Dear Dr. Volkow:

On behalf of the American Psychological Association (APA) and its 121,000 members and affiliates, we appreciate the opportunity to offer comments in response to the Request for Information on the outline of the National Institute on Drug Abuse (NIDA) Strategic Plan for Fiscal Years 2021-2025.

APA commends the basic outline of the strategic plan, which is structured to highlight Cross-Cutting Research Topics and Approaches, Priority Research Goals and Actions, and a description of its Scientific Stewardship of Public Resources. APA would appreciate the opportunity to comment on an actual draft of the plan when and if that opportunity becomes available and offers the following comments for consideration in constructing the draft.

Waterborne diseases; worsening asthma and allergies; heat-related stress; and illness and injury related to storms, floods, and droughts. But the connections with mental health are not often part of the discussion.

**Stigma**

APA appreciates the focus on developing approaches to reduce stigma. The lives of people with disease and disability are worsened by stigma, thus leading to public prejudice, loss of self-worth, and negative implications for health and well-being. While stigma is associated with many health conditions, it has an especially devastating impact on those suffering with mental health and substance use disorders (SUD). APA is committed to raising the profile of this subject matter as evidenced by *Stigma and Health*, a successful APA journal which serves as a venue for articles examining research representing stigma in its various guises as it impacts people living with mental and physical illness.
Animal Models
APA recognizes the importance of aligning preclinical and clinical methodologies, which can enhance the predictive validity of preclinical models and increase translation and back-translation of research. For example, preclinical models of drug self-administration may need to better model clinical substance use disorder conditions by incorporating aspects of drug and alternative reinforcer choice into their methods. It is important for NIDA to foster such alignment and promote interaction of preclinical and clinical researchers in order that there can be more continuity between these approaches.

Leveraging Technology and Innovation
NIDA has supported the development of many tools and technologies to advance our understanding and treatment of SUD’s but APA believes there are equally impressive innovations emerging from the behavioral and social sciences. The NIH Common Fund, for example, supports the Science of Behavior Change (SOBC) program promoting the foundational science of psychology and basic research on the initiation, personalization, and maintenance of behavior change, across a range of disciplines including cognitive and affective neuroscience, neuroeconomics, behavioral genetics, and behavioral economics. We expect that the strategic plan will acknowledge this important research and foster greater collaboration. APA recognizes that NIDA is well-represented on the SOBC trans-NIH Working Group and several recently funded projects are directly related to this critical Common Fund activity (e.g., stress reactivity in opioid use disorder, distress tolerance and smoking cessation).

Vaping, Tobacco, Nicotine and Cannabis
NIDA is to be lauded for the highly successful collaboration it has developed with the Food and Drug Administration’s Center for Tobacco Products in fostering regulatory research on tobacco and nicotine. Through this collaboration, FDA funds an important segment of tobacco/nicotine research especially with regard to Electronic Nicotine Delivery Systems (ENDS) and the epidemiology of tobacco use (e.g., Population Assessment of Tobacco and Health – PATH study), and the Tobacco Centers of Regulatory Science. APA recommends that tobacco/nicotine research receive additional attention in the strategic plan commensurate with the dramatic rise of nicotine and cannabinoid vaping in teenage youth. APA believes NIDA’s strategic plan must keep pace with, and anticipate, the emergence of new drug delivery devices and increasing cannabinoid use as cannabis access continues to increase across the country.

Longitudinal Research
APA commends NIDA’s commitment to longitudinal research including the on-going Adolescent Brain Cognitive Development (ABCD) study which has set new standards for recruitment and retention and has served as a remarkable testbed for the development of new imaging technologies and the integration and evaluation of large complex data sets. NIDA should take note of the fact that most of the Principal Investigators involved in the ABCD study are psychological scientists trained in a wide array of psychology subdisciplines. The success of ABCD bodes well for the recently piloted HEALthy Brain and Child Development study which will follow a large cohort of pregnant women and their children for at least 10 years to monitor physical, social, emotional, and cognitive development.
Race and Justice Involved Populations
APA commends NIDA’s explicit acknowledgement that racial minorities are disproportionately involved in the criminal justice system and believes this should be included in the plan and inform both research on justice involved populations and health disparities. APA believes the strategic plan should take advantage of the attention criminal justice reform is receiving during the COVID pandemic as sentencing guidelines, especially in non-violent offender populations, are being carefully re-examined. NIDA may never again have such an opportunity to highlight the public health benefit and economic return on investment of research on combining pharmaco- and psychosocial therapies in pre-release and paroled offender populations, the value of early intervention in juvenile justice populations, and the use of “Seek, Test, Treat and Retain” to stem the tide of HIV infection across those involved with the criminal justice system.

Specific Recommendations on Goals and Actions

Goal 1
APA suggests that NIDA rephrase Action 1.1 under Goal 1 which currently reads “Advance basic neuroscience and understand the neurological impact of drug use”. APA recommends that NIDA use the more inclusive phrasing “neurological, psychological, and behavioral impact of drug use” to avoid limiting the focus of this important action to neurobiological mechanisms, causes and treatments. NIDA should place an imperative on social and behavioral research as these approaches seem most promising in helping understand and treat specific classes of substance abuse disorders (e.g. methamphetamine and other stimulants). In previous iterations of NIDA’s strategic plans, social influences have been mentioned, but primarily within the context of epigenetic changes. It is extremely important to recognize that individuals are embedded within a deeper social context, and this social context can have a dramatic influence on substance use that can override genetics and biology.

Goal 2
APA suggests that NIDA include a specific Action under Goal 2 dedicated to scaling-up prevention programs that have already proven effective in addition to testing novel prevention strategies. The current Goal 2 over-emphasizes specific substances and underemphasizes the use of universal prevention programs. Further, APA recommends that NIDA include cost-effectiveness research in this Action, to answer questions concerning return on investment of prevention vs. treatment.

Goal 3
APA recommends including an Action highlighting NIDA’s commitment to research relevant to military personnel, veterans, and their families under Goal 3. APA believes the Draft should highlight that research and the close collaborations that NIDA maintains with health protection and readiness programs at the Department of Defense. These are uncertain times and understanding war stressors and substance use will continue to be a crucial area of investigation. The disincentives to seek treatment for substance use disorders in the military, including possibility of discharge, reduced confidentiality of medical records, potential career consequences, and stigma related to treatment make such research all the more critical. Increasing battlefield survival rates also mean that service personnel are returning with significant traumatic injury, pain, and a high prevalence of prescription drug and alcohol use.
The relationship between PTSD and prescription drug misuse is one example of how comorbid conditions may contribute to vulnerability for substance use disorders. Research should continue to address the problem of opioid addiction after exposure to opiate medications for the treatment of chronic pain.

**Scientific Stewardship – Workforce Diversity**

APA appreciates the NIH focus on diversity and its attempt to better understand glaring racial disparities in funding of projects from Black investigators. Some research suggests that those disparities may be related to topic and indicate that applications from Black scientists were significantly more likely to involve human subjects and were distributed differently across study sections compared with applications overall, with more falling under the Division of AIDS and Behavioral, and Population Sciences. Because NIDA funds considerable research under these study sections, NIDA should become more proactive in developing a solution to erase these disparities.

Again, APA commends the overall scope of this outline and appreciates the opportunity to offer these comments. If you have any questions or need additional information from APA, please contact Dr. Geoff Mumford, Senior Director of Science Policy at gmumford@apa.org or 202.336.6067 (or 202.595.4232 during the pandemic).

Sincerely,

Jaime Diaz-Granados, Ph.D.
Acting Chief Science Officer