

From: Richard A. Lawhern, PhD
Co-Founder, Alliance for the Treatment of Intractable Pain

January 20, 2021

Endorsements:

Mark Rose. BS, MA
Andrea Trescot, MD
Past President, American Society for Interventional Pain Physicians
Robert Rust MD
Helen Borel, RN, BA, MFA, PhD
Norman J Clement, DDS
Fred Brown, Patient Advocate
Barry Ulmer,
Executive Director, Chronic Pain Association of Canada

To: Agency for Healthcare Research and Quality
David Meyers, M.D. Acting Director, david.meyers@ahrq.hhs.gov
Arlene Bierman, M.D., M.S., Director, Center for Evidence and Practice Improvement, arlene.bierman@ahrq.hhs.gov
P. Jeffrey Brady, M.D., M.P.H., Director Center for Quality Improvement and Patient Safety, jeff.brady@ahrq.hhs.gov
Jeffrey Toven, Director/AHRQ Chief Operating Officer, Office of Management Services, jay.toven@ahrq.hhs.gov

CC: Seema Verma, Director US HHS Centers for Medicare and Medicaid
Nora Volkow, MD, Director US National Institute on Drug Abuse
Office of the Deputy US Secretary of Health and Human Services
Office of the Commissioner, US Food and Drug Agency
Senior Staff, US House Congressional Oversight Committee [separate cover]
US Government Accountability Office
Board of Scientific Advisors, National Center for Injury Prevention and Control,
US CDC CDC-INFO Gateway, US Centers for Disease Control and Prevention
American Medical Association Opioid Task Force
Washington Legal Foundation
Human Rights Watch

BCC: ~500 medical professionals, patients, caregivers, and media editors

Subject: AHRQ Comparative Effectiveness Review 240 (Treatments for Acute Pain)
Must Be Immediately Withdrawn

Dear Dr Meyers and Senior Staff,

This correspondence follows on my previous email of September 15, 2020 [Ref].
I write to request that you take the following measures with regard to the recently published AHRQ “Comparative Effectiveness Review on Treatments for Acute Pain”.

This request is endorsed by medical professionals and subject matter experts noted above. You may expect to receive additional endorsements by separate emails.

1. The above-titled report must be immediately withdrawn from the AHRQ website for a major rewrite. Grounds for this action include multiple gross errors of methodology and apparent cherry-picking of “evidence” to support a transparently political and scientifically invalid agenda for broad suppression of prescription opioid therapies in the treatment of acute pain. [atch 2] In its published form, this report represents an irresponsible assault on the lives of millions of US patients who will reliably be denied safe and effective treatment for acute pain, due to its specious assertions.

2. AHRQ must convene a timely 60-day Red Team Review of medical evidence submitted herewith or otherwise received in the first-round response to the draft report during September to October, 2020. This review must be conducted independently from the AHRQ research team and peer reviewers who contributed to the published report. The Red Team Review should include members of the Opioid Task Force of the American Medical Association, as well as multiple patient advocates familiar with the medical literature of pain. A revised draft of this Red Team Review should be circulated for 90-day public comments in the Federal Register, prior to any final publication.

3. Pending these major revisions, the Director of AHRQ must notify the Board of Scientific Advisors of the National Center for Injury Prevention and Control that the December 2020 comparative outcomes review has been withdrawn for review and revision, and may not be used as a resource in ongoing CDC revisions of their 2016 guidelines on prescription of opioids to adults with chronic non-cancer pain.

I look forward to your formal acknowledgement of this email correspondence. May I hear from you on or before January 31, 2020?

Sincerely,

Richard A. Lawhern, PhD
Alliance for the Treatment of Intractable Pain
Facebook: <https://www.facebook.com/red.lawhern>
My Publications: <http://www.face-facts.org/Lawhern>

Ref: Richard A. Lawhern, PhD., AHRQ correspondence by email, subject “Courtesy Copy – Comments Submitted to AHRQ”, September 13, 2020. Attachment is re-forwarded herewith.

Attachments:

[1] Comments on “Treatments for Acute Pain – A Systematic Review (AHRQ), Richard A Lawhern PhD, September, 2020

[2] “Methodological Errors in “Treatments for Acute Pain – A Systematic Review (AHRQ)”, Richard A Lawhern PhD, January 2021