

RE: Comments on The National Prevention and Health Promotion Strategy (National Prevention Strategy)

The National Association of State Alcohol and Drug Abuse Directors (NASADAD) and its component group, the National Prevention Network (NPN) appreciates the opportunity to comment on the National Prevention and Health Promotion Strategy. NASADAD represents State Substance Abuse Agency Directors who oversee and implement efficient and holistic prevention, treatment and recovery systems. NPN represents State Prevention Coordinators, who work with State Agency Directors to ensure the provision of high quality and effective alcohol, tobacco, and other drug abuse prevention services in each State. As the Council works to develop the National Prevention and Health Promotion Strategy, we urge consideration of the State role in prevention activities and for the Council to include in the Strategy how the Federal government can partner and coordinate with States.

NASADAD is very pleased the National Prevention and Health Promotion Council (The Council) was created by the Patient Protection and Affordable Care Act (PPACA) and is required to develop the National Prevention and Health Promotion Strategy. The Council is of utmost importance in setting forth a prevention strategy that will improve the health and quality of life for families, individuals and communities by focusing on wellness and prevention. We are extremely pleased the Council has included the following as draft strategic directions:

- Counter Alcohol/Substance Misuse
- Tobacco-Free Living

Counter Alcohol/Substance Misuse

According to the most recent National Survey on Drug Use and Health, there were 21.8 million Americans aged 12 and older who were current users of illicit drugs. The negative impact of this pressing public health problem can be seen through premature mortality, violence and other criminal activity, academic problems, economic costs and more. Alcohol and drug abuse costs the United States economy over \$600 billion annually in increased health care costs, crime, and lost productivity (illicit drug abuse: \$181 billion, alcohol abuse: \$235 billion, and tobacco: \$193 billion).¹

Prevention is especially necessary as it relates to prescription drug abuse and underage drinking and should be a focus of the group. Prescription drugs have become the most abused drugs (second only to marijuana) with nearly 7 million individuals abusing prescription painkillers—more than the number who are abusing cocaine, heroin, hallucinogens, ecstasy and inhalants, combined.² The Drug Enforcement Administration notes that “40 percent of teens and an almost

¹ Office of National Drug Control Policy (2004). *The Economic Costs of Drug Abuse in the United States, 1992-2002*. Washington, DC: Executive Office of the President (Publication No. 207303).; Rehm J, Mathers C, Popova S, Thavorncharoensap M, Teerawattananon Y, Patra J. Global burden of disease and injury and economic cost attributable to alcohol use and alcohol-use disorders. *Lancet*. 2009 Jun 27;373(9682):2223-33; Centers for Disease Control and Prevention. *Best Practices for Comprehensive Tobacco Control Programs—2007*. Atlanta: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health; October 2007.

² Fact Sheet: Prescription Drug Abuse- A DEA Focus.

http://www.justice.gov/dea/concern/prescription_drug_fact_sheet.html

equal number of their parents think abusing prescription painkillers is safer than abusing “street” drugs”.³ Moreover, misuse of painkillers represents three-fourths of the overall problem of prescription drug abuse. Furthermore, 25 percent of drug related emergency department visits are associated with abuse of prescription drugs.⁴

Alcohol is the third leading cause of preventable deaths with 79,696 deaths per year. Annually, about 5,000 deaths among individuals under 21 are attributable to underage drinking. Studies have found that 51.6 percent of individuals aged 12 or older reported being current drinkers of alcohol, which translates to an estimated 129 million individuals. In 2008, heavy drinking was reported by 6.9 percent of the population aged 12 or older, or 176.3 million individuals.

Prevention saves lives and money. Effective substance abuse prevention can yield major economic dividends. Prevention is the most cost effective way to save money and counter substance abuse. Every dollar invested in research-based substance use prevention programs, strategies and activities has the potential to save up to \$7 in areas such as substance abuse treatment and criminal justice system costs.⁵ However, substance use/abuse prevention has been under-utilized and under-resourced. While the Strategic Directions focus on countering alcohol/substance misuse, there needs to be more emphasis placed on primary prevention of illegal drug use, alcohol abuse and prescription drug abuse. It is essential to explicitly emphasize the prevention of alcohol and substance use/abuse. Prevention should be conducted across the life span to include young adults and senior citizens. While targeted prevention on individuals 18 and under are often a priority as programs can effect social emotional development, it should not be the only age focus.

Tobacco-Free Living

Effective tobacco prevention services are beneficial to both health and the economy. Currently, there are 3.4 million high school students who are smokers, of which, males make up 19.8 percent and females 19.1 percent. According to the Campaign for Tobacco-Free Kids, approximately 400,000 individuals die from cigarette smoking each year and 8.6 million individuals currently suffer from smoking caused illness. The total annual public and private health care expenditures caused by smoking reached \$96 billion by October 2010. This consists of \$30.9 billion in annual federal and State government smoking caused Medicaid payments; \$27.4 billion federal government smoking caused Medicare expenditures; and \$9.6 billion in other federal government tobacco caused health care costs.⁶

With tobacco prevention, for each one percentage point decline in adult and youth smoking rates in the country, 615,000 adults would be saved from dying prematurely and for high school smokers 56,000 individuals would be saved from a premature death. The monetary benefits show that over five years, the savings from smoking affected birth reduction would reach \$365.9

³ Fact Sheet: Prescription Drug Abuse- A DEA Focus.

http://www.justice.gov/dea/concern/prescription_drug_fact_sheet.html

⁴ Fact Sheet: Prescription Drug Abuse- A DEA Focus.

http://www.justice.gov/dea/concern/prescription_drug_fact_sheet.html

⁵ National Institute on Drug Abuse. (2007). *Research Update from the National Institute on Drug Abuse — Drug Abuse is a Preventable Behavior*. Bethesda: MD. Available: <http://www.drugabuse.gov/tib/prevention.html>.

