



August 14, 2019
The Honorable Seema Verma
Administrator, Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

RE: U.S. Pain Foundation Supports Proposed Decision Demo for Acupuncture for Chronic Low Back Pain (CAG-00452N)

Administrator Verma,

The U.S. Pain Foundation is a 501(3)(c) nonprofit organization that seeks to empower, educate, support, and advocate for the 50 million Americans who live with chronic pain. We support the Centers for Medicare & Medicaid Services' (CMS) proposal to provide coverage for acupuncture for chronic low back pain (CLBP) to certain Medicare enrollees. U.S. Pain encourages public and private payer coverage of acupuncture to treat CLBP, and urges CMS to consider offering coverage to beneficiaries living with all diseases and conditions which cause chronic pain.

U.S. Pain believes in a balanced approach toward combating the twin crises of opioid abuse and misuse and chronic pain. The goals of an appropriate pain management plan should be to decrease pain and suffering, improve physical and mental functioning, and ensure improved quality of life. Increasing access and coverage of various modalities, including acupuncture, may, in addition, decrease overall medical expenses and costs to both enrollees and Medicare health plan programs. Our organization further supports an integrative and individualized approach to chronic pain management as recommended by the U.S. Department of Health and Human Services' Pain Management Best Practices Interagency Task Force convened as part of the Comprehensive Addiction and Recovery Act (CARA).

Today, integrative approaches are being used for pain management for military personnel and veterans, symptom management in cancer patients and survivors as well as in the area of health-related behaviors. For example, the U.S. Department of Veterans Affairs (VA) medical centers and hospitals were mandated to have access to acupuncture, in addition to other complementary and integrative therapies by October of 2018. This mandate stems from results of evidence-based review by the Integrative Health Coordinating Center (IHCC) within the VA's office of Patient Centered Care and Cultural Transformation.

Outside of the VA utilizing integrative pain management therapies for vulnerable patient populations, the American College of Physicians' (ACP) low back pain treatment guideline cites heat therapy, massage, acupuncture and spinal manipulation as noninvasive, non-drug options for low back pain treatment. The National Academy of Sciences, Engineering, and Medicine's *Pain Management and the Opioid Epidemic: Balancing Societal and Individual Benefits and Risks of Prescription Opioid Use* Consensus Study Report published in 2017 noted that "nonpharmacologic



interventions for pain treatment, including acupuncture, physical therapy and exercise, cognitive behavioral therapy and mindfulness meditation, also are powerful tools in the management of chronic pain”.

With integrative and complementary therapy options receiving such wide recognition as a beneficial option for many Americans diagnosed with varied chronic pain conditions, U.S. Pain Foundation encourages CMS to endorse acupuncture as a valid treatment option for chronic low back pain. We recognize that low back pain is one of the most common causes of chronic pain, with millions of Americans experiencing low back pain at any given time, which is why the organization believes it is important for payers to cover acupuncture and other therapies not currently covered to help maintain overall daily function.

U.S. Pain Foundation encourages CMS to also consider the unique needs of individuals with various chronic pain conditions enrolled within Medicare. We know that there is no “one-size-fits-all” solution to manage chronic pain. That being said, providing opportunities for the millions of Americans riddled with pain to have access to alternative management options, such as acupuncture, may reduce pain levels and enhance a person’s overall quality of life. Opening access to acupuncture and other integrative pain treatments may also decrease the financial burdens many families and individuals experience due to missed work and high cost of health care premiums.

On behalf of those Medicare enrollees living with chronic low back pain and other, equally challenging pain conditions, U.S. Pain Foundation respectfully requests that CMS move forward with its proposed decision to provide coverage of acupuncture to chronic low back pain enrollees who meet the proposal’s criteria, but also open up coverage of acupuncture to all beneficiaries living with chronic pain conditions.

Respectfully submitted,
Nicole Hemmenway
Interim CEO, U.S. Pain Foundation