Year of the Locusts: The CDC Guidelines Impact on Practitioners and Patients

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Disclosures

- Nothing to disclose
Learning Objectives

- Cite the multifactorial issues contributing to the opioid crisis
- Describe how the politicians, state and federal laws have conspired to help destroy the lives of chronic noncancer pain patients and increase patient deaths from overdose and suicide
- Identify clinical alternatives to treat these patients without dealing with more opioids and overdose deaths

Topic Agenda

- The current situation
- How the guidelines were developed
- Who they were developed for
- Opioid analgesic overdoses
- Opioid tapering
- The real opioid crisis: heroin and fentanyl
The Facts

AAPM Facts and Figures on Pain

- Pain affects more Americans than diabetes (25.8M), heart disease (16.3M), CVA (7.0 M) and cancer (11.9M) combined\(^2,3,4\)
- There are 100M Americans with chronic pain\(^2\)
- Total annual cost of health care due to pain ranges from $560 billion to $635 billion (in 2010 dollars)\(^2\)
- Although therapies are present to alleviate most pain for those dying of cancer, research shows that 50%-75% of patients die in moderate to severe pain\(^5\)
Fact References


5. A Controlled Trial to Improve Care for Seriously Ill Hospitalized Patients. http://jama.ama-assn.org/cgi/content/abstract/274/20/1591

The CDC Guidelines
CDC Guidelines for Prescribing Opioids for Chronic Pain – United States, 2016

- From 1999 to 2014 greater than 165,000 deaths from opioid overdose from opioid pain meds (alone or in combination) in the US
- In 2014, 14,000 people died from prescription opioids (prescribed and not prescribed)
- Most commonly implicated: methadone, oxycodone, and hydrocodone (CII in 2014)
- Opioid naïve: no consistent daily opioids for at least 1 week (same doses, same intervals, same opioid)
- Opioid tolerant: opioid use ≥7d (morphine 60 mg/d, oxymorphone 20 mg/d, oxycodone 30 mg/d, hydromorphone 8 mg/d, (hydrocodone 40 mg/d, tapentadol 300 mg/d, fentanyl transdermal 25 mcg)
- If no legal pain medication obtainable, heroin is easy to find
- CDC Guideline for Prescribing Opioids for Chronic Pain — United States, 2016
  Recommendations and Reports / March 18, 2016 / 65(1);1-49

Intent of CDC Guideline

- Chronic persistent pain variously defined as persistent pain >3 months or past the time of normal tissue healing
- Few studies rigorously assess the long term benefits of opioids for chronic pain with outcomes examined at least 1 year later
- Guideline intent to improve communication between clinicians and patients
- RE: risks vs benefits of opioids for chronic pain, improve safety/effectiveness of pain treatment, reduce risks associated with long term opioid therapy
Intent of CDC Guideline (cont’d)

- CDC guidelines provide “recommendations” for the prescribing of opioid pain medication by primary care clinicians for chronic pain (>3 months or past the time of normal tissues healing) in outpatient settings exclusive of active cancer treatment, palliative care, and end of life care

There is abundant evidence for use of opioid analgesics for chronic pain

12 Recommendations for Consideration (Annotated) from the CDC

Grouped into 3 areas for consideration
1. Determine when to initiate or continue opioids for chronic pain
2. Opioid selection: process, dosage, follow up, and discontinuation
3. Risk assessment and addressing harms of opioid use

EBM

- Type 1 evidence: Randomized clinical trials/overwhelming evidence from observational studies.
- Type 2 evidence: Randomized clinical trials with important limitations, or exceptionally strong evidence from observational studies.
- Type 3 evidence: Observational studies or randomized clinical trials with notable limitations.
- Type 4 evidence: Clinical experience and observations, observational studies with important limitations, or randomized clinical trials with several major limitations
Results:

- Recommendations 1-11
  - All 3 (Weak Evidence) or 4 (Very Weak Evidence)
- Only Recommendation 12
  - 2 (Strong Evidence)

What are Morphine Milligram Equivalents (MME) or MED, OME?

- Definition and purpose of MME
- MME, also called morphine equivalent dosing (MED) or oral morphine equivalent (OME), provides a means of comparing doses of analgesics with different potencies and mechanisms of action (MOA)¹
- Equianalgesic doses of different opioids provide comparable analgesic efficacy
- Because MME is based on equianalgesia, it can be applied to non-opioids
- Morphine milligram equivalents (MME)/day; the amount of morphine an opioid dose is equal to when prescribed, often used as a gauge of the abuse and overdose potential of the amount of opioid that is being given at a particular time²

MEDD—Ethics

- “As the intent of publishing these conversion factors is to offer a transparent method to calculate (oral morphine equivalents) for research purposes, these calculations do not reflect these individual factors that may be important in clinical practice.”

- Or, to put it another way, is your 50 MEDD (morphine equivalent daily dosage) for your 150 lb patient the same as mine for my 300 lb patient???

- Do such issues deal with the type of injury (bio), the concerns (psycho), and experience (social) of the patients?

The CDC Guideline: MME Doses for Commonly Prescribed Opioids

Equianalgesic dose conversions are only estimates and cannot account for individual variability in genetics and pharmacokinetics

<table>
<thead>
<tr>
<th>Drug</th>
<th>Equianalgesic Dose Conversion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Codeine</td>
<td>0.15</td>
</tr>
<tr>
<td>Fentanyl transdermal (in mcg/hr)</td>
<td>2.4</td>
</tr>
<tr>
<td>Hydrocodone</td>
<td>1</td>
</tr>
<tr>
<td>Hydromorphone</td>
<td>4</td>
</tr>
<tr>
<td>Methadone</td>
<td></td>
</tr>
<tr>
<td>1-20 mg/day</td>
<td>4</td>
</tr>
<tr>
<td>21-40 mg/day</td>
<td>8</td>
</tr>
<tr>
<td>41-60 mg/day</td>
<td>10</td>
</tr>
<tr>
<td>≥61-80 mg/day</td>
<td>12</td>
</tr>
<tr>
<td>Morphine</td>
<td>1</td>
</tr>
<tr>
<td>Oxycodone</td>
<td>1.5</td>
</tr>
<tr>
<td>Oxymorphone</td>
<td>3</td>
</tr>
<tr>
<td>Tapentadol</td>
<td>0.4</td>
</tr>
</tbody>
</table>
Coda

