



**AdvaMed, the Advanced Medical Technology Association  
Statement for the Record  
Energy and Commerce Health Subcommittee Hearing “Combating the Opioid Crisis:  
Improving the Ability of Medicare and Medicaid to Provide Care For Patients”  
April 11, 2018**

AdvaMed commends the Subcommittee for its ongoing work to address the opioid epidemic. As members of the Subcommittee know, the opioid epidemic is devastating individuals, families and communities throughout the United States. We appreciate your focus on this critical issue and the opportunity to provide input from the perspective of medical technology innovators.

AdvaMed is the world’s largest association representing manufacturers of medical devices, diagnostic products, and medical information systems. AdvaMed member companies produce technologies that are transforming health care through earlier disease detection, less invasive procedures and more effective treatments. AdvaMed’s members produce nearly 90 percent of the health care technology purchased annually in the United States and more than 50 percent of such technology purchased annually around the world. AdvaMed members range from the largest to the smallest medical technology innovators and companies. Nearly 70 percent of our members have less than \$30 million in annual sales.

Medical technologies play an important role in combatting the opioids crisis. Medical technology solutions have the potential to reduce our country's dependence on opioids in many ways, including:

- serving as alternatives to manage acute and chronic pain before the first opioid is prescribed;
- monitoring pain and medication use;
- blocking difficult withdrawal symptoms and preventing overdose;
- improving medication management, lowering dependence and addiction, and monitoring dosage; and
- preventing diversion and inappropriate access to opioids.

Additionally, medical technology companies are developing innovations that are minimally-invasive, enabling patients to return to routine activities in a shorter period of time, while experiencing less pain and discomfort after surgery.

There are a number of policies related to medical technology that can help address the opioid crisis affecting our nation, and we are pleased to see that several of the bills being considered by the Subcommittee incorporate these ideas. We understand a multi-faceted legislative approach is

needed. We respectfully request that the following ideas be integrated into the Committee's legislative efforts:

- **Increased educational opportunities regarding technology alternatives for pain management, surgical pain minimization, addiction treatment and proper dispensing and disposal of opioids are critical.** While the opioid crisis is widely known and discussed, opioid-related education for patients, physicians and our healthcare workforce is needed. This education should address medical technology alternatives to opioids for chronic and acute pain management, such as outlined in the FDA's recently issued "Opioid Analgesic REMS Education Blueprint for Health Care Providers Involved in the Treatment and Monitoring of Patients with Pain." Some of these technologies may reduce pain (i.e., minimally invasive surgery), substitute for pharmacologic pain relievers, limit the time and dosage of opioids used, or help to manage addiction and monitor use. In the Medicare program, the opportunity to educate beneficiaries should begin at the first "Welcome to Medicare" physical with an initial pain assessment.
- **Appropriate steps should be taken to address the coverage, coding, and payment challenges related to the use of medical technology alternatives to opioids.** Medicare's coverage, coding, and reimbursement policies should be reviewed and amended to encourage utilization of medical devices and other non-opioid pain management alternatives that can minimize reliance on opioids before the first prescription is written to treat acute, chronic, and surgical pain. The extent to which various opioid alternatives are currently covered, not covered, have limited coverage and face payment challenges should be addressed.
- **New quality measurement activities and metrics for physicians and providers related to pain management and use of non-opioid alternatives should be developed.** These might include requiring CMS to add clinical improvement activities related to the opioid crises to the improvement activity list for MIPS; requiring CMS to develop quality measures (or encouraging measure stewards) in the opioid space which address utilizing non-pharmacologic alternatives; requiring CMS to develop quality measures which incentivize providers to adopt minimally invasive surgical approaches that result in reduced post-surgical pain and opioid use.
- **Medicare policies should promote appropriate dispensing and disposal of opioid products.** While coverage and payment of opioid alternatives is important, proper dispensing and disposal of unused opioids is also a key to addressing the opioid crisis. Medical technology can assist in addressing the problem of improperly disposed of opioids both in and outside healthcare settings. Proper disposal of opioids can be incentivized by evaluating and modifying its requirements for dispensing and disposal of controlled substances that are included in Medicare's Conditions of Participation; providing workforce training and education on proper disposal of controlled substances and the impact drug diversion has on patient safety; and requiring data collection on the extent to which hospitals are maintaining a robust chain of custody of controlled substances from dispensing until disposal.

Additionally, Congress should also request a GAO report to: (1) conduct an assessment of data available on rates of proper dispensing and disposal of controlled substances in hospitals and other health care facilities; (2) study the extent to which controlled substances are being dispensed and disposed of in hospitals consistent with current federal standards, and (3) issue recommendations for improving proper dispensing and disposal of controlled substances in hospitals, including the detection and prevention of drug diversion.

Thank you for tackling this important issue that threatens every part of our country. We are committed to working with you to address the opioid crisis in America and to help ensure that patients have the care options they need.