Director of Operations and Special Projects, Office Based Addiction Treatment, Boston Medical Center (A)

Sunil Kumar Aggarwal, MD, PhD, FAAPMR Clinical Instructor, University of Washington School of Medicine (P, PC)

Lorie N. Smith, MD, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital, Clinical Instructor, Harvard Medical School (P, Palliative Care)

Edward Bernstein M.D. Professor of Emergency Medicine, Boston University School of Medicine, Professor of Community Health Sciences, Boston University School of Public Health; Director Faster Paths to Treatment, Boston Medical Center. (A).

Amy Thomas, ANP-C, Health Care Resource Centers, Massachusetts (A)

Ioana Bica MD., Infectious Diseases, Boston Medical Center, Assistant Professor of Internal Medicine, Boston University School of Medicine (A, P)

Vimal Patel MD., ABAM diplomate, Hyannis Family Medical Care.

Marielle Baldwin, MD, MPH, Clinical Instructor, Department of Family Medical, Boston Medical Center

Laura A. Petrillo, MD, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital, Instructor, Harvard Medical School (P)

Theresa Maria Damien, PMHNP-BC, CARN-AP, McLean Hospital (A)

Howard L. Fields MD PhD, Professor of Neurology and Physiology Emeritus, University of California San Francisco (P)

Diana Coffa, MD, Director, Family and Community Medicine Residency Program and Core Faculty of Primary Care Addiction Medicine Fellowship, University of California, San Francisco (A, P, PC)

Bruce Scott, MD FACP HMDC, Program Director Palliative Medicine Fellowship, Washington Health System, Washington PA (P, PC, Palliative Care)

Janet Ho, MD MPH, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital (PC, P, Palliative care)

Phoebe Cushman, MD MS FACP, Assistant Professor of Internal Medicine, University of Massachusetts Medical School (PC, A, P)

Julian A. Mitton, MD MPH, Division of General Internal Medicine, Massachusetts General Hospital, and Instructor of Medicine, Harvard Medical School (PC, A)

Steven Z. Pantilat, MD, MHM, FAAHPM, Kates-Burnard and Hellman Distinguished Professor in Palliative Care, Director, Palliative Care Program, University of California, San Francisco

Sheryl Cifrino RN DNP Associate Professor Curry College School of Nursing, Curry College Milton, MA

George Saba, PhD, Associate Program Director, Family and Community Medicine Residency Program, University of California, San Francisco

Brianna Stein, MD, Assistant Clinical Professor, Family and Community Medicine, University of California, San Francisco

Deviney Chaponis, MD, Family Medicine, Director of Addiction Medicine, Beth Israel Deaconess HealthCare, Boston, MA

Michael Rabow, MD, Professor of Medicine and Urology, Department of Medicine, UCSF

Alexander Smith, MD, Associate Professor of Medicine, UCSF

Courtney Simmons, DNP, APN, FNP-BC, ACHPN, Primary & Palliative Care Nurse Practitioner, Primary Care Partners, Grand Junction, CO

Ruth A. Potee, MD, ABAM, Medical Director, Franklin Recovery Center and Franklin County House of Corrections, Greenfield, MA (PC) (A)

Katherine A. Gielissen, MD, General Internal Medicine Fellow in Medical Education, Internal Medicine-Pediatrics, Yale School of Medicine, New Haven, CT

Kevin Grumbach, MD, Professor and Chair, P Department of Family and Community Medicine, University of California, San Francisco (PC)

Naomi Wortis, MD, Clinical Professor, Department of Family and Community Medicine, University of California, San Francisco (PC)

Robert B. Hansen, M.D., Neurologic Disorders, Norfolk, VA

Lynn E. Taylor, MD, FACP, FAASLD, Research Professor, University of Rhode Island Director of HIV and Viral Hepatitis Services, CODAC Behavioral Health

Director, RI Defeats Hep C (PC)

Elizabeth M. Leach, RN, BSN, FNP Student, Simmons College, Hyannis Family Medical Care, Hyannis, MA (A)

Daniel S. Fierer, MD, FACP, Associate Professor, Icahn School of Medicine at Mount Sinai, New York, NY (PC)

