



NATIONAL GRANGE

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American Values. Hometown Roots.

March 8, 2021

Vaccines and Related Biological Products Advisory Committee
Food and Drug Administration
U.S. Department of Health and Human Services
10903 New Hampshire Avenue
Silver Spring, MD 20993

RE: Docket No. FDA-2021-N-0134

Dear Members of the Committee:

The National Grange is the oldest general farm and rural life organization in the United States. Now in its 153rd year, the Grange has worked at the local, state, and national level to address the needs and concerns of its members, their friends and neighbors, as well as all rural Americans. The health concerns of rural America have been and remain one of our organization's highest priorities. A disproportionate number of poor, elderly, disabled, and those with chronic health conditions live in rural areas. The impact of dealing with chronic pain is a real issue for them.

While chronic pain and pain management are a very real challenge for millions of Americans, life in the United States' rural areas presents a unique set of challenges for the chronic pain community. The Centers for Disease Control and Prevention found that 24% of rural adults suffer from chronic pain, compared to 18% of urban dwellers. In fact, our recent survey found that more than three-quarters of Grange members live with chronic pain—more than half from arthritis. These startling statistics demonstrate just how vital access to care is. Unfortunately, access to care is one of the most challenging problems in rural America.

To adequately address the needs of these patients, we must first acknowledge the disparities they face. The National Rural Health Association found that only 12% of physicians and 8% of specialists practice in rural areas, despite 20% of Americans living there. As such, Americans suffering from chronic pain in rural areas must travel farther distances to receive care than those in urban areas. This is exacerbated by the fact that many rural medical facilities have been shut down in recent years.

As we consider the unique challenges rural pain patients face compared to the rest of the country, we must also remember that rural America has been tragically affected by the opioid crisis. As of 2017, Americans in rural areas have been dying from drug overdoses at a higher rate than in cities, according to the Centers for Disease Control and Prevention (CDC). Furthermore, three-quarters of farmers have been

directly impacted by opioid abuse, according to a survey by the American Farm Bureau Federation and National Farmers Union.

The high percentage of adults suffering from chronic pain in rural America, paired with the extreme shortage of health care clinicians—and even greater shortage of pain and addiction specialists—creates a catalyst for prolonged and unnecessary suffering. If we do not address this issue head-on, rural Americans will continue to experience pain and addiction issues that will be left untreated.

The National Grange recently adopted a resolution to prioritize and address chronic pain issues in rural America. We pledge to support more research to help identify the causes of chronic pain in rural life and what we can do to address them. The Grange will also support national and state initiatives that encourage the research and development of new therapies and non-addictive treatment options to treat and manage pain. These priorities are shared across our membership, as more than half of Grange members place a high priority on the development of new treatment options for chronic pain. Notably, we must advance treatment options that are safe, effective, and fit the unique needs of rural Americans living in pain.

On behalf of our membership, more than three-quarters of whom suffer from chronic pain, the National Grange urges the Committee to support the development and approval of new, non-addictive treatment options to manage chronic pain symptoms.

Respectfully,

A handwritten signature in black ink that reads "Betsy Huber". The signature is written in a cursive, flowing style.

Betsy Huber
President