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The implementation of the CDC Guidelines for prescribing opioids for pain (legally enforced by the DEA or through attorney general litigation) has had detrimental repercussions adversely affecting patients and the practice of medicine. How is the CDC soliciting and collecting data on progression of disease, injury, or skeletal degradation as a result of doctors dismissing pain as a symptom and neglecting or delaying diagnostic or imaging testing, referral to a specialist, and treatment for the cause of pain? The CDC has criminalized treating pain and forced physicians to pursue ineffective wellness & patient self care, delaying or preventing actual medical care, causing sometimes irreparable harm to patients.

The entirety of this CDC request for comments is primarily concerned about the costs and inconvenience to the agency in receiving and collecting information as to the impact of the CDC guidelines as opposed to actually accessing the detrimental effects to patients and the practice of medicine.

As to proper functions of the agency, the guidelines were outside the function and purpose of the CDC. That they were created within the agency with little transparency and disclosure for the purpose of eliminating opioid medication in the practice of medicine, and without scientific or medical consensus, this request now (as result of public pressure) for limited information collection is an insulting and obvious retroactive intent to appear to follow federal agency policy guidelines and to imply that the CDC has met evaluation requirements which as regards the Guidelines for opioid prescribing, the agency never has. Do better.