

April 11, 2022

Rochelle Walensky, MD  
Director, Centers for Disease Control and Prevention  
Attn: National Center for Injury Prevention and Control  
4770 Buford Highway NE, MS S106-9  
Atlanta, GA 30341

Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

**Re: Proposed 2022 CDC Clinical Practice Guideline for Prescribing Opioids [Docket No. CDC–2022–0024]**

Director Walensky:

The Premier healthcare alliance appreciates the opportunity to submit comments to the Centers for Disease Control and Prevention (CDC) on the request for comments titled “*Proposed 2022 CDC Clinical Practice Guideline for Prescribing Opioids [Docket No. CDC–2022–0024]*” which was published in the February 10, 2022 *Federal Register*. CDC is soliciting public comment on revisions to clinical practice guidelines and evidence-based recommendations for clinicians who provide pain care that were originally published in 2016.

Premier is a leading healthcare improvement company, uniting an alliance of more than 4,400 U.S. hospitals and health systems and 225,000 non-acute providers to transform healthcare. With integrated data and analytics, collaboratives, supply chain solutions, consulting and other services, Premier enables better care and outcomes at a lower cost. A 2006 Malcolm Baldrige National Quality Award recipient, Premier plays a critical role in the rapidly evolving healthcare industry, collaborating with providers to co-develop long-term innovations that reinvent and improve the way care is delivered to patients nationwide. A key component of our alliance is our Integrated Pharmacy Program, which combines essential clinical data with purchasing power to deliver reduced costs, improved quality, safety and resiliency, and increase knowledge-sharing among healthcare professionals.

While the CDC’s original 2016 guidance was well-intended, several unintended consequences unfortunately emerged with the guidance interpreted and applied as unduly rigid by insurers, pharmacists, providers, patients, and others. This rigid application, and sometimes misapplication, led to further stigmatization of appropriate pain management — and sometimes prevented patients from receiving proper care with guidelines impacting the doctor-patient relationship.

***Premier shares the CDC’s commitment to curbing the opioid epidemic and decreasing unnecessary exposure to prescription opioids.*** In the 2022 revision, CDC corrects many of these missteps and articulates that these recommendations should not be used to interfere with clinician judgement in certain personal and/or difficult situations. In addition, the carving out of patients with sickle cell pain, cancer pain, and at the end-of-life is a positive step toward making the guidelines more limited in scope and recognizing that a “one-size-fits-all” approach to pain management is not feasible. Premier also appreciates the revised guidelines that consider pain management during pregnancy for individuals with opioid use disorder and

the associated improvements in maternal and infant outcomes. ***Therefore, as the CDC works toward finalizing the 2022 guidelines, Premier urges the CDC to continue down the path of transparency, flexibility, and inclusion to create a holistic, comprehensive, and multi-faceted approach to address the opioid epidemic that balances preventing the diversion and abuse of opioids with ensuring clinically appropriate care.***

In closing, the Premier healthcare alliance appreciates the opportunity to submit these comments on CDC–2022–0024. Premier looks forward to working with the CDC and other stakeholders to address the opioid crisis while ensuring opioids remain available as a treatment option for clinically appropriate care.

If you have any questions regarding our comments or need more information, please contact Soumi Saha, Vice President of Advocacy, at [soumi\\_saha@premierinc.com](mailto:soumi_saha@premierinc.com) or 732-266-5472.

Sincerely,

A handwritten signature in black ink, appearing to read "Blair Childs". The signature is fluid and cursive, with a large initial "B" and "C".

Blair Childs  
Senior Vice President of Public Affairs  
Premier Inc.