



AMERICAN ACADEMY OF  
ORTHOPAEDIC SURGEONS

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July 5, 2017

Scott Gottlieb, MD  
Commissioner  
Food and Drug Administration (FDA)  
10903 New Hampshire Ave.  
Silver Spring, MD 20993

RE: FDA-2017-N-1094

Dear Dr. Gottlieb,

On behalf of more than 18,000 board-certified orthopaedic surgeons, the American Academy of Orthopaedic Surgeons (AAOS) thanks the FDA for the opportunity to comment on the “Training Health Care Providers on Pain Management and Safe Use of Opioid Analgesics – Exploring the Path Forward.”

The AAOS understands the United States is in the midst of an epidemic of opioid drug use, misuse, and abuse. It is of the utmost importance to the AAOS that new strategies be implemented to curb the number of inappropriate, non-therapeutic opioid prescriptions and the public’s overall opioid consumption. The AAOS is supportive of comprehensive education and training efforts for health providers regarding pain management and the safe prescribing, dispensing and patient use of opioids. With that, the Academy offers the following comments.

**What does the role of health provider education play in reducing the opioid epidemic?**

Appropriate prescribing and pain management education for providers will enhance physician and caregiver awareness of the risks and appropriateness of opioid medications and will aid in the reduction of opioid use and misuse. The AAOS believes physicians’ enhanced understanding of opioid analgesics and alternative, multimodal pain management techniques would lead to better patient outcomes, and an opportunity for patient education and increased shared decision-making.

**How best to provide that training?**

AAOS believes that medical professional organizations are best situated to provide relevant and meaningful education to its members and patients, helping avoid a situation of adding another requirement that may do little to enhance patient care. Recognizing the urgency of this public health problem and the important roles that physicians have in controlling appropriate use of opioid medications, the AAOS believes that requiring Continuing Medical Education (CME) on opioid safety and optimal pain management strategies will help physicians reduce inappropriate opioid use and misuse, while still providing high quality musculoskeletal care.

To mitigate the significant time, resources and commitment of regulatory, legislative, health policy and medical professional organizations, partnerships could be established to ensure that provider education and training is optimized and met at the federal and state levels.



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### Issues and challenges to federal efforts to educate providers.

As was noted during the public meeting, it is important to be mindful of the fact that provider requirements vary considerably from state to state. Developing and implementing provider education can be challenging when trying to adhere and meet the varied requirements of each individual state. But, it is also equally important to recognize that different medical specialties require education tailored to meet the needs of their respective patients and a one-size-fits-all approach poses its own significant challenges. For health provider education to be effective in reducing the opioid epidemic, an approach will need to be developed that balances a national education standard with specific needs of different medical specialties.

### Conclusion

AAOS recommends that the responsibility for developing and implementing comprehensive education and training for providers be reserved to professional medical organizations, which are best positioned to understand the needs of its members and respective patients.

Thank you for your time and consideration of the AAOS's comments on "Training Health Care Providers on Pain Management and Safe Use of Opioid Analgesics – Exploring the Path Forward." AAOS looks forward to working closely on educational efforts related to pain management and the safe prescribing, dispensing and patient use of opioids. Together we can end the national opioid abuse epidemic.

Should you have questions on any of the above responses or concerns, please do not hesitate to contact AAOS's Medical Director, William O. Shaffer, MD, at 202-548-4430 or via email at [shaffer@aaos.org](mailto:shaffer@aaos.org).

Sincerely,

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President, American Academy of Orthopaedic Surgeons

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