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April 11, 2022
Rochelle Walensky, MD
Director
Centers for Disease Control and Prevention (CDC)
1600 Clifton Road
Atlanta, GA 30329

Dear Dr. Walensky,

On behalf of its 40,000 members, the Academy of General Dentistry (AGD) appreciates the opportunity to provide comments on the CDC's draft Clinical Practice Guideline for Prescribing Opioids. As you would expect, a segment of our members prescribe opioids to alleviate their patients' pain after dental surgical procedures.

We recognize that the clinical practice guideline "updates and expands the CDC Guideline for Prescribing Opioids for Chronic Pain — United States, 2016 (Dowell, Haegerich, & Chou, 2016) and provides evidence-based recommendations for clinicians providing pain care, including those prescribing opioids, for outpatients aged ≥ 18 years with acute pain (duration less than a month), subacute (duration 1-3 months) pain, or chronic pain (duration of greater than 3 months) pain."¹ Our responses to the most concerning elements of the updated content are detailed below.

Formulating Regulations

The CDC is not a federal regulatory agency and does not dictate the practice of medicine or dentistry; state medical and dental boards provide that function. The draft 2022 CDC opioid prescribing guideline repeats language that the recommendations should not be used to formulate regulations. Despite caveats such as this, in practicality, most states are following the CDC's 2016 guidelines and it's reasonable to presume that they will follow any updated guidance. AGD understands that chronic users of opioids, long-term users, and their advocates were bereft following the 2016 guidelines and did not believe that there were sufficient alternatives for pain control. For these reasons, the AGD supports updating the 2016 guidelines.

Though not the intent of the 2016 CDC Guideline, design and implementation of new laws, regulations, and policies also drew from its recommendations. "More than half of all states have passed legislation that limits initial opioid prescriptions for acute pain to a seven-day supply or less (National Conference of State Legislatures, June 30, 2019.), and many insurers,

¹ CDC Clinical Practice Guidelines for Prescribing Opioids 2022 [Regulations.gov](https://www.cdc.gov/regulations)

pharmacy benefit managers, and pharmacies also have enacted similar policies (U.S. Department of Health and Human Services, 2020). (From CDC guidelines)”²

Undoing state regulations and laws is a time consuming, laborious, and onerous process that is not likely to happen in most states. Issuing updated guidelines that are unnecessary only complicates the healthcare regulatory environment and causes confusion for doctors and patients alike. In the state of Washington, dental regulations strongly advise against the use of opioids so as to be outside of the standard of care.

Need for Updates

AGD appreciates the effort and expertise needed to develop clinical practice guidelines. They are labor intensive projects that generally require years’ worth of effort to research the evidence, weigh it on a hierarchical evidentiary scale, and draft guidelines based on the outcomes of the research. This clinical practice guideline was researched by librarians in 2018-2020. As such, we find that there are updates that should be addressed before the CDC issues the final draft. Additionally, within the methodology, AGD notes that some associations were chosen to review a preliminary draft. It is our position that the CDC failed to consider the full community of stakeholders by neglecting to consult with practitioners in a particular endeavor of dentistry or medicine as a way to ensure that the updated document would reflect the realities of the actual practical usage of opioids and alternative methods of pain control.

AGD suggests the following material updates to the document:

- On June 7, 2021, Missouri Governor Mike Parson signed SB 63 into law establishing a statewide prescription drug monitoring program (PDMP). As Missouri was previously the lone state without a PDMP, Missouri joins all other 49 states in this endeavor.
- Dentists are increasingly using Ibuprofen-Acetaminophen combinations for dental pain, which are marketed as over-the-counter drugs. As such, many dentists rarely prescribe opioids any longer.
- There are several other alternative pain remedies for orthopaedic pain such as hyaluronic acid injections for knee osteoarthritis that have been administered for over 20 years in addition to Cox-2 inhibitors.

² Ibid. Page 11

Lack of Transparency

The draft guideline was not available on the CDC website and no URL was provided within the *Federal Register* notice. By posting the 2022 guidelines solely in the Regulations.gov docket, the CDC has made it unnecessarily difficult for interested parties and commenters to locate and review the new report. This is a grave disservice to the American public, the community the CDC the agency has pledged to support by “Saving Lives, Protecting People.” Documents such as this should be easily accessible to all potential viewers, especially those unfamiliar with government regulatory dockets.

Conclusion

The AGD thanks the CDC for soliciting input into the Clinical Practice Guideline for Prescribing Opioids. Please contact Daniel J. Buksa, JD, Associate Executive Director, Public Affairs, by phone at (312) 440-4328 or via email at daniel.buksa@agd.org if you have questions or would like to discuss our comments in greater detail.

Sincerely,



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MAGD AGD President



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