Nelia Jain, MD, MA, Assistant Professor, Section of Palliative Care, Rush University Medical Center, Chicago (P, Palliative Care)

Erin Scott, MD, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital, Clinical Instructor, Harvard Medical School (P, Palliative Care)

Ronald Goldschmidt, MD. Department of Family and Community Medicine, University of California San Francisco (PC)

Alev J. Atalay, MD. Department of Medicine, Brigham and Women's Hospital, Instructor of Medicine, Harvard Medical School (PC)

Ashley Cannon Deringer, ANP-BC, ACHPN, Palliative Nurse Practitioner, Northeast Georgia Health System, Gainesville, GA

Sarah H. Adkins MD, Assistant Professor of Medicine, Department of Medicine, UCSF (Palliative Care)

Chad D. Kollas MD FACP FAAHPM, Medical Director, Palliative & Supportive Care, Orlando Health UFHealth Cancer Center, Orlando, FL

Benjamin S. Kematich, PharmD, Clinical Pharmacy Specialist- Palliative Care, Dana-Farber Cancer Institute, Boston, MA (Palliative Care)

Christine Dehlendorf, MD MAS, Associate Professor, Departments of Family & Community Medicine; Obstetrics, Gynecology & Reproductive Sciences; and Epidemiology & Biostatistics, University of California, San Francisco, San Francisco, CA

Ellie Grossman, MD MPH; Instructor, Harvard Medical School; Primary care lead for behavioral health integration, Cambridge Health Alliance, Somerville MA (A, PC, ABAM diplomate)

Margaret Lowenstein, MD, MPhil, National Clinician Scholars Program Fellow, Department of Medicine, University of Pennsylvania, Philadelphia, PA (PC)

Jennifer Shin, MD, MPH, Instructor, Division of Palliative Care and Geriatric Medicine, Massachusetts General Hospital, Harvard Medical School (P, Palliative Care)

BJ Miller MD. Asst Professor Clinical Medicine, University of California, San Francisco.

James F Cleary MD, Professor of Medicine, University of Wisconsin School of Medicine and Public Health, Madison Wisconsin.

Lynn Flint, MD, Associate Professor, Division of Geriatrics, University of California, San Francisco

Lucy M. Candib, MD, Professor, Department of Family Medicine and Community Health, University of Massachusetts Medical School (PC)

Claritza Ríos, MD, Director of Palliative Care Service, Call9 Medical, Brooklyn NY

Lori Siegel, PhD, Department of Psychiatry, Allegheny General Hospital, Pittsburgh, PA (A)

Susan D. Smith, MD, Associate Professor Family and Community Medicine, UCSF, San Francisco, CA

Norman W. Rizk, MD, Chief Medical Officer, Stanford Health Care

Zachary S. Sager, MD, MA, Palliative Medicine Fellow, Beth Israel Deaconess Medical Center, Boston MA

Marcia Glass, MD, Associate Professor of Internal Medicine, Tulane University School of Medicine, New Orleans, LA

Zoe M. Weinstein, MD, MS; Assistant Professor, Boston University School of Medicine; Director, Boston Medical Center Addiction Consult Service, Boston MA (A) (PC)

Julia Lindenberg MD, Instructor, Division of General Medicine and Primary Care, Beth Israel Deaconess Medical Center, Harvard Medical School (PC)

Robert L. Cook, MD, MPH. Professor, University of Florida, Gainesville FL (P, PC)

Liz O'Dair, MD, MPH. Physician, Holyoke Health Center, Holyoke, MA

Jonathan Giftos AAHIVS, Clinical Instructor of Medicine, Albert Einstein College of Medicine (A)

Sophia Mendez, RN, BSN; OBAT nurse, New Health Charlestown, Charlestown, MA

Sharad Jain, MD; Professor of Medicine and Associate Dean for Students, UC Davis School of Medicine (PC)

Anne Kinderman, MD; Associate Professor of Medicine, University of California San Francisco; Director, Supportive & Palliative Care Service, Zuckerberg San Francisco General Hospital

Daniel Wlodarczyk MD, FACP, Professor of Clinical Medicine, University of California San Francisco, Attending Physician Positive Health Program Zuckerberg San Francisco General Hospital

