

June 15, 2018

Centers for Disease Control and Prevention  
1600 Clifton Road, NE, Mailstop S106-9  
Atlanta, Georgia 30329

**Re: Request for Comment, Docket No. CDC-2020-0029**

The American Chiropractic Association (ACA) appreciates the opportunity to submit comments regarding the Centers for Disease Control and Prevention's (CDC) request for information related to nonpharmacological treatments to address pain management.

ACA, the largest organization in the United States representing doctors of chiropractic (DCs), is leading the chiropractic profession in the most constructive and far-reaching ways—by working hand in hand with other health care professionals, by supporting meaningful research, and by using that research to inform chiropractic practice. ACA members pledge to adhere to the highest standards of ethics and patient care, contributing to the health and well-being of the estimated 35 million individuals across the country who seek chiropractic care each year.

We are encouraged by CDC's interest in finding alternatives to opioids. We at ACA contend that a number of nonpharmacological interventions can provide beneficial effects on pain and/or function in patients with chronic low back pain, chronic neck pain, osteoarthritis, fibromyalgia and chronic tension headaches. These conditions constitute the majority of chronic pain diagnoses in the United States and are especially apparent in our senior population. The evidence is especially supportive for those with moderate or severe intensity of pain that has persisted for greater than one year.

We would like to recommend consideration of the following research in the CDC's pursuit of alternatives to opioids:

**Chronic Low Back Pain**

Goertz CM, Long CR, Vining R, Pohlman KA, Kane B, Corber L, Walter J, Coulter I. [Assessment of chiropractic treatment for active duty, U.S. military personnel with low back pain: a study protocol for a comparative effectiveness clinical trial with adaptive allocation \(ACT 1\)](#). *Trials* 2016;17:70. doi: 10.1186/s13063-016-1193-8.

This trial evaluated the effects of the addition of chiropractic care to usual medical care on lower back pain (LBP) pain and disability. A pilot study compared chiropractic care plus standard medical care with standard medical care alone for active-duty military personnel with acute LBP. Improvements in pain and disability were significantly greater in the chiropractic care group. This comparative effectiveness study evaluated whether these prior findings can be reproduced in a larger sample, across multiple sites and with varied populations, including individuals with subacute and chronic LBP.

**Chronic Neck Pain**

Côté, P., Wong, J.J., Sutton, D. et al. [Management of neck pain and associated disorders: A clinical practice guideline from the Ontario Protocol for Traffic Injury Management \(OPTIMa\) Collaboration](#). *Eur Spine J* (2016) 25: 2000. doi.org/10.1007/s00586-016-4467-7.

The OPTIMa guidelines included studies similar to those in a recent Agency for Healthcare Research and Quality (AHRQ) review; however, they concluded with a stronger recommendation, advocating use of spinal manipulation/mobilization combined with exercise and massage for chronic neck pain.

### **Chiropractic Care for Older Medicare Patients**

Weeks, William B et al. [The Association Between Use of Chiropractic Care and Costs of Care Among Older Medicare Patients With Chronic Low Back Pain and Multiple Comorbidities](#)

*Journal of Manipulative and Physiological Therapeutics*, Volume 39, Issue 2, 63 - 75.e2.

This study found that older multiply-comorbid patients who used only chiropractic manipulative treatment (CMT) during their chronic low back pain (cLBP) episodes had lower overall costs of care, shorter episodes, and lower cost of care per episode day than patients in the other treatment groups. Further, costs of care for the episode and per episode day were lower for patients who used a combination of CMT and conventional medical care compared with patients who did not use any CMT. These findings support initial CMT use in the treatment of, and possibly broader chiropractic management of, older multiply-comorbid cLBP patients.

### **Chiropractic Care for Younger Medicare Patients**

Weeks, William B. et al. [Cross-Sectional Analysis of Per Capita Supply of Doctors of Chiropractic and Opioid Use in Younger Medicare Beneficiaries](#). *Journal of Manipulative and Physiological Therapeutics*, Volume 39, Issue 4, 263-266.

This study finds that a higher number of chiropractors per capita is strongly correlated with a lower proportion of Medicare patients who fill opioid prescriptions; in short more chiropractors could mean fewer opioid prescriptions for younger Medicare beneficiaries.

### **Reduced Medicare Costs with Chiropractic Care**

Davis MA, Yakusheva O, Gottlieb DJ, Bynum JP [Regional Supply of Chiropractic Care and Visits to Primary Care Physicians for Back and Neck Pain](#). *J Am Board Fam Med*. 2015 Jul-Aug; 28(4):481-90. doi: 10.3122/jabfm.2015.04.150005.

Researchers have estimated that chiropractic care may reduce the number of Medicare patient visits to primary care medical physicians for back and/or neck pain, resulting in annual savings of \$83.5 million to the Medicare program.

### **Chiropractic Associated with Lower Likelihood of Opioid Use**

Kazis LE, Ameli O, Rothendler J, Garrity B, Cabral H, McDonough C, et al. [Observational retrospective study of the association of initial healthcare provider for new-onset low back pain with early and long-term opioid use](#). *BMJ Open*. 2019;9(9):e028633.

This study, which reviewed the claims of more than 200,000 people with commercial or Medicare Advantage plans, concluded that initial visits to chiropractors or physical therapists is associated with substantially decreased early- and long-term use of opioids.

Whedon JM, Toler AWJ, Goehl JM, Kazal LA. [Association Between Utilization of Chiropractic Services for Treatment of Low-Back Pain and Use of Prescription Opioids](#). *J Altern Complement Med*. 2018;24(6):552-556. doi:10.1089/acm.2017.0131

Researchers found that the adjusted likelihood of filling an opioid prescription was 55% lower among recipients of chiropractic care compared with nonrecipients. Average charges per person for opioid prescriptions were also significantly lower among chiropractic care recipients.

Nonpharmacological therapies have become a vital part of managing chronic pain. These can be used as stand-alone therapies; however, nonpharmacological treatments often are used to augment and complement pharmacological treatments. Choice of non-pharmacological intervention is determined by the nature of each case, what works for a specific patient and the skills of the clinician. However, the research is clear: Noninvasive, nonpharmacological interventions may present less risk to the patient than invasive or pharmacological measures, underscoring the need for greater access to and integration of these safe and affordable alternatives.

If you have any questions regarding our comments or need more information, please contact [jfalardeau@acatoday.org](mailto:jfalardeau@acatoday.org) or (703) 812-0214.

Respectfully,

A handwritten signature in black ink that reads "Robert C. Jones, DC". The signature is written in a cursive, flowing style.

Robert C. Jones, DC  
President