



Physicians for Responsible Opioid Prescribing

164 West 74th Street
New York, NY 10023

www.supportprop.org

T 347 396 0371

F 347 396 0370

April 13, 2016

Mark Chassin, MD, MPH
President and CEO
The Joint Commission
One Renaissance Blvd,
Oakbrook Terrace, IL 60181

Dear Dr. Chassin:

The undersigned organizations and individuals are writing to request that the Joint Commission reexamine the Pain Management Standards (PC.01.02.07, PC.01.02.01 RI.01.01.01). Although we commend TJC for its recent clarification of PC.01.02.07, affirming that treatment strategies may include non-pharmacological approaches, we believe the Pain Management Standards continue to encourage unnecessary, unhelpful and unsafe pain treatments that interfere with primary disease management.

Pain is a symptom, not a vital sign. Blood pressure, heart rate, respiratory rate and temperature are vital signs that can be objectively measured. Pain is only one of many distressing symptoms that patients can experience and to which health care professionals must be attentive. Pain is also not a single entity that warrants a formulaic “titrate to effect” approach in response to a patient’s reported pain score. Mandating routine pain assessments for all patients in all settings is unwarranted and can lead to overtreatment and overuse of opioid analgesics. Health care professionals are capable of using their clinical judgment to determine when to assess patients for pain.

The United States experienced a sharp rise in prescriptions for opioid analgesics following the introduction of the Pain Management Standards. A recent study found that physicians prescribed opioids, often in high doses, in more than half of 1.14 million nonsurgical hospital admissions.¹ According to the Centers for Disease Control and Prevention, sharp increases in opioid prescribing have led to parallel increases in opioid addiction and overdose deaths. Since the Pain Management Standards were introduced 15 years ago, more than 200,000 Americans have died from accidental overdoses involving prescription opioids.

The Pain Management Standards foster dangerous pain control practices, the endpoint of which is often the inappropriate provision of opioids with disastrous adverse consequences for individuals, families and communities. To help stem the opioid addiction epidemic, we request that TJC reexamine these Standards immediately.

Your kind consideration of this request is appreciated. If you have any questions, please contact the office of Dr. Andrew Kolodny at (347) 396-0371.

¹ Herzig SJ, Rothberg MB, Cheung M, Ngo LH, Marcantonio ER. 2014. Opioid utilization and opioid related adverse events in nonsurgical patients in US hospitals. *J. Hosp. Med.* 9:73–81.

Respectfully submitted,

Harry Chen, MD
Commissioner
Vermont Department of Health
Burlington, VT

R. Jeffrey Goldsmith, MD
President
American Society of Addiction Medicine
Chevy Chase, MD

Karen M. Murphy, PhD RN
Secretary of Health
Pennsylvania Department of Health
Pottsville, PA

Cynthia A. Pearson
Executive Director, National Women's
Health Network
Co-founder, Raising Women's Voices
for the Health Care We Need
Washington, DC

G. Caleb Alexander, MD, MS
Co-Director, Center for Drug Safety
and Effectiveness
Johns Hopkins Bloomberg School of
Public Health
Baltimore, MD

Chris Johnson, MD
American College of Emergency
Physicians, Board of Trustees,
Minnesota Medical Association. Chair,
Minnesota Dept. of Human Services
Opioid Prescribing Work Group

Jane Ballantyne, MD
President
Physicians for Responsible Opioid
Prescribing (PROP)
New York, NY

Jay C. Butler, MD, CPE
Chief Medical Officer,
Alaska Department of Health and
Social Services
Anchorage, AK

Elinore F. McCance-Katz, M.D., PhD
Chief Medical Officer
Rhode Island Department of
Behavioral Health, Developmental
Disabilities, and Hospitals

Andrew Kolodny, MD
Executive Director
Physicians for Responsible Opioid
Prescribing (PROP)
New York, NY

Maria Montanaro, MSW
Director,
Rhode Island State Department of
Behavioral Healthcare,
Developmental Disabilities & Hospitals

Esther L. Muña
Chief Executive Officer
Commonwealth Healthcare
Corporation
Northern Mariana Islands

Susan K. Blank, MD
President,
Georgia Society of Addiction
Medicine

Jean Silver-Isenstadt, MD, PhD
Executive Director
National Physicians Alliance
Washington, DC

Leslie Dye, MD
President,
American College of Medical Toxicology
Phoenix, AZ

Marvin D. Seppala, MD
Chief Medical Officer
Hazelden Betty Ford Foundation
Center City, MN

Anna Lembke, MD
Chief of Addiction Medicine
Stanford University School of Medicine
Stanford, CA

Kathryn L. Cates-Wessel
Executive Director
American Academy of Addiction
Psychiatry
East Providence, RI