⁶ “Toll of Tobacco in the United States”. Campaign for Tobacco-Free Kids. 10.08.10.

<http://www.tobaccofreekids.org/research/factsheets/pdf/0072.pdf>

million and savings from heart attack and stroke reductions would be \$1 billion.⁷ Studies show that prevention and national smoking declines increase public and private sector worker productivity and strengthen the country's economy along with reducing public and private smoking-caused health care costs.

State's Substance Abuse Prevention Programs

States play an important role in building capacity and managing a coordinated federal, State and Local effort to prevention that results in a measureable change in priority populations. As the Council moves forward with prioritizing prevention programs, NASADAD urges it to consider the 20 percent set aside of the SAPT Block Grant, which substance abuse prevention programs; Strategic Prevention Framework State Incentive Grants (SPF-SIG); and SPF-SIG's spinoff grant Partnerships for Success.

- Federal statute requires States to direct at least 20 percent of the Substance Abuse Prevention and Treatment (SAPT) Block Grant toward substance abuse prevention services. The SAPT Block Grant's prevention set-aside represents 64 percent of State-coordinated prevention funding. In 21 States, the prevention set-aside equals 75 percent or more of the State agency's prevention budget. The prevention service funding varies from State to State. Some States rely solely on the block grant's 20 percent set-aside to fund their entire prevention system; others use the funds to target gaps and enhance existing program efforts.⁸ The States can assist the Council with developing new practice knowledge; promoting effective models and disseminating science-based approaches to prevention. NPNs work jointly with communities and federal programs to build an infrastructure to address and decrease substance abuse. States are an essential component for promoting effective and collaborative prevention among schools, parents, law enforcement and the community.
- The Strategic Prevention Framework State Incentive Grants (SPF-SIGs) are a direct mechanism for implementing prevention practices. The SPF-SIGs are infrastructure grants for activities to help grantees build a solid foundation for delivering and sustaining effective substance abuse services. These grants recognize States have very diverse populations and give States latitude to utilize funds, resources, and research-based approaches that meet the needs of underserved populations that have been identified through local needs assessment. Grants are also essential in preventing the onset and reducing the progression of substance abuse among underage populations; reducing substance abuse related problems in communities; and building prevention capacity infrastructure at the community level.
- The Partnerships for Success Program seeks to help achieve a quantifiable decline in Statewide substance abuse rates by helping States partner with community coalitions to implement evidence-based, data-driven programs, practices and policies. In particular, funding is directed to States to address gaps in prevention services and increase the ability of States to help specific populations or geographic areas with serious, emerging substance abuse problems. States receiving Partnerships for Success funds will (1) leverage and coordinate State-wide prevention-related resources, leadership, technical support and

⁷ "Benefits and Savings from Each One Percentage Point Decline in the USA Smoking Rates". Campaign for Tobacco-Free Kids. 06.15.10 <http://www.tobaccofreekids.org/research/factsheets/pdf/0235.pdf>

⁸ SAMHSA: 20% Prevention Set-aside- Substance Abuse Prevention and Treatment Block Grant (SAPTBG). http://www.samhsa.gov/budget/b2005/spending/cj_39.aspx

monitoring, (2) set measurable, need-based, State-wide performance targets for substance abuse prevention, and (3) partner with identified community coalitions to meet targets. Communities will work closely with States to implement evidence-based programs, policies and practices, guided by the five steps of the Strategic Prevention Framework (SPF). The program has been funded since 2009.

Furthermore, by working through States very important environmental strategies may be applied, which are used to change an environment that contributes to substance use/abuse. This includes implementing National and Statewide campaigns to change behaviors and changing laws and practices that would:

- Reduce access to and availability of alcohol, tobacco and drugs;
- Inform attitudes and perceptions about the dangers and acceptability of alcohol, tobacco and drug use;
- Change social norms about alcohol, tobacco and drug use;
- Raise awareness about the costs and consequences of alcohol, tobacco and drug use;
- Enforce consequences for alcohol- and drug-related offenses, such as the sale of alcohol and tobacco to minors, as well as the sale of illicit drugs

Again, NASADAD and NPN applaud the Council for prioritizing substance abuse/misuse and tobacco. As mentioned, we urge the Council to provide more of a focus on prescription drug abuse, underage drinking and primary substance abuse prevention across the lifespan. As the Council moves forward with drafting a National Prevention and Health Promotion Strategy, NASADAD is happy to be a resource. We look forward to partnering with The Council.

Sincerely,

Robert Morrison