

November 3, 2016

Submitted electronically to feedback@ondcp.eop.gov.

Office of National Drug Control Policy (ONDCP)
750 17th St NW
Washington, DC 20006

RE: Submission of Comments in Response to the guidance document on *Changing the Language of Addiction*

Dear Sir or Madam:

The National Council for Behavioral Health (National Council) welcomes the opportunity to submit comments on the Office of National Drug Control Policy's guidance document on *Changing the Language of Addiction*.

The National Council is the unifying voice of America's community mental health and substance use treatment organizations. Together with our over 2,900 member organizations, we serve our nation's most vulnerable citizens – more than 10 million adults and children living with mental illnesses and addictions.

We commend ONDCP for bringing attention to the addiction crisis in the United States. As an agency, ONDCP has supported many efforts to expand the availability of addictions services, and now by creating an appropriate, unified language for the field of addiction ONDCP will encourage more people affected by substance use to access those services. Inappropriate terminology perpetuates negative stereotypes about people living with addictions, creating a disincentive for individuals to seek treatment for their disease. Only 1 in every 10 people in need of addiction treatment receive services and discrimination against individuals with substance use disorders contributes to this problem.

In that context, we offer the following comments to the proposed guidance document.

Use of People First Language

We support the recommendation that individuals and organizations adopt "person-first language." Individuals should not be defined by any health condition or disability. Our language should reflect this by using the terms like "person with a substance use disorder or addiction," instead of labeling people as "addicts" or "substance abusers." Research has shown that using person-first language can change negative public perceptions.

Addiction is a Disease

Addiction, clinically known as substance use disorder, is a primary, chronic disease. We agree with the guidance document's classification of substance use disorder as a chronic brain disease. Contrary to popular perception, addiction is not a moral failing nor a condition that individuals can control. Like other chronic diseases, addiction requires long term treatment and often involves multiple cycles of treatment.

Additionally, some perceive addiction medicine to be less advanced and scientifically-based than other branches of health care. However, ONDCP's guidance should make clear that addiction medicine is on par with other medical specialties with clinicians utilizing a number of evidence-based cognitive, behavioral, and medication therapies to treat addictions. We appreciate ONDCP's specific clarification that medication-assisted treatment is an effective treatment for addiction that does not simply trade one drug for another.

Continuum of