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Marie B. Grause, RN, JD • President

Headquarters
One Empire Drive, Rensselaer, NY 12144
518.431.7600

Washington, DC Office
499 South Capitol Street SW, Suite 410
Washington, D.C. 20003
202.488.1272

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April 11, 2022

Christopher Jones, PharmD, DrPh, MPH (CAPT, USPHS)
Acting Director
National Center for Injury Prevention and Control
Centers for Disease Control and Prevention
4770 Buford Highway NE
Atlanta, GA 30341

Submitted electronically: www.regulations.gov

RE: CDC-2022-0024, Proposed 2022 CDC Clinical Practice Guidelines for Prescribing Opioids

Dear Dr. Jones:

The Healthcare Association of New York State, on behalf of our member nonprofit and public hospitals, nursing homes, home health agencies and other healthcare providers, welcomes the opportunity to comment on the CDC's 2022 *CDC Clinical Practice Guidelines for Prescribing Opioids*.

Opioid overdose complications and deaths have reached record highs in recent years. Overdose deaths involving opioids increased 44%, from 2,939 in 2019 to 4,233 in 2020 among New York state residents, according to a recent report. Many others are living with the major health, social and financial challenges associated with opioid addiction. An update to the CDC's 2016 guidance will help clinicians equip patients with optimal pain management strategies, while reducing the risks associated with opioid use during this time.

HANYS appreciates the diligent and thoughtful process undertaken to develop the guidelines. We strongly support the statements indicating that the guidelines are voluntary and the need for flexibility to the meet patients' unique clinical needs.

HANYS suggests that the CDC also include considerations for offering the best possible care in resource-limited situations. For example, as noted in the guidelines, there will be patients who cannot access care at the recommended follow-up intervals. Partnering with community organizations, other care providers and using telehealth may help clinicians adhere to the guidelines in these circumstances.

If you have questions, contact me at 518.431.7730 or jgold@hanys.org, or Sarah DuVall, director, behavioral health, at 518.431.7769 or sduvall@hanys.org.

Sincerely,

Jeff Gold, Esq.

Senior Vice President and Special Counsel, Managed Care and Insurance