



ACUPUNCTURE  
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BETTER HEALTH THROUGH BETTER INFORMATION

July 10, 2017

Anna K. Abram, Deputy Commissioner for Policy, Planning, Legislation and Analysis  
Division of Dockets Management (HFA-305)  
Food and Drug Administration  
Rockville, MD 20852

**Submitted electronically**

**Re: Docket No. FDA-2017-D-2497 for “Draft Revisions to FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioids; Request for Comments.”**

Dear Deputy Commissioner Abram:

We thank the FDA for encouraging feedback on its education blueprint addressing how health care providers (HCPs) can manage and support their patients suffering pain.

The Acupuncture Now Foundation is a U.S.-based, international non-profit organization dedicated to educating the public, healthcare providers, and health policymakers about the practice of acupuncture. Our mission is to provide accurate, evidence-based information regarding the state of acupuncture research and to correct misunderstandings about acupuncture’s clinical potential. We seek to work with mainstream healthcare providers and institutions as well as other complimentary, integrative disciplines in order to help them better understand the strengths and weaknesses of acupuncture as a healthcare resource as well as the state of the profession of acupuncturists as a workforce. We encourage all interested parties to contact our organization for further information.

As a leading proponent of the art and practice of acupuncture, we are encouraged by the inclusion in the May 2017 draft of the Education Blueprint of the following recommendation: *HCPs should be knowledgeable about the range of available therapies, when they may be helpful, and when they should be used as part of a multidisciplinary approach to pain management.* The draft also proposes encouraging HCPs to advise their patients about the potential benefits of nonpharmacological therapies including complementary therapies such as acupuncture. We support and agree with those statements and wish to provide information regarding acupuncture and its potential as a pain management resource.

Although acupuncture has been used successfully to ease pain for more than 2,000 years there is a great deal of confusion regarding the benefits and validity of this therapy, to include its potential in combating the opioid epidemic. In the attached paper – “Acupuncture in Pain Management: Strengths and Weaknesses of a Promising Non-Pharmacologic Therapy in the

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Age of the Opioid Epidemic” – we attempt to help both FDA research analysts and HCPs understand the role acupuncture can play in managing pain. The evidence presented shows that acupuncture more than meets the burden of scientific proof regarding its effectiveness in a number of pain-related conditions for which opioids are commonly prescribed.

What follows is an Executive Summary of the information provided, a brief review of the latest acupuncture research and related information as it pertains to pain management, a summation of the most salient resources providing more comprehensive information, and an overview of workforce considerations regarding acupuncturists and acupuncture services. When the CDC was drafting their new opioid prescribing guidelines, they received comments from several mainstream medical groups pointing out that it would be problematic for HCPs to follow the recommendation to rely more on non-pharmacologic pain management therapies due to limited insurance coverage and a lack of vetted guidelines for using such therapies. We include some of those comments in our paper and respond to those concerns as they are a practical impediment to HCPs following this recommendation. Our Foundation is most interested in working with mainstream groups to address their concerns.

We also respond to critics such as some of those who submitted arguments here against including acupuncture in the FDA Blueprint and claiming the evidence shows acupuncture to be “nothing more than a placebo.”

While this paper was drafted as our Foundation’s submission to the FDA for consideration in their blueprint for prescriber education, we anticipate that many policymakers and other interested parties are or will want information on acupuncture and we hope this paper will prove helpful. We plan for the attached position paper to be a living document to be updated accordingly as more research is conducted and more information becomes available. We invite all interested parties to make use of this resource and look for updates by visiting our website ([www.AcupunctureNowFoundation.org](http://www.AcupunctureNowFoundation.org)) or contacting us directly by email ([info@acupuncturenowfoundation.org](mailto:info@acupuncturenowfoundation.org)).

Regards,

Matthew Bauer, L.Ac.  
President, Acupuncture Now Foundation