



December 15, 2020

President-Elect Joe Biden, Jr.
The Honorable Joseph R. Biden, Jr.
President-elect
1401 Constitution Ave. NW
Washington, DC 20230

Dear President-Elect Biden,

On behalf of the **Integrative Health Policy Consortium (IHPC)** (www.ihpc.org), we are writing to congratulate you on your election. We look forward to working with your new Administration. During this transition period, we want to raise several priorities that are leadership opportunities for your Administration, and that are important to our professional organizations and to the wellbeing of Americans.

IHPC's (www.IHPC.org) mission is to eliminate barriers to health. IHPC includes 26 organizations representing more than **650,000 state licensed, certified pursuant-to-state-law, and/or nationally certified healthcare professionals and academic, research, clinical and public education organizations that assist in generating nearly \$27 billion annually in the U.S. economy**, including MDs, RNs, LAcS, DCs, NDs, LMTs, etc. IHPC is active in and supports the integrative health professional team approach that the nation is employing to combat COVID-19. This approach applies the full spectrum of care, continuously informed by the best scientific evidence, to optimally treat every patient and inform the public during this critical time. This team approach *integrates* the best of (1) conventional medicine, from diagnosis through treatment and recovery (2) optimal delivery of effective preventive and health-enhancing practices and (3) evidence-based non-medication therapies to treat physical and mental health challenges. According to reports published by the National Center for Health Statistics, an estimated 59 million individuals in the United States use some type of integrative health approach.

IHPC works closely with the **Bipartisan Congressional Integrative Health & Wellness Caucus** on Capitol Hill, co-chaired by Congresswoman Judy Chu (D-CA) and Congresswoman Jackie Walorski (R-IN). This Caucus recognizes the value of health promotion and disease prevention and provides a non-partisan educational forum for legislators to receive up-to-date information related to best practices and new research from experts in the field. It provides an opportunity for Congressional Members to discuss legislative and regulatory opportunities to expand access to integrative health care and promote wellness strategies.

During this critical transition period, IHPC wants to communicate its priorities and interests in four key areas: leadership, implementation of the HHS Pain Management Best Practices

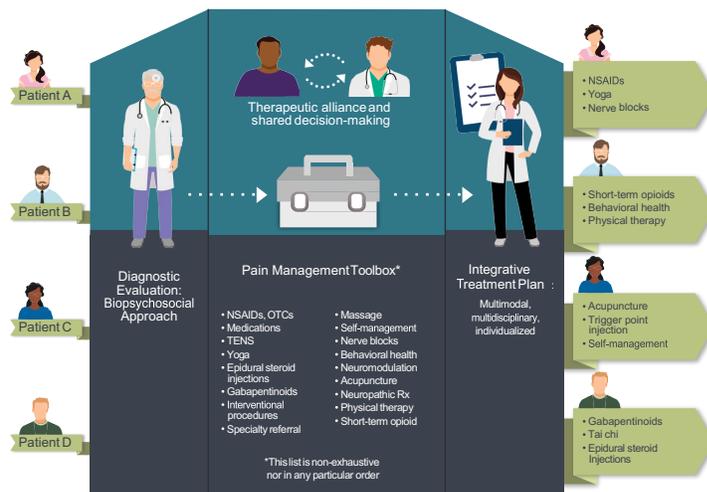
Interagency Task Force Report recommendations, expansion of integrative health care services and coverage, and funding.

Leadership

We urge your Administration to carefully consider appointing individuals, especially within the Department of Health and Human Services (HHS), who are experts in the programs and policies that they will be responsible for managing. HHS and its operatives require immediate leadership from individuals who understand and appreciate not only the mission of each HHS agency, but who are also committed to strengthening these agencies. IHPC supports the appointment, particularly at the Centers for Medicare & Medicaid Services (CMS) and Health Services and Resources Administration (HRSA), of individuals who are not only qualified, objective, and support the delivery of equitable health care services, but also embrace an integrative health perspective. Beyond HHS, IHPC also endorses the appointment of senior officials at the Department of Veterans Affairs who will continue and enhance the Department's provision of integrative health care services to our nation's veterans, and their whole health program commitment retained and funded.

Implement HHS Pain Management Best Practices Interagency Task Force Report

HHS issued in May of 2019 the final [report](#) of the 29-member, non-partisan body of the Pain Management Best Practices Inter-Agency Task Force. The Task Force's mandate was to "identify gaps, inconsistencies and updates, and to make recommendations for best practices for managing acute and chronic pain." The report includes detailed recommendations to improve pain treatment, many of which could be addressed by HHS. One of the overriding key issues noted throughout the report is **the need for individualized, multi-modal pain treatment, as well as coverage of a plethora of non-pharmacological treatments including complementary and integrative health practices such as** massage therapy, restorative therapies (therapeutic exercise), innovative medical devices including those delivering neuromodulation, and behavioral health approaches such as cognitive behavioral therapy. The report has been widely hailed and endorsed by more than 160 national healthcare organizations, and its recommendations promise the dual benefits of addressing chronic pain treatment while mitigating the potential for substance abuse.



