

April 12, 2024

Christine M. Khandelwal, DO
Chair
Reference Committee A
Federation of State Medical Boards
400 Fuller Wisser Road
Eules, TX 76039

Re: American Medical Association strong support for the FSMB Strategies for Prescribing Opioids for the Management of Pain

Dear Dr. Khandelwal:

On behalf of the physician and medical student members of the American Medical Association (AMA), I write in strong support of the “Strategies for Prescribing Opioids for the Management of Pain,” (Strategies) which are under consideration by the Federation of State Medical Boards (FSMB) House of Delegates at its April 2024 Annual Meeting. The AMA was pleased to be a member of the multidisciplinary workgroup that helped inform the Strategies. We look forward to continuing to work with the FSMB and its member boards to help states implement and promote the Strategies. The updates to the Strategies will help provide member boards clear guidance to improve pain care because they:

- Provide clear guidance to boards and physicians about the need for individualized patient care decisions when evaluating, treating, and managing care for patients with pain.
- Highlight the importance of patient-physician shared decision-making when considering whether to initiate opioid therapy, taper therapy, or take measures to discontinue therapy.
- Emphasize that evaluating the “success” of a treatment plan is multifaceted and could range from functional improvement to improvement in quality of life, as well as reductions in a patient’s decline.
- Recognize that opioid therapy is only one possible facet of comprehensive pain management, but one that can play an important role in care.

From the introduction and throughout the Strategies, the FSMB carefully articulates the incredibly complicated landscape facing physicians and patients with pain. As the nation continues to face a deadly drug-related overdose and death epidemic fueled by illicitly manufactured fentanyl, patients with pain continue to face one-size-fits-all state laws, as well as pharmacy chain, payer, and pharmacy benefit management company policies, that mistakenly hold on to the false belief that restrictions in opioid prescribing will result in improved pain care and reduced mortality. The nation’s physicians have reduced opioid prescribing by more than

Christine M. Khandelwal, DO

April 12, 2024

Page 2

49 percent nationwide since 2012, but drug-related mortality has increased without any indication that patients' pain outcomes have improved.

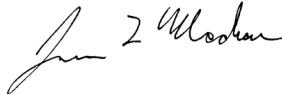
The Strategies accurately reflect that a course correction is necessary to balance the need for continued, appropriate oversight and patients' access to evidence-based pain care. The AMA agrees with the Strategies' observation that it is of "paramount importance of individualized, patient-centered, equitable care in the management of pain, regardless of the patient's age, race, ethnicity, gender, disability, or socioeconomic status." This is not just a theme in the Strategies, but a clear call to the nation's medical boards that patients with pain deserve greater care and compassion than recent history has afforded them.

For these reasons, the AMA **strongly supports** the Strategies and urges the FSMB House of Delegates to support their adoption.

If you have any questions, please contact Daniel Blaney-Koen, JD, Senior Attorney, Advocacy Resource Center, at daniel.blaney-koen@ama-assn.org.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim L. Madara".

James L. Madara, MD