



January 11, 2016

National Center for Injury Prevention and Control
Centers for Disease Control and Prevention
4770 Buford Highway NE., Mailstop F-63
Atlanta, GA 30341

Re: Docket No. CDC-2015-0112: Proposed 2016 Guideline for Prescribing Opioids for Chronic Pain

Dear Sir or Madam,

The American Society of Hematology (ASH) appreciates the opportunity to submit comments to the Centers for Disease Control and Prevention (CDC) in response to the Agency's Proposed 2016 Guideline for Prescribing Opioids for Chronic Pain as published in the Federal Register (CDC 2015-0112) on December 14, 2015.

ASH represents more than 15,000 clinicians and scientists worldwide committed to the study and treatment of blood and blood-related diseases. These diseases encompass malignant hematologic disorders such as leukemia, lymphoma, and multiple myeloma and non-malignant conditions such as hemophilia, sickle cell anemia, and venous thromboembolism.

On October 1, 2015, ASH submitted comments on a previous draft of the proposed guidelines. The Society suggested that the scope of the guidelines be clarified to exclude patients with Sickle Cell Disease and patients undergoing active treatment for cancer. Management of pain in these clinical contexts is complex, and better addressed by existing guidelines (e.g. Evidence Based Management of Sickle Cell Disease: Expert Panel Report, National Heart, Lung and Blood Institute). ASH supports the changes made in this version of the guideline, which more explicitly excludes Sickle Cell Disease or Cancer.

Thank you for your consideration of ASH's comments. The Society looks forward to continuing to work with you to ensure patient access to safe and effective treatments. Please contact Robert M. Plovnick, MD, MS, ASH Director of Quality Improvement Programs (rplovnick@hematology.org or 202-776-0544), if we can provide additional information or expertise.

Sincerely,

A handwritten signature in black ink that reads "Charles S. Abrams".

Charles S. Abrams, MD
President