Individualized patient care consists of diagnostic evaluation that results in an Integrative Treatment Plan that includes all necessary treatment options.

Unfortunately, despite this strong demonstration of support, the Report's Best Practices recommendations largely have not been implemented. To address this oversight, the House and Senate Appropriations Committees included language in recent reports accompanying their Fiscal Year 2021 Labor, Health and Human Services and Education Appropriations bills, urging HHS to begin implementing these recommendations. Some of the key recommendations IHPC urges the Biden-Harris Administration to pursue include:

- Require HHS and relevant agencies to update federal policies and educational materials to include multidisciplinary pain management and the Task Force's Pain Management Toolkit as best practices to treat acute and chronic pain.
- Commission a GAO report to assess CMS coverage of non-opioid therapies and compliance with pain management best practices.
- Require CDC in collaboration with NIH to collect, analyze, and publish acute and chronic pain epidemiology data on an annual basis so we have an accurate understanding of the enormity of the problem and whether interventions pursued are making progress in addressing the problem.
- Direct HHS to conduct a public awareness and educational campaign to inform Americans about the differences between acute and chronic pain and the wide range of evidence-based non-opioid treatment options included in the Task Force report such as chiropractic, acupuncture, massage therapy, therapeutic exercise, innovative medical devices and behavioral therapy.
- Direct HHS to widely disseminate the Task Force report and key findings to state public health departments, licensing boards and medical societies throughout the country.

Expansion of Integrative Health Care Services and Coverage

Currently, several innovative federally funded programs are delivering integrative health care services to some of our nation's most vulnerable populations. IHPC urges the new Administration to support two of these programs, the Whole Health System of Care at the Department of Veterans Affairs and the Federally Qualified Health Centers (FQHCs) programs managed by HRSA.

- **VA Whole Health System of Care** - In 2018, the VHA began implementing its 3-year Whole Health System of Care (WHSC) pilot program. This program meets the intent of the Comprehensive Addiction Recovery Act by delivering patient-centered care and

complementary and integrative health approaches to our nation's Veterans, especially those who are struggling with opioid use disorder and chronic pain. Preliminary results are promising and point to improved health and cost outcomes. The VHA WHSC program is an unprecedented opportunity to showcase the successful application of a comprehensive Integrative Whole Person approach to health in a federal system that serves one of the largest constituencies in the country. For that reason, the House Appropriations Committee included report language accompanying its FY 2021 Military Construction, Veterans Affairs and Related Agencies bill, urging the VA to "promote and expand" the Whole Health System of Care. We urge new VA leadership to heed the advice of Congress and expand the WHSC.

- **HRSA's Federally Qualified Health Centers (FQHCs)** - In recent years, especially with the onset of the nation's opioid crisis, [FQHCs have emerged as a platform for Integrative Whole Health innovation and for the delivery of non-pharmacologic pain management services](#). During the COVID-19 pandemic, select FQHCs have expanded their services to deliver pain management services to an increased number of uninsured and underinsured individuals. IHPC urges the Biden-Harris Administration to prioritize funding for FQHCs and to expand to support their mission as focal points for delivering equitable health care services.
- **CMS – Expand Medicare & Medicaid Coverages** - In addition to expanding the delivery of integrative health care services, IHPC urges the new Administration, especially at CMS, to work with Congress and the integrative health care community to expand Medicare and Medicaid coverage of services provided by all state-licensed, certified pursuant-to-state-law, and/or national certified health providers. Our community recognizes the complexity and costs associated with such proposed coverage expansions. We endeavor to work with your Administration to address these issues and develop policies that will fairly compensate state-licensed, certified pursuant-to-state-law, and/or national certified health providers for their services and provide patients with a full spectrum of health care services.
- **HRSA's National Health Service Corps** - Finally, we urge the Administration to expand HRSA's National Health Service Corps to include integrative health professionals who are state licensed, certified pursuant-to-state-law, and/or nationally certified providers. Broadening eligibility for this fundamental federally funded training program will help address current and projected shortages in our nation's health care workforce.

Funding

As your Administration develops its first budget and identifies funding priorities, IHPC wishes to express strong support for investments in several federal agencies and programs. In particular, we urge the Biden-Harris Administration to support robust funding and sustained investment in the following federal agencies: Center for Medicare and Medicaid Services; Health Resources and Services Administration (especially the Federally Qualified Health Centers program); National Institutes of Health, and in particular the National Center for Complementary and

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Integrative Health (NCCIH); and, the Department of Veterans Affairs (particularly the VA Whole Health System of Care).

Thank you for considering our priorities throughout the Administration's transition and first formative years. Please do not hesitate to contact us if our organization can be of assistance to you.

Sincerely,
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