Carl Christensen, MD, PhD
Medical Director, Michigan Health
Professionals Recovery Program
Clinical Associate Professor,
Psychiatry & OB Gyn
Wayne State School of Medicine

David Juurlink, MD, PhD
Professor & Head, Div. of Clinical
Pharmacology & Toxicology
Senior Scientist, Institute for Clinical
Evaluative Sciences,
University of Toronto

Samuel A. Ball, PhD
President and CEO
National Center on Addiction and
Substance Abuse
New York, NY

Michael A. Carome, MD
Director, Health Research Group
Public Citizen
Washington, DC

Frederic M. Baurer, MD
President
Pennsylvania Society of Addiction
Medicine

Merlin Kilbury, MD
Associate Director
Oklahoma Physicians Health Program
Tulsa, OK

Michael Von Korff, ScD
Senior Investigator,
Group Health Research Institute
Seattle, WA

Adriane Fugh-Berman, MD
Director, PharmedOut
Georgetown University Medical Center
Washington, DC

Jon Streltzer, MD
Professor Emeritus of Psychiatry,
University of Hawaii School of Medicine
Honolulu, HI

Roy M. Poses, MD
President
Foundation for Integrity and
Responsibility in Medicine
Warren, RI

P. Bradley Hall, MD
Executive Medical Director
West Virginia Medical Professionals
Health Program
Mount Clare, WV

Mark Sullivan, MD, PhD
Professor, Psychiatry and Behavioral
Sciences Adjunct Professor,
Anesthesiology and Pain Medicine,
Bioethics and Humanities
University of Washington, WA

Christina M. Delos Reyes, MD
Associate Professor
Department of Psychiatry
Cleveland, Ohio

Lewis Nelson, MD
Professor, Emergency Medicine
NYU School of Medicine
New York, NY

Lloyd J Gordon, MD
Medical Director
Southeast Behavioral Health/COPAC
Brandon, MS

Sherrie Rubin
Director
The Hope2gether Foundation
San Diego, CA

Gary Mendell
Founder, CEO
Shatterproof
New York, NY

Judson (Kim) Bemis
Chair
Steve Rummier Hope Foundation
Minneapolis, MN

Janet Colbert
CEO, STOPPNOW
Broward County, FL

Raymond V. Tamasi
President/CEO
Gosnold on Cape Cod

Terry L. Alley, MD
Medical Review Officer
Franklin, TN

Rosemary Orr, MD
Professor of Anesthesiology and
Pain Medicine,
University of Washington and
Seattle Children's Hospital,
Seattle, WA

Kirk Moberg, MD, PhD
Medical Director, Illinois Institute for
Addiction Recovery
Clinical Professor, Internal Medicine &
Psychiatry
University of Illinois College of Medicine

Darrin Mangiacarne, DO, MPH
Fairbanks, Medical Director
Diplomat, American Board of Addiction
Medicine & American Osteopathic
Board of Family Physicians
Indianapolis, IN

Robert Watson, MD
Professor of Neurology, FSU COM
Tallahassee, FL
Professor Emeritus, UF COM
Gainesville, FL

Douglas J Davies, MD
Medical Director, The Refuge
Assistant Professor,
Florida State University College of
Medicine

Judy Rummier
Chair
FED UP! Coalition to End the Opioid
Epidemic
Minneapolis, MN

Ken Thompson, MD
Trusted Servant
Like Minded Docs
Strasburg, PA

Michael Price, MD
Medical Director,
Bestcare Treatment Services
Redmond, OR

Mel Pohl, MD
Medical Director
Las Vegas Recovery Center
Las Vegas, NV

Terry R. Rogers, MD
Medical Director,
Lakeside Milam Recovery Centers
Kirkland, WA

Danesh Mazloomdoost, MD
Medical Director
Pain Management Medicine
Lexington, KY

James A. Harrow, MD, PhD
Medical Director
Alabama Physician Health Program
Montgomery, AL

Michael Denicole, MD
Medical Director, The Meadows
Wickenburg, AZ

Stephen G. Gelfand, MD
Rheumatology/Internal Medicine
Myrtle Beach, SC

Betts Tully
Patient advocate
Chicago, Illinois

Daniel Headrick, MD
CEO
Tres Vistas Recovery
San Clemente, CA

Randall Sherman, MD
Advisor, Mississippi Physicians
Health Program
Hattiesburg, MS

Traci Westerfield, MD
Pain Treatment Center of the
Bluegrass
Lexington, KY

Anne Constantino
President and CEO
Horizon Health Services
Buffalo, NY

William Samuel Grass, MD
Adult Psychiatry and Addiction
Medicine
Burlington, VT

Avi Israel
President
Save the Michaels of the World
Buffalo, NY

Teri Kroll
People United to Stop Heroin on Long
Island, Families in Support of Treatment
Copiague Community Cares
Edgewood, NY