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A Position Statement from the American Academy of Pain Medicine (AAPM)

Washington State Agency Medical Directors Group (AMDG) Published Guidelines on Opioid Dosing for Chronic Non-Cancer Pain

The American Academy of Pain Medicine (AAPM) represents physicians in the specialty of Pain Medicine. AAPM opposes the Washington State Agency Medical Directors Group published guidelines on Opioid Dosing for Chronic Non-Cancer Pain and stands in agreement with the public positions of the American Pain Society and the American Pain Foundation. AAPM shares major concern about the serious public health crisis of prescription drug abuse that stimulated development of these guidelines. However, we believe that the solution to this public health crisis must involve education of physicians and medical trainees on safe and effective opioid prescribing practices, not in enacting policy which further restricts the prescribing of opioids. Recognition of adverse effects of opioids, including over-dosage, drug abuse and diversion, must receive serious action. Likewise, the well documented public health crisis of under-treated pain must also be addressed.

Despite well-intentioned efforts to address prescription drug abuse, the AAPM believes that, by enacting the Washington State AMDG published guidelines on Opioid Dosing for Chronic Non-Cancer Pain, there is a likely potential for increasing the existing under treatment of chronic pain. Although specialty consultation may be helpful for many patients in pain, a state level recommendation for such a consultation, without a plan for ample access to appropriate specialists or reimbursement for such consultation for the majority of patients who might require such care, will only lead to reluctance for physicians to treat chronic pain, and greater suffering for legitimate patients in pain. The core problem with the AMDG guidelines is that many physicians may be unable to obtain the required consultations and will fear that if they do not follow the guideline they will be viewed as practicing beneath the standard of care. Such a provocative message from the state government without clearly defined and ample resources for implementation will negatively impact the willingness of physicians to treat pain. As a result, legitimate patients who deserve and would otherwise receive appropriate dosing with opioids may be left with increasing obstacles to care. The AAPM cannot support the WA state guidelines until the state can clarify how the required consultations will be made available and funded. Other major concerns about the Washington State AMDG Opioid Dosing Guidelines include:

- Lack of scientific evidence supporting any positive outcomes such as safety or diminished harm
- Flaws in the one retrospective study (Franklin et al, 2005) upon which the guidelines are primarily based

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- Unintended consequences including restrictions and additional barriers to patients who experience pain
- Potential discrimination against patients in pain without a cancer diagnosis
- Lack of definition of, or criteria for, a pain specialist
- Lack of definition of, or criteria for, terms such as "drug-seeking behavior" which pose great potential for inappropriate and discriminatory application

AAPM believes that efforts to improve the two public health problems of prescription drug abuse and under-treated pain must include education on effective and responsible use of controlled substances for medical students and physicians at all levels. Educating our physicians may well help to obviate the need for restrictive policies such as the Washington State AMDG Guidelines on Opioid Dosing for Chronic Non-cancer Pain.

Approved AAPM Executive Committee, October 2007

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