



The National Center for Homeopathy (NCH), a major US organization composed of both consumers and integrative health practitioners, welcomes the opportunity to comment on the Health and Human Service (HSS) Draft Report, Pain Management Best Practices: Updates, Gaps, Inconsistencies, and Recommendations. As an organization representing homeopathy, we would like to offer some comments and suggestions about Complementary and Alternative Approaches and a strong recommendation to include homeopathic treatment in the Report as part of comprehensive pain management.

Comments on Draft Report:

1. We agree with the HSS recommendation to prioritize pain medications according to risk and patient need.

Recommendation: We strongly suggest that practitioners begin pain treatment with non-chemical pharmacologic approaches, such as homeopathy, along with, or as an alternative to chemical pharmacology.

2. We are happy to see that the HSS Report has devoted content to Complementary and Integrative Health, which we believe is key to effectively managing pain and reducing opioid dependency.

3. We agree with the observation that an impediment to complementary and alternative treatment is the lack of education of both the physician and the patient. **Recommendations:** **1.** It is incumbent on the modern physician to be familiar with and refer patients to practitioners of other safe approaches to healing and pain relief. **2.** Medical schools should expand their elective or brief courses on multi-modal approaches to emphasize complementary and alternative approaches for pain management. **3.** Likewise, doctors need to realign patient expectations away from drug-based treatment to safe, natural methods for healing and pain relief. **4.** Public health education needs to be broadened to include homeopathy and other complementary and alternative approaches as first-line pain treatment options.

4. The greatest obstacle to accessing complementary and alternative treatment is the omission of coverage in the current medical care payment system. This defies both health economics and Section 2706 of the Affordable Care Act, which addresses equal payment for integrative health practitioners. The majority of integrative health practitioners and homeopaths specifically are not licensed physicians; therefore, there is no access to coding or private insurance coverage and CMS reimbursement. This restricts treatments to those who can pay out of pocket only and denies these treatments to lower income or indigent patients. **Recommendation:** Coverage of non-pharmacologic treatments by insurance companies and CMS would bring the advantages of natural and safe pain treatment options to those who are struggling most with opioid overdose and addiction and would make non-pharmacologic approaches as available as insurance-paid opioids.

5. Research money needs to be devoted to these complementary and integrative modalities. Non-pharmacological treatments receive much less funding than pharmaceuticals, and funding is not available on the community level where most of these practitioners work. **Recommendation:** Clinical decisions about the use of these treatments should be evidence-INFORMED, including clinical observations and historical use, not solely evidence-based research.

6. **Recommendation:** We request that homeopathy, be included in Section 2.6, Complementary and Integrative Health, to inform practitioners about its role in reducing pain and enhancing health.

Why include Homeopathy for non-pharmacologic pain therapy? Homeopathy is an effective, holistic system of medicine, with minimal side-effects and no toxicity. It fulfills the parameters of a pre-eminent therapy-- least invasive, least expensive, and least likely to cause adverse reactions. As a non-chemical medicine, harmful consequences, such as addiction, tolerance and polypharmacy that occur with chemical-based medicines, are

nonexistent. Properly prepared homeopathic medicines, as regulated by the FDA, have an impeccable safety record,¹⁻⁴ and their effectiveness is supported by 200 years of clinical case data and robust research.⁵⁻⁹

Homeopathy has the advantage of reducing pain while enhancing the healing of injuries and damaged tissues, which can prevent the development of chronic pain syndromes. Homeopaths recognize and treat a wide variety of acute and chronic pain: nociceptive, neuropathic, mixed and visceral. Homeopathy methodology reviews for mental, emotional, physical, and environmental triggers – the global approach that is required for effective pain management. Alone or in combination with other modalities, homeopathic treatment has a deep, rapid, and safe healing response.

According to the *National Center for Complementary and Integrative Medicine survey of 2012*, a division of NIH, and the Veterans Administration, the public is requesting and have a great interest in integrative modalities, with an increased interest in homeopathy as a non-pharmacologic alternative to opioids.¹⁰⁻¹³

Recommended Paragraph for insertion in Section 2.6 Complementary and Integrative Health

Homeopathy is an individualized, holistic system of medicine that engages and stimulates the natural healing ability of the body. It is non-toxic, has minimal side-effects, and does not cause addiction or bacterial resistance. Homeopathic medicines have an impeccable safety record verified in many studies.¹⁻⁴ Clinical case data confirm effectiveness in a wide range of conditions, both acute and chronic and research supports its effectiveness superior to placebo and in many cases more effective than conventional medicine.⁵⁻⁹ Studies show the effective use of homeopathy in peri-operative pain, migraine headaches, musculoskeletal injuries, and a wide variety of acutely painful illnesses.¹⁰⁻²⁴ Homeopathy practitioners conduct assessments that include the whole person, integrating mental, emotional and physical symptoms, as well as vitality, general health and well-being, and support individualized treatment. Homeopathy is low-cost, easily-accessed and well-accepted by patients. Manufacture of homeopathy products is regulated by the FDA under the 1938 Food, Drug and Cosmetic Act (FDCA).

Thank you for considering these comments on the HHS Draft Report.

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