

## **RE: Comments on the December 22, 2010 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 (NPS) released on December 22, 2010. NASADAD represents State substance abuse agency directors (SSAs) 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.

NASADAD is very pleased the National Prevention and Health Promotion Strategy include prevention of alcohol and substance use/abuse across the lifespan. We also appreciate the specific mention of the need to prevent prescription drug abuse under SD 6. We recommend adding over-the-counter drugs and products. According to the 2010 Monitoring the Future Survey, the use of over-the-counter drugs and products were relatively high in past year prevalence. For example, the annual rates of non-medical use of cough/cold medicines for 8<sup>th</sup>, 10<sup>th</sup> and 12<sup>th</sup> graders were 3.2%, 5.1% and 6.6% respectively. The annual rates for use of inhalants were 8.1%, 5.7% and 3.6% for 8<sup>th</sup>, 10<sup>th</sup> and 12<sup>th</sup> graders respectively. As this data shows, the misuse and abuse of over-the-counter products and drugs is an issue that needs to be addressed. In addition, we are grateful the Council again included the following as draft strategic directions and recommends these continue to be a targeted strategic direction of the Strategy:

- Reduce Alcohol and Drug Abuse (*SD6*)
- Tobacco-Free Living (*SD5*)

According to the Centers for Disease Control and Prevention (CDC) excessive alcohol consumption and tobacco use are modifiable health risk behaviors that lead to chronic diseases such as heart disease, cancer and stroke. These chronic diseases count for more than 50 percent of all deaths each year. In addition studies show a relation between alcohol consumption and unintentional and intentional injury. Preventing substance abuse early improves health outcomes and reduces injury such as falling, motor vehicle crashes, suicide and homicide.

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 the importance of coordination between SSAs, NPN and the federal government, other State agencies and local communities. We strongly urge this coordination to be included in the cross-cutting strategic directions and the targeted strategic directions. Below are examples of successful programs that require federal, state and local coordination.

### **State's Substance Abuse Prevention Programs**

States play an important role in building capacity for tested and effective substance abuse prevention strategies, policies and programs as well as 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 valuable lessons learned by the State substance abuse agencies through the 20 percent set aside of the SAPT Block Grant, which supports 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.<sup>1</sup> 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 evidence-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 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 and will align with the National Prevention Strategy. This includes implementing National and Statewide campaigns to change behaviors, laws and practices that would:

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<sup>1</sup> SAMHSA: 20% Prevention Set-aside- Substance Abuse Prevention and Treatment Block Grant (SAPTBG). [http://www.samhsa.gov/budget/b2005/spending/cj\\_39.aspx](http://www.samhsa.gov/budget/b2005/spending/cj_39.aspx)

- 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

More specific comments we hope you will consider as you define the National Prevention Strategy include:

***(SD3) Prevention and Public Health Capacity***

We support the Strategy's goal of building prevention capacity around the country and encourage the plan to support local level data collection to enhance the use of cross-sector, data-driven planning that leads to the selection, implementation and evaluation of evidence-based strategies. We also recommend a bullet be included that reads, "Provide technical assistance to assist local workers and communities adopt data-driven planning and implementation of evidence-based strategies".

***(SD6 and SD7) Reduce Alcohol and Drug Abuse and Healthy Eating***

We highly encourage specific recommendations about prevention of alcohol and other drug use during pregnancy and breastfeeding to prevent Fetal Alcohol Spectrum Disorders (FASD). The Centers for Disease Control and Prevention (CDC) estimate approximately 0.2 to 1.5 cases of fetal alcohol syndrome (FAS) occur for every 1,000 live births in certain areas of the United States and there are at least three times as many cases of less severe symptoms. "The lifetime cost for one individual with FAS in 2002 was estimated to be \$2 million."<sup>2</sup> FASDs are preventable by a woman abstaining from alcohol use while pregnant.

Again, NASADAD and NPN applaud the Council for prioritizing the reduction of alcohol and drug abuse and tobacco-free living. Again, we urge the National Prevention Strategy to also include the role of State substance abuse agencies. Our State/Jurisdiction Association Members have a long history of planning for, implementing, and evaluating community-based tested and effective substance abuse prevention strategies, policies and practices. 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.

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<sup>2</sup> Centers for Disease Control and Prevention. Available at <http://www.cdc.gov/ncbddd/fasd/data.html>.