- Tapentadol is a mu receptor agonist and norepinephrine reuptake inhibitor. MMEs are based on mu-receptor agonist activity, but it is unknown if this drug is associated with overdose in the same dose dependent manner as observed with medications that are solely mu receptor agonists.
  - Dowell D, Haegerich TM, Chou R, CDC Guidelines for Prescribing Opioid for Chronic Pain- United States, 2015
  - MMWR Recomm Rep 2016; 65(No. RR-1)-1-49

CDC Guideline MME Equivalence

What is the 90 MME/Day for tapentadol?
The MME/day is calculated by taking the morphine amount (90 mg) and dividing it by the MME of tapentadol (0.4) stated in the CDC guideline. For example, 90 mg of morphine per day/0.4 = 225 mg Tapentadol per day.

Calculations of MME for tapentadol

How much would 50 mg of morphine translate to for tapentadol using the CDC 0.4 MME? Divide the total daily dose of morphine by 0.4 to get the total daily dose of tapentadol.
Example: 50 mg/day morphine ÷ 0.4 = 125 mg/day of tapentadol
CDC Guideline MME Equivalence (cont’d)

Calculations to remember using the CDC 0.4 MME for tapentadol:
90 mg of morphine = 225 mg/day tapentadol
100 mg of morphine = 250 mg/day tapentadol
120 mg of morphine = 300 mg/day tapentadol

- Tapentadol is a mu receptor agonist and norepinephrine reuptake inhibitor. MMEs are based on mu-receptor agonist activity, but it is unknown if this drug is associated with overdose in the same dose-dependent manner as observed with medications that are solely mu receptor agonists.
- The FDA approved maximum daily dosage limit for NUCYNTA ER is 500 mg/day (250 mg/q12h)
- The FDA approved maximum daily dosage limit for NUCYNTA is 600 mg/day (700 mg on Day 1)


Really?

- 2012, 259 million prescriptions for opioid pain medications written
- In 2014, almost 2 million people abused and/or were dependent on prescription medications
- 1 in 4 (25%) individuals receiving prescribed opioids for noncancer pain in a primary care setting may present with addiction issues
- Daily, 1000 ER encounters for misusing prescription opioids (independently or co-ingestion with other substances)
- PCPs prescribe 52% of opioids to chronic pain patient (2007/2008)

- CDC Guideline for Prescribing Opioids for Chronic Pain — United States, 2016 Recommendations and Reports / March 18, 2016 / 65(1);1-49
Increased risk of overdose
- Benzodiazepines
- Sleep apnea or sleep disorders of breathing
- Older patients
- Pregnant women
- Depression or other mental health issues
- Alcohol or substance use disorders

"Equianalgesic" Opioid Dosing

<table>
<thead>
<tr>
<th>Drug</th>
<th>Equianalgesic Doses (mg)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Parenteral</td>
</tr>
<tr>
<td>Morphine</td>
<td>10</td>
</tr>
<tr>
<td>Buprenorphine</td>
<td>0.3</td>
</tr>
<tr>
<td>Codeine</td>
<td>No longer available, SC Avoid Use</td>
</tr>
<tr>
<td>Fentanyl</td>
<td>0.1 (12.5 to 25 mcg transdermal)</td>
</tr>
<tr>
<td>Hydrocodone</td>
<td>NA</td>
</tr>
<tr>
<td>Hydromorphone</td>
<td>1.3 to 1.5</td>
</tr>
<tr>
<td>Meperidine</td>
<td>75</td>
</tr>
<tr>
<td>Oxycodone</td>
<td>10 (Not yet available in USA)</td>
</tr>
<tr>
<td>Oxymorphone</td>
<td>1</td>
</tr>
<tr>
<td>Tramadol</td>
<td>Not Determined, Not Yet Available</td>
</tr>
<tr>
<td>Tapentadol</td>
<td>Not Available</td>
</tr>
</tbody>
</table>

Note: Caution is advised in utilizing such tables and the tables are for initial use only.


Caution!

- Ask Dr. Google: opioid equianalgesic charts differ widely (just look at them and compare... they can be very different)
- They are a major cause of overdose and death! (and the patients don’t use them)
What’s Missing from the CDC Guidelines?

- The guideline is clearly oriented toward “new” patients, rather than giving guidance to clinicians as to what to do with patients who were placed on opioids prior to our awareness of these risks.
- What do you do with the “inherited pain patient” who is already on doses well in excess of the 90 MME/day dose recommendations and who is functioning well, meeting all goals and expectations?

How NOT to Develop Guidelines

- Have a total lack of iterative evaluation
  - Don’t track to see what consequences, intended and unintended, are found and fix (change) the guidelines
- Make guidelines, which are recommendations, into law, freezing them to where they couldn’t be changed without significant legal activity
- Refuse to notice the problems the guidelines/recommendations are causing and still refuse to amend them
  - Significant issues with lack of function from increased pain secondary to marked decreases in opioids (agreed upon or forced)
  - Increased suicide following opioid discontinuation or marked decrement
  - “Recommendations”, yet unproven, which are made into law

www.who.int/hiv/topics/mtd/gtc_handbook_mar2010_1.pdf
Using Opiates

- Healthcare providers through their training and experience as well as their oath to relieve suffering must be able to:
  - Learn how to select patients for opioid therapy, when indicated
  - Manage patients on opioid therapy as safely and effectively as possible
Opioid Analgesic Overdoses

Opioid Analgesic Overdoses = Public Health Epidemic

- Opioid analgesics are among the most commonly misused or abused pharmaceuticals
  - Not counted here is the result of using the CDC guidelines, as well as physicians “dropping out of the system”
  - When chronic pain patients can’t legally obtain their “previously” prescribed opioid medications (being cut per the CDC guidelines, their physicians stopping prescribing opioids) some do turn to heroin—it’s cheap and available
- Overdose deaths from prescription painkillers have increased –16,651 in 2010; >4x # in 1999 but it has decreased after that, after increasing 13% annually from 1999-2009, the death rate increase from prescription opioids has remained steady at 3% per year since 2009