Caroline Olney, BS RN MSN NP ACHPN  
Palliative Care Nurse Practitioner, University of California San Francisco, Supportive & Palliative Care Service, Zuckerberg San Francisco General Hospital

William M. Tierney, MD, MACP, FACMI, FRCP  
Professor and Founding Chair, Department of Population Health  
Dell Medical School, University of Texas at Austin

Heidi Reetz, MD, Assistant Clinical Professor, University of California San Francisco, Attending Physician at UCSF Pain Management Center, (A, P, PC)

Richard N Rosenthal, MD, DLFAPA, DFAAAP, FASAM  
Professor of Psychiatry, and Director, Division of Addiction Psychiatry, Stony Brook University School of Medicine, Stony Brook, NY (A)

Christopher W. Shanahan MD MPH FACP  
Assistant Professor of Medicine  
Director of Community Medicine  
Boston University School of Medicine, Boston, MA

Daniel Winetsky, MD, MS  
Clinical Fellow in Infectious Diseases  
Columbia University Medical Center

Laxminarsimha Reddy, MD, Clinical Assistant Professor, Division of General Internal Medicine, University of Washington; Medical Director of VA Puget Sound Homeless Patient Aligned Care Team (PC)

James B. Kernan, RN, MPIA, CARN  
Board of Directors, American Nurses Association - Massachusetts;  
Naphcare, Essex County Sheriff's Department, Middleton, MA.

Inga M. Dawson, RN CCRN, Chronic Pain Patient/Intractable Pain Patient Advocate in Maryland

Sherry L Sherman CRNP, MSN, BSN, RN Atlantic Cape College 1985

Marlisa Griffith, RN, BSN, Arkansas

Marlene Martin, MD, Assistant Clinical Professor, Division of Hospital Medicine, University of California, San Francisco and Zuckerberg San Francisco General Hospital. (A)

Carly Zapata, MD MPH, Assistant Clinical Professor, Hospice and Palliative Medicine, Division of Hospital Medicine, University of California, San Francisco.

Laila Khalid MD MPH, Assistant Professor, Albert Einstein School of Medicine, Montefiore Medical Center, NY

Lydia Leung, MD, Associate Clinical Professor, University of California San Francisco; Associated Residency Director, University of California San Francisco Family and Community Residency Program; Medical Director, Family Health Center at Zuckerberg San Francisco General Hospital.

Philip Triffletti MD, MS, Instructor of Medicine, Harvard Medical School, Medical Director for Health Care Quality Beth Israel Deaconess HealthCare, Boston, MA

Michael Nathan, MD, Instructor in Medicine, Harvard Medical School, Adult Primary Care, Mass General Hospital, Boston, MA (PC)

Janet Grochowski, PharmD, BCPS, Division of HIV, Infectious Disease and Global Medicine, University of California, San Francisco and San Francisco General Hospital.

Sarah M. Bagley MD, MSc, Assistant Professor of Medicine and Pediatrics, Boston University School of Medicine, Boston Medical Center, Boston, MA

Michael S. Sinha, MD, JD, MPH, Department of Medicine, Brigham and Women's Hospital, Boston, MA

Deborah Kiley, NP-C ,DNP, FAANP, Fearless Wellness LLC, Anchorage, Alaska (P,PC)

Danial Laird, MD, JD, Medical Director, Flamingo Pain Specialists, PLLC, Las Vegas, NV

Debbie L. Mann BSN, RN Indiana

Linda S Bluestein MD. Associate Professor of Anesthesiology, Medical College of Wisconsin, Central Wisconsin. Pain Management.

Jennifer Hart, RN, BSN, Oklahoma

Richard H. Barrett, II, Ph.D., Clinical Psychologist in private practice in Arkansas. Pain management, addictions, PTSD.

Valerie J. Wright, Pharm D

Michael F. Bierer MD MPH (A, PC) Asst Prof Medicine at Harvard Medical School; Physician, Massachusetts General Hospital, both in Boston, Massachusetts.

Gary L. Green, LMFT, LPC, MS  
Arkansas private practice

### *Note*

ABAM: Diplomate, American Board of Addiction Medicine  
ADM: Diplomate in Alcohol Drug Medicine under the American Board of Addiction Medicine  
FASAM: Fellow of the American Society of Addiction Medicine  
FACOG: Fellow of the American College of Obstetrics and Gynecology  
MACP: Master of the American College of Physicians  
FAPA: Fellow of the American Psychiatric Association  
FAPM: Fellow of the Academy of Psychosomatic Medicine  
DABPM: Diplomate, American Board of Pain Medicine  
CPE: Certified Pain Educator  
BCGP: Board Certified Geriatric Pharmacist  
BCPS: Board Certified Pharmacotherapy Specialist  
BCACP: Board Certified Ambulatory Care Pharmacist  
FASCP: Fellow, American Society of Consultant Pharmacists  
FAAHPM: Fellow of the American Academy of Hospice & Palliative Medicine  
FAAPMR: Fellow of the American Academy of Physical Medicine & Rehabilitation  
FAAAP: Fellow of the American Academy of Addiction Psychiatry  
FACP: Fellow of the American College of Physicians

### **References:**

1. Centers for Medicare & Medicaid Services. Advance Notice of Methodological Changes for Calendar Year (CY) 2019 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies and 2019 draft Call Letter, CMS-2017-0163-0007. Washington, DC; 2018.
2. U.S. Department of Health and Human Services (HHS) Office of the Inspector General. Opioids in Medicare Part D: Concerns about Extreme Use and Questionable Prescribing.

Washington, DC: United States Department of Health and Human Services; 2017 July 2017.  
<https://oig.hhs.gov/oei/reports/oei-02-17-00250.pdf> Accessed February 25, 2018.

3. Dowell D, Haegerich TM, Chou R. CDC Guideline for Prescribing Opioids for Chronic Pain — United States, 2016. *MMWR Morb Mortal Wkly Rep*. 2016;65(1):1-49.

4. Frank JW, Lovejoy TI, Becker WC, Morasco BJ, Koenig CJ, Hoffercker L, et al. Patient Outcomes in Dose Reduction or Discontinuation of Long-Term Opioid Therapy: A Systematic Review. *Ann Intern Med*. 2017;167(3):181-91.

5. Kertesz SG, Satel SL, Gordon AJ. Opioid Prescription Control: When The Corrective Goes Too Far: *Health Affairs*; 2018 January 19, 2018.

<https://www.healthaffairs.org/action/showDoPubSecure?doi=10.1377%2Fhblog20180117.832392&format=full&> Accessed March 4, 2018 .

6. Kertesz SG, Satel SS

2017;Pages[http://www.slate.com/articles/health\\_and\\_science/medical\\_examiner/2017/08/cutting\\_down\\_on\\_opioids\\_has\\_made\\_life\\_miserable\\_for\\_chronic\\_pain\\_patients.html](http://www.slate.com/articles/health_and_science/medical_examiner/2017/08/cutting_down_on_opioids_has_made_life_miserable_for_chronic_pain_patients.html) on August 23, 2017 .

7. Hamilton K. The Crackdown on Painkillers is Killing People: *Vice.com*; 2017 November 9, 2017. <https://news.vice.com/story/how-the-crackdown-on-painkillers-is-killing-people> Accessed November 28, 2017.

8. Weeks WB. Hailey. *JAMA*. 2016;316(19):1975-76.

9. National Conference of State Legislatures. Prescribing Policies: States Confront Opioid Overdose Epidemic. Washington, DC 2017 August.

[http://www.ncsl.org/Portals/1/Documents/Health/prescribingOpioids\\_final01-web.pdf](http://www.ncsl.org/Portals/1/Documents/Health/prescribingOpioids_final01-web.pdf) Accessed December 25, 2017.

10. CDC National Center for Injury Prevention and in Control. Annual Surveillance Report of Drug-Reported Risks and Outcomes. Atlanta, GA: Centers for Disease Control and Prevention; 2017. <https://www.cdc.gov/drugoverdose/pdf/pubs/2017-cdc-drug-surveillance-report.pdf> Accessed December 23, 2017.