



Physicians for Responsible Opioid Prescribing

164 West 74th Street  
New York, NY 10023

[www.supportprop.org](http://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.<sup>1</sup> 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.

---

<sup>1</sup> 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

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

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

Sherrie Rubin  
Director  
The Hope2gether Foundation  
San Diego, CA

Janet Colbert  
CEO, STOPPNOW  
Broward County, FL

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

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

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

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

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

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

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

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

Gary Mendell  
Founder, CEO  
Shatterproof  
New York, NY

Raymond V. Tamasi  
President/CEO  
Gosnold on Cape Cod

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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