Painweek
High Risks Include:

- Sleep apnea (OSA)/sleep disordered breathing
- Renal or hepatic insufficiency
- Older adults
- Pregnant women
- Depression and/or other DSM-V diagnoses
- Alcohol and/or other substance use disorders


Factors That May Skew Estimates of Overdose Deaths Attributed to Specific Drugs, Specifically Opioids

1. At autopsy, the substances tested for and circumstances under which tests are performed to determine which drugs are present might vary by jurisdiction and over time
2. The % of deaths with specific drugs identified on the death certificate varies by jurisdiction and over time
   1. Nationally, 19% (in 2014) and 17% (in 2015) of drug overdose death certificates did not include the specific types of drugs involved
   2. In addition, the % of drug overdose deaths with specific drugs identified on the death certificate varies widely by state, ranging from 47.4% to 99%.
3. Variations in reporting across states prevent comparison of rates between states
Hot of the Presses-1

- Seth et al (2018) and 3 other members of the CDCs Division of Unintentional Injury stated (Am J Pub Health):
  - Many overdoses involving illicit fentanyl and other illicit opioids have been counted as prescription related drug deaths
  - “Availability of illicitly manufactured synthetic opioids (e.g. fentanyl) that traditionally were prescription medications has increased. This has blurred the lines between prescription and illicit opioid-involved deaths.”

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Hot off the Presses-2

- “Traditionally, the CDC and others have included synthetic opioid deaths in estimates of “rescription opioid deaths. However, with IMF (illicitly manufactured fentanyl and derivatives) likely being involved more recently estimating prescription opioid-involved deaths with the inclusion of synthetic opioid-involved deaths could significantly inflate estimates.”
Hot of the Presses-3

- How much overestimation?
- Using the CDC’s “Traditional Definition” for prescription opioids, the CDC estimated 32,445 American died from overdoses of pain medication in 2016.
- They then pronounced, using a new “conservative definition”- one that excluded the “high proportion of deaths involving synthetic opioids like fentanyl-like compounds- the death toll associated with prescription opioids was cut nearly in half to 17,087 overdoses.

Hot off the Presses-4

- The decreased number may also be incorrect secondary to other issues, per these researchers:
- The number of deaths involving diverted prescriptions or counterfit drugs is unknown: toxicology tests cannot distinguish between pharmaceutical fentanyl and illicit fentanyl;
- Drugs are not specifically identified on death certificates in 20% of overdose deaths
- Multiple drugs are involved in almost half of drug overdose deaths
Hot off the Presses and in your face!

- If we can’t get real, factual information about the problem, how can we fix the problem???

Factors that may Skew Estimates of Overdose Deaths Attributed to Specific Drugs, Specifically Opioids-2

1. Improvements in testing and reporting of specific drugs might have contributed to some observed increases in opioid-involved death rates
2. Because heroin and morphine are metabolized similarly, some heroin deaths might have been misclassified as morphine deaths, resulting in underreporting of heroin deaths
3. The state-specific analyses of opioid deaths are restricted to 28 states, limiting generalizability

Then what Happened?
An Orgy of Breast Beating

- Since the CDC Guidelines became “Next to law”
  - The docs who have used opioids for years have “reconsidered”
  - All of a sudden, opioids are not appropriate and it’s perfectly reasonable to halve or decrease even further the opioids of stable, functional, chronic pain patients who need more than the CDC prescribed MMEs
  - Hyperalgesia, seen in animals, has been a “good reason” to not use opioids in humans-without EBM
  - Many docs using the CDC Guidelines as an excuse stopped prescribing opioids- and more will
  - Docs who used opioids for decades suddenly decided that opioids were “the Devil”
How to avoid the opioid prescriber dragnet

- Curated by: Jan Greene for Univadis
- March 02, 2018
- Takeaway

- Physicians who prescribe opioids need to avoid certain red flags that could draw the attention of prosecutors and state medical board officials cracking down on doctors they believe are feeding the opioid overdose crisis.

- Pittsburgh attorney Efrem M. Grail, a former prosecutor who now defends medical providers, offers tips in a Physicians Practice article:

Avoiding the Prescriber Dragnet-1

- Keep records documenting diagnosis, treatment, and overall care of patients receiving opioid prescriptions.
- Ensure the chart demonstrates an in-depth examination has taken place.
- Be aware of whether the practice's appointment list appears to reflect an unreasonably large number of patients in a single day who couldn't all be seen properly.
- Always write prescriptions with the patient in front of you, and don't sign them for staff to fill out later.
- Avoid manually dispensing narcotics from the office if possible.
- Don't prescribe controlled substances for yourself, immediate family, friends, or neighbors.
- Don't write a prescription for a controlled substance without examining a new patient first, in person.
Who Else?

- CMS has adopted the CDC Guidelines and this effects Medicare Part D

Again, So What?

- NC Board adopts CDC opioid guidelines
- At its January 2017 meeting, the Board voted to adopt the CDC Guideline for Prescribing Opioids for Chronic Pain. This document, which was developed in 2016 by the U.S. Centers for Disease Control and Prevention, replaces the Board’s previous opioid position statement, effective immediately.

https://www.ncmedboard.org/resources-information/professional-resources/laws-rules-position-statements/position-statements/Policy_for_the_use_of_opiates_for_the_treatment_of_pain
DEA Reduces Amount of Opioid Controlled Substances to be Manufactured in 2017 and 2018

- It hasn’t helped that the DEA has restricted 2017 opiate production to 75% of the production in 2016, and has decreased it again by 20% in 2018.
  - OCT 04 (WASHINGTON) - The United States Drug Enforcement Administration (DEA) has reduced the amount of almost every Schedule II opiate and opioid medication that may be manufactured in the United States in 2017 by 25 percent or more, according to a Final Order being published in the Federal Register tomorrow and available for public inspection today. A handful of medicines were reduced by more, such as hydrocodone, which will be 66 percent of last year’s level.

Survey on the impact of the CDC's opioid prescribing guidelines.

- The online survey of 3,108 pain patients, 43 doctors and 235 other healthcare providers was conducted between February 15 and March 11, 2017 BY Pain News Network and the International Pain Foundation (iPain)
  - Questions Q3 through Q10 were answered by pain patients only, while Q11 through Q19 were answered by doctors and healthcare providers
Pain News Network Survey! Survey Says:

- Survey findings:
  - The Guideline harmed pain patients, reduced access to pain care and failed to reduce drug abuse and overdoses
  - Over 70% of pain patients say that they are no longer prescribed opioid medication or are getting a lower dose
  - 8 out of 10 patients say their pain and quality of life are worse
  - 84.23% of patients- “I have more pain and my quality of life is worse”
  - 42.08% - “I have considered suicide because my pain is poorly treated”

The Goal:

- We must prescribe and create a patient-specific, patient-focused, patient-centered personalized treatment plan for all pain/headache patients
Unintended Consequences:

- Individuals with pain had a 29% increased risk of dying, while those who reported “quite a bit” or “extreme” pain had a 38% and 88% increased risk of dying respectively. The study showed it was not the pain itself that increases the risk of death, but the amount of disruption of everyday living linked to having long-term pain.

- Persistent pain was associated with faster memory decline and increased probability of dementia.

- Osteoarthritis and related joint pain were strongly associated with memory loss.


Opioid Tapering
PROP Founder Calls for Forced Opioid Tapering

July 20, 2017

By Pat Anson, Editor

Have you or a loved one been harmed by being tapered off high doses of opioid pain medication?

The founder of an anti-opioid activist group wants to know – or at least he posed the question during a debate about opioid tapering with colleagues on Twitter this week.

“Outside of palliative care, dangerously high doses should be reduced even if patient refuses. Where exactly is this done in a risky way?” wrote Andrew Kolodny, MD, Executive Director of Physicians for

Prop Founder Calls for Forced Opioid Tapering-1

Andrew Kolodny

3,333 Tweets

TWEETS TWEETS & REPLIES MEDIA LIKES

Andrew Kolodny @andrewkolod... 14h

Replying to @LeoBeletsky @StefanKertesz and @DavidJuurlink

Outside of palliative care, dangerously high doses should be reduced even if patient refuses. Where exactly is this done in a risky way?
Forced Opioid Tapering-2

- About 10 million Americans (of about 100M chronic pain patients) take opioid medication daily for chronic pain, and many are being weaned or tapered to lower doses -- some willingly, some not -- because of fears that high doses can lead to addiction and overdose.
  - The question is really, Whose Fears???
  - Yes, there is an Overdose “Crisis” but it appears to be driven by both political and societal forces, not medical issues

Forced Opioid Tapering-3

- Kolodny’s Twitter posts were triggered by recent research published in the Annals of Internal Medicine- 67 clinical studies on the safety and effectiveness of opioid tapering were evaluated. Most of those studies were considered very poor quality.

- “Although confidence is limited by the very low quality of evidence overall, findings from this systematic review suggest that pain, function, and quality of life may improve during and after opioid dose reduction,” wrote co-author Erin Krebs, MD, of the Minneapolis Veterans Affairs Health Care System.

- Krebs was an original member of the “Core Expert Group” – an advisory panel that secretly helped draft the CDC opioid prescribing guidelines with a good deal of input from PROP. She also appeared in a lecture series on opioid prescribing that was funded by the Steve Rummler Hope Foundation, which coincidentally is the fiscal sponsor of PROP.

  Anson P, PainNewsNetwork, July 20, 2017
Forced Opioid Tapering-4

- Curiously, while Krebs and her colleagues were willing to accept poor quality evidence about the benefits of tapering, they were not as eager to accept poor evidence of the risks associated with tapering.
  - Not to forget- the very poor level of EBM found in the CDC Guidelines

- “This review found insufficient evidence on adverse events related to opioid tapering, such as accidental overdose if patients resume use of high-dose opioids or switch to illicit opioid sources or onset of suicidality or other mental health systems,” wrote Krebs.

- But the risk of suicide is not be taken lightly

Anson P, PainNewsNetwork, July 20, 2017

Forced Opioid Tapering-5

- And what about Kolodny’s contention that high opioid doses should be reduced even if a patient refuses? Not a good idea, according to a top CDC official, who says patient “buy-in” and collaboration is important if tapering is to be successful.

- “Neither (Kreb’s) review nor CDC’s guideline provides support for involuntary or precipitous tapering. Such practice could be associated with withdrawal symptoms, damage to the clinician–patient relationship, and patients obtaining opioids from other sources,” wrote Deborah Dowell, MD, a CDC Senior Medical Advisor, in an editorial in the Annals of Internal Medicine. “Clinicians have a responsibility to carefully manage opioid therapy and not abandon patients in chronic pain. Obtaining patient buy-in before tapering is a critical and not insurmountable task.”

Anson P, PainNewsNetwork, July 20, 2017
Forced Opioid Tapering-5 (cont’d)

- The CDC guideline also stresses that tapering should be done slowly and with patient input.
- “For patients who agree to taper opioids to lower dosages, clinicians should collaborate with the patient on a tapering plan,” the guideline states. “Experts noted that patients tapering opioids after taking them for years might require very slow opioid tapers as well as pauses in the taper to allow gradual accommodation to lower opioid dosages.”
- Yet, patients are being detoxed against their wishes, and physicians are fleeing the field, refusing to provide pain medication for these patients.

Anson P, PainNewsNetwork, July 20, 2017

Forced Opioid Tapering-6

- The CDC recommends a "go slow" approach and individualized treatment when patients are tapered. A "reasonable starting point" would be 10% of the original dose per week, according to the CDC, and patients who have been on opioids for a long time should have even slower tapers of 10% a month.
- The Department of Veterans Affairs takes a more aggressive approach to tapering, recommending tapers of 5% to 20% every four weeks, although in some high dose cases the VA says an initial rapid taper of 20% to 50% a day is needed. If a veteran resists tapering, VA doctors are advised to request mental health support and consider the possibility that the patient has an opioid use disorder.

Anson P, PainNewsNetwork, July 20, 2017
Forced Opioid Tapering-7

- It is eye-opening, especially for nonphysicians and nonpain patients to read the responses to this article
- To get a real feel for this, go to: https://www.painnewsnetwork.org/stories/2017/7/20/prop-founder-calls-for-forced-opioid-tapering?rq=andrewkolodny

A Recent Example- A “Leading Pain Physician”

- Started a mandatory opioid taper of 100 patients as he was going to retire
- He noted “Reaction from patients has been less enthusiastic than I had hoped. Many have refused to comply with even starting a tapering program.”
  - Possibly secondary to a combination of fear and reluctance on the part of patients who had used opioids for a long time
- Of interest, the physician noted that he was surprised that the insurance companies were not cooperating with reducing patients’ opioid doses (This was prior to the CVS decision)

40,000 deaths in USA caused by aspirin and painkillers every year!

- Conservative calculations estimate that approximately 107,000 patients are hospitalized annually for nonsteroidal anti-inflammatory drug (NSAID)-related gastrointestinal (GI) complications and at least 16,500 NSAID-related deaths occur each year among arthritis patients alone.
  
  "It has been estimated conservatively that 16,500 NSAID-related deaths occur among patients with rheumatoid arthritis or osteoarthritis every year in the United States. This figure is similar to the number of deaths from the acquired immunodeficiency syndrome and considerably greater than the number of deaths from multiple myeloma, asthma, cervical cancer, or Hodgkin's disease. If deaths from gastrointestinal toxic effects from NSAIDs were tabulated separately in the National Vital Statistics reports, these effects would constitute the 15th most common cause of death in the United States. Yet these toxic effects remain mainly a "silent epidemic," with many physicians and most patients unaware of the magnitude of the problem. Furthermore the mortality statistics do not include deaths ascribed to the use of over-the-counter NSAIDS." (Wolfe M. MD, Lichtenstein D. MD, and Singh Gurkirpal, MD, "Gastrointestinal Toxicity of Nonsteroidal Anti-inflammatory Drugs", The New England Journal of Medicine, June 17, 1999, Vol. 340, No. 24, pp. 1888-1889.)
Figure 1. Source of prescription pain relievers for the most recent nonmedical use among past year users aged 12 or older: annual averages, 2013 and 2014

Source: SAMHSA, Center for Behavioral Health Statistics and Quality, National Surveys on Drug Use and Health (NSDUHs), 2013 and 2014.
A Quote From the Report

“\textbf{A sustained coordinated effort is necessary to stem the still-escalating prevalence of opioid-related harms, including a culture change in prescribing for chronic noncancer pain, aggressive regulation of opioids by the FDA, and multi-pronged policies by state and local governments.}”

The Primary Recommendations-1

1. Restrict the number of prescriptions for opioids
   1. “measures at the local level to reduce supply may successfully restrict access”
   2. There is insufficient evidence evaluating the impact of such actions on the well-being of patients with chronic pain

2. Influence prescribing practices
   1. Formulate new evidence-based prescription guidelines and create a national approach to pain education
   2. Leverage data available on prescription drug monitoring programs that allow the tracking of opioid prescribing as a way to inform policies
   3. “Broaden insurance coverage” for nonpharmacologic interventions
The Primary Recommendations-2

1. Reduce Demand
   1. Educate the general public on the risks and benefits of opioids and the effectiveness of opioids vs. nonopioid or nonpharmacologic therapies
   2. Broaden the use of medication-assisted treatments for opioid use at the state level and facilitate their coverage by insurance plans

2. Reduce Harm
   1. Improve access to naloxone through policies by reducing costs and by offering it as an option to patients at risk for developing an OUD along with opioid prescriptions

Chavererff, Clinicalpainadvisor, July 13, 2017; report available at http://nap.edu/24781

And Another Country Heard From: (another report)
National Pain Strategy
A Comprehensive Population Health-Level Strategy for Pain

NIH To the IPRCC (March, 2016)

- Interagency Pain Research Coordinating Committee (IPRCC), a group of representatives from:
  - the Department of Defense
  - Department of Veterans Affairs
  - Agency for Healthcare Research and Quality
  - Centers for Disease Control and Prevention
  - Food and Drug Administration
  - National Institutes of Health
  - Members of the public, including scientists and patient advocates

- Goal: developing a National Pain Strategy that recognizes access to safe and effective care for people suffering from pain as a public health priority. The final Strategy being released today makes recommendations for improving overall pain care in America in six key areas: population research; prevention and care; disparities; service delivery and payment; professional education and training; and public education and communication.
IRPCC Called For:

- Developing methods and metrics to monitor and improve the prevention and management of pain.
- Supporting the development of a system of patient-centered integrated pain management practices based on a biopsychosocial model of care that enables providers and patients to access the full spectrum of pain treatment options.
- Taking steps to reduce barriers to pain care and improve the quality of pain care for vulnerable, stigmatized and underserved populations.
- Increasing public awareness of pain, increasing patient knowledge of treatment options and risks, and helping to develop a better informed health care workforce with regard to pain management.

Better pain care, achieved through implementation of the National Pain Strategy

- Improving provider education on pain management practices and team-based care in which multiple treatment options are offered – moving away from an opioid-centric treatment paradigm.
- Improving patient self-management strategies, as well as patient access to quality, multidisciplinary care that does not depend solely on prescription medications, especially for vulnerable populations.
- Encouraging the evaluation of risks and benefits of current pain treatment regimens.
- Providing patients with educational tools to encourage safer use of prescription opioids.
- Conducting research to identify how best to provide the appropriate pain treatments to individual patients based on their unique medical conditions and preferences.
Good To the Last Sentence:

- The goals of the National Pain Strategy can be achieved through a broad effort in which better pain care is provided, along with safer prescribing practices, such as those recommended in the recently released CDC Guideline for Prescribing Opioids for Chronic Pain.

The Real Opioid Crisis:
Heroin and Fentanyl
CDC: Painkillers No Longer Driving Opioid Epidemic

March 26, 2017

Stop Calling it an Opioid Crisis—It’s a Heroin and Fentanyl Crisis

By JEFFREY A. SINGER
Heroin and Fentanyl Crisis-1

- National Center for Health Statistics (NCHS):
  - 63,600 overdose deaths in 2016
    - 20,000 secondary to fentanyl
    - >15,000 secondary to heroin
    - About 14,500 secondary to prescription opiates
      - But known for years- in MOST cases of prescription opioid deaths, the victims had multiple other potentiating drugs onboard- alcohol, benzodiazepines, barbiturates etc.
    - The rest of the deaths were secondary to methamphetamines, cocaine, benzodiazepines and methadone

Drugs Involved in U.S. Overdose Deaths, 2000 to 2016
Heroin and Fentanyl Crisis-2

- Among more than 64,000 deaths in 2016, sharpest increase occurred among deaths related to fentanyl analogs (synthetic opioids) with over 20,000 OD deaths
- NCHS Noted deaths from fentanyl increased at a steady annual rate of 18%/year from 1999-2013; then up 88% from 2013-2016
- Evidence shows that the fentanyl is being smuggled into the country from factories in China and elsewhere, where it is used to fill counterfeit prescription opioid capsules or to lace heroin
  - Fentanyl in the US is typically prescribed in a transdermal patch

CDC Wonder

Heroin and Fentanyl Crisis-3

- NCHS found death rate steady, from heroin, from 1999-2014, and it has increased by 19%/year since 2014

- After increasing 13%/year from 1999-2009, the death rate increase from prescription opioids has remained steady at 3%/year since 2009
Heroin and Fentanyl Crisis-4

- The DEA has ordered decreases in prescription opioid production:
  - A 25% reduction in 2017 and a 20% further reduction in 2018
  - This appears to follow the false narrative that opioid overdose crisis was secondary to careless doctors and greedy pharmaceutical companies getting patients hooked on prescription opioids and making them into drug addicts
- Since 2010- more if not most states have set up drug monitoring programs that, among other things, allowed physician monitoring and surveillance of doctors and patients
  - This led to a significant reduction in opioid prescribing
  - “high dose” opioid prescribing fell 41% since 2010
  - 2010- brought the second generation of ADF form of oxycontin from Purdue

Heroin and Fentanyl Crisis-5

- This cutback in opioid prescription has been a major cause for patient to endure needless suffering from chronic pain
- Some of these patients, desperate, and no longer functional, turn to the illicit market to get relief- via heroin, heroin laced with fentanyl and fentanyl, all cheaper and easier to find and obtain than doing so legally from a physician
  - Some commit suicide
Heroin and Fentanyl Crisis-6

- In an unfettered plan to decrease opioid use, groups such as the DEA and State Medical Boards focused on physicians treating pain
  - This intrusion on patient-doctor relationship causes physician judgement to become secondary to physician self-help- they don’t want to go to jail for using their best judgement to treat chronic noncancer pain patients
  - Another unintended consequence- by reducing the amount of prescription opioids, and scaring more physicians out of pain management- particularly the GPs, IMs, FPs, etc.- pain patients had no place to legally go
  - There was a reduction of the amount of prescription opioids that could be diverted to the illicit market- deriving nonmedical users (and them too) to heroin and fentanyl- both cheaper and easier to obtain on the street than prescription opioids- and extremely dangerous

Heroin and Fentanyl Crisis-7

- Data from the Centers for Disease Control and Prevention show that from 2006 to 2010 the opioid prescription rate tracked closely with the opioid overdose rate, about 1 overdose per 13,000 prescriptions
- After 2010, when the prescription rate dropped and it became more difficult to divert opioids for nonmedical use, the overdose rate began to climb as nonmedical users switched to heroin and fentanyl
- There is a negative correlation between prescription rate to overdose rate of -0.99 since 2010
- The overdose rate is NOT A PRODUCT OF DOCTORS AND PATIENTS ABUSING PRESCRIPTION OPIOIDS- IT IS A PRODUCT OF NONMEDICAL USERS ACCESSING THE ILLICIT MARKET
At a Congressional briefing on April 6, the President of the American Psychiatric Association, Dr. Maria Oquendo, presented startling data about the opioid overdose epidemic and the role suicide is playing in many of these deaths. I invited her to write a blog on this important topic. More research needs to be done on this hidden aspect of the crisis, including whether there may be a link between pain and suicide. —Nora

Welcome to my blog, here I highlight important work being done at NIDA and other news related to the science of drug abuse and addiction.
Thus Sayeth the Doctor:

 “In 2015, over 33,000 Americans died from opioids—either prescription drugs or heroin or, in many cases, more powerful synthetic opioids like fentanyl. Hidden behind the terrible epidemic of opioid overdose deaths looms the fact that many of these deaths are far from accidental. They are suicides.”- Dr. Maria, Oquendo, President of the American Psychiatric Association

OUD-1

 A study of nearly 5 million veterans (Published in ADDICTION), it was reported that the presence of a diagnosis of any substance use disorder (and specifically diagnoses of opioid use disorders (OUD) led to increased risk of suicide for both males and females-
  • The risk for suicide death was over 2 fold for men with OUD, for women, over 8-fold
  • The suicide rate among those with OUD was 86.9/100,000 (In general US population suicide risk is 14/100,000)
 In another study, (J Psychiatric Research) prescription opioid misuse was associated with anywhere between a 40 and 60% increased risk for suicidal ideation
  – Those with weekly opioid misuse had significantly greater risks for suicide planning and attempts than those that used less often
  – They were about 75% more likely to make plans for suicide and suicide attempts were 200% greater than those unaffected
OUD-2

- In another study, in people with OUD, the standardized mortality ratio was 1,351 and for injection drug use it was 1,237
- This means that compared to the general population, OUD and injection drug use were both associated with a more than 13-fold increased risk for suicide death

Drug and Alcohol Dependence

OUD-3

- Clinically, OUD may/should be considered a brain disorder, but people with this problem are highly stigmatized
  - They state that others typically view them as “not deserving” treatment or “not deserving” rescue of they overdose
  - They are felt to be considered as a “scourge on society”
OUD-4

- Research finds an elevated suicide risk remains in long-term opioid abusers and addicts EVEN WHEN THEY HAVE DISCONTINUED DRUG USE!


Some VA Information

- VA data about opioid discontinuation: overdose and suicide-clinical implications
  - Due to these concerns, the VA conducted an analysis of nation data:
    - In fiscal year 2013, patients prescribed less than 90 MEDD accounted for 95.8% of the sample and 85.7% of overdose/suicide
    - In two sets of fiscal years- 2010-2011 and 2013-2014- opioid discontinuation was not associated with overdose mortality but was associated with increased suicide mortality
    - In all analyses, patients with mental health or substance use disorders (MH/SUD) accounted for most overdose/suicide related deaths

J Substance Abuse
STAT- Boston Globe health publication

- Article by S. Kertesz and Adam Gordon, MD- “some commentators have expressed a desire to die by suicide or have described considering it, in the wake of the crackdown”
- Per Dr. Kertesz, “That suggests we are in some really dangerous territory,”
  (www.statnews.com/?2017/?02/?24/?opioids-prescribing-limits-pain-patients/?)

PAINMEDICINE NEWS
Policy & Management
NOVEMBER 7, 2017
Opioid Crisis Continues to Pressure Physicians, But Patients Bear the Pain
Quotes-1

- “Payors and legislators are limiting physicians’ ability to prescribe...even where rules are absent, the specter of monitoring has many physicians caught between protecting their practices and protecting their patients.” - J Ranieri, DO (addiction medicine and pain specialist, Newell, NJ)
  – He went on to describe a 60 year old chronic arthritis patient who had had a kidney transplant, when her opioid dose was reduced without her consent- an all too common result of the crackdown-she fell apart, as did her adherence to other medications, including ones to protect her kidney- the threat of losing her kidney compounded the uncontrolled pain of her arthritis (Dr. Kertesz, MD, associate professor in the Division of Preventive Medicine, University of Alabama School of Medicine, Birmingham AL)

Quote-1 (cont.)

- The CDC had been “extremely careful” not to directly mandate dose reductions in patients “evaluated as benefiting from opioid prescriptions” said Dr. Kertesz
- But the CDC Guideline suggests a 90 MME ceiling and states that for treatment of acute pain, 3 days or less often suffices, and that more than 7 days is rarely necessary
- HOWEVER- Legislators are enshrining these provisions as law, and many insurers are using them to determine coverage- Something even the enablers of the CDC Guidelines may or may not have expected- and Insurers are also taking advantage of it

Pain Medicine News, Nov. 7, 2017
Oops!

- By ratcheting down opioid prescriptions, there appears to be an increase in the problems it was meant to reduce-
  - From 2010-2015, overdose deaths involving natural and semisynthetic opioids fell from 29% to 24% of all overdose deaths
  - But these were swamped by the rise of overdose deaths from heroin and synthetic opioids, excluding methadone, which tripled to 25% and doubled to 18% of the total, which has continued to rise

- Pain Medicine News, Nov 7, 2017

Quotes-2

- “For Physicians wishing to stay out of the firing line, the implicitly encouraged step is involuntary dose reduction, even if the patient is functionally stable on their current dose…That course of action has absolutely no trial data to support it”- Dr. S. Kertesz

- Secondary to growing medical-legal liabilities, “more and more primary care practices are saying they won’t offer opioid for any reason…. The restrictions have driven up the amount of time you need to spend and with all these laws and regulations, there hasn’t been a concurrent increase in reimbursement”- Ed Michna, MD (Director of the Pain Trials Center, Brigham and Women’s Hospital in Boston)
Quotes-2 (cont.)

- A number of states have enacted legislation that gives so-called “soft-limits” on dosages which may lack the force of law but can be used to evaluate a physician's practice- some states have hard limits.
- Even with “soft limits” “doctors feel it increases liability and even if the prescriber has documentation, they are being scrutinized… they can be called on by state regulatory agencies to explain any patients with morphine equivalent daily dosages (MEDD) that fall (beyond) a predetermined limit… the clinician may reduce the dosage to meet the state MEDD limit because they don’t want to deal with it.”- Jeff Fudin, PharmD, Founder and Chair of Professionals for Rational Opioid Monitoring and Pharmacotherapy

Quotes-3

- “Insurance companies are incorporating guidelines into what they’re willing to pay for under any circumstance, thus driving a lot of clinical decision making on what are supposed to be guidelines applying only to primary care doctors” (i.e. the CDC Guidelines)- Ed Michna, MD
- “it has been my experience that …some commercial plans have already been imposing (dosage ceilings) when it is not currently required… anything above 90 mg of MEDD becomes problematic” James DeMicco, PharmD, J&J State Street Pharmacy in Hackensack NJ)
Quotes-4

- Some insurance companies will not pay for extended release or “have created incredibly lengthy red tape” that must be navigated before payment in response to the CDC Guideline’s 4th recommendation to avoid extended-release opioid when starting therapy- Sanford Silverman, MD, Director-at-large of the American Society of Interventional Pain Physicians.

- Per Dr. Silverman, “These strictures apply even when these opioid are prescribed by pain specialists, although the CDC guideline only applies to primary care physicians... Some insurance companies don’t even cover extended release, long acting (opioids) in the formulary...”Dr. Silverman had to spend 20 minutes convincing a pharmacy staff member that it was legal to give an opioid naive patient a short-acting opioid"
These companies are attempting to capitalize on concern about the opioid crisis to obtain increased federal payments for crush-resistant pills and inclusion of these products on state Medicaid formularies.

Unfortunately, crush-resistant pills do not help prevent opioid addiction because they are just as addictive as the easy-to-crush formulations.

Patients taking opioids exactly as prescribed can still become addicted and recreational users who become addicted most often develop the disease by taking pills orally. Once addicted, some will transition to snorting or injecting, but most stick with swallowing pills.

If Prescribers make the mistake of believing that these products are less addictive they may continue to overprescribe which would worsen the epidemic.
What’s missing here (Aside from the Obvious)

- No statement of opioid abuse or misuse—just everyone will get addicted (everyone will develop an OUD?)
- The fact that it is a Heroin and Fentanyl Crisis, as most now understand - that prescription medications are the least of the problems!

In Summary

- What it appears that “they” are saying:
- So therefore we must give minimal dosages of opioids to patients who need more, and there must be fewer medications available (Thank the DEA) and fewer physicians who prescribe any opioid- I think that is what he is saying- that, and the unintended consequence of pushing chronic pain patients to have to obtain illicit medications to remain functional (especially when they can’t find a physician to prescribe pain meds) when the PROP written CDC guidelines force marked opioid reduction or discontinuation, and if the Heroin they buy is laced with fentanyl and they die? Well, they shouldn’t have been drug addicts anyway!
Again: The Insurance Cartel, uh, Companies

- The Naughty 1990s

A Multidimensional Problem- and a Solution?

- While more groups are currently looking to create “better molecules”, enhancing the unidimensional treatment approach…
- The 1980s and early 1990s- with some pleasant exceptions
- A study performed in 1995 found that only 6% of all patients treated by “pain specialists” (6%=176,850 patients) were treated at an interdisciplinary pain center. These patients were sent to these facilities almost as a “last resort,” as they had already had a mean 7-year history of pain and pain treatments, with $13,284/patient/year being spent on nonsurgical pain-related health care costs. These patients also had an average of 1.7 surgeries performed at an average cost (1994–1995 dollars) of $15,000/surgery.
- The cost of health care for these patients (only 6% of the pain patients seen in that year) was greater than $20 billion.

Marketdata Enterprises, 1995
A Multidimensional Problem- and a Solution?-2

- The cost of treatment at the interdisciplinary centers was greater than $1.4 billion (1995 average cost of $8100 × 176,850). The medical cost savings after one year (posttreatment at the interdisciplinary centers) was greater than $1.87 billion, an 86% reduction in health care costs.
- The fact that the interdisciplinary pain centers are clinically effective, cost effective and provide clinical relief that lasts during the first year post treatment has been well documented.
- In one systematic review, it was concluded that patients could be returned to work with nonsurgical, interdisciplinary pain center treatment (37 controlled and noncontrolled studies were evaluated). In another systematic review, 65 controlled and noncontrolled studies were evaluated. The review supported the effectiveness of interdisciplinary treatment but noted methodological problems existed in some of these studies.


A Multidimensional Problem- and a Solution?-3

- Another study found that treatment at an interdisciplinary center was more clinically effective and more cost effective than the traditional treatment methods, including medication; surgery; interventional procedures (nerve blocks); noninvasive treatment modalities such as physical therapy (alone); and implantable devices such as spinal cord stimulators and medication pumps. It was also found that the cost to return one injured worker after treatment at an interdisciplinary pain center was $11,913, while the cost to return one patient to work after back surgery was $75,000. The cost to return patients to work indicates that treatment at an interdisciplinary pain center is 6.3 times more cost effective than surgery.
- When utilizing commonly accepted criteria, a systematic review (from the Cochrane Database) entitled “Multidisciplinary Bio-psychosocial rehabilitation for chronic low back pain” concluded that evidence showed intensive (>100 hours of therapy) interdisciplinary bio-psycho-social pain rehabilitation programs with a functional restoration approach engendered greater improvements in pain and function for patients with “disabling chronic low back pain,” then did nonmultidisciplinary rehabilitation or “usual care.”

Marketdata Enterprises, 1995; Guzman et al, 2002
A Multidimensional Problem- and a Solution?-4

- Turk and Burwinkle note an “epidemic of ‘Mural Dyslexia’,” the “inability to read the handwriting on the wall.”
- There is a large cohort of published information indicating that the interdisciplinary pain centers are clinically effective, cost effective and via their treatment paradigm, able to provide significant savings in health care and disability payments.

Turk D, Burwinkle, 2004; Robbins et al, 2003

A Multidimensional Problem- and a Solution?-5

- Robbins et al. noted that patients in their interdisciplinary pain management programs who were forced by insurance company “carve outs” to have physical therapy elsewhere experienced negative treatment outcomes at one year, in comparison to those patients who were able to participate in the full, intact program.

Robbins et al, 2003
A Multidimensional Problem- and a Solution?-6

- The restoration of function must be a primary goal of all interdisciplinary treatment programs. Rehabilitation, while it focuses on function and not specifically pain, is associated with decreased pain and improvements in psychological status as function improves, with fewer and less opioid usage.
- Finally, dual diagnosis multidisciplinary pain programs which deal with chronic noncancer pain and substance abusing patients are also found to work well.

Schofferman et al, 2006; Mahoney et al, 1999

A Multidimensional Problem- and a Solution?-7

- It must, unfortunately, go without saying: as the Insurance Companies refused to fund interdisciplinary care, with few exceptions; there is a paucity of recent data, and a paucity of outstanding patient outcomes from interdisciplinary programs. There is a huge paucity of interdisciplinary pain programs.
- One way to “fix” the “opioid crisis” is to enable EBM proven interdisciplinary proven care.
- It has even been shown to be cost effective, and use fewer/less opioids- which should matter.

Jay, 2010
In Summary

- What it appears that “they” are saying:
- So therefore we must give minimal dosages of opioids to patients who need more, and there must be fewer medications available (Thank the DEA) and fewer physicians who prescribe any opioid; that, and the unintended consequence of pushing chronic pain patients to have to obtain illicit medications to remain functional (especially when they can’t find a physician to prescribe pain meds at all, even after their dosage has been forcibly cut); when the PROP written CDC guidelines force marked opioid reduction (secondary to “legalization” of recommendations) or discontinuation, and if the Heroin they buy is laced with fentanyl and they die? Well, they shouldn’t have been drug addicts anyway!
- Or are they purposely “Thinning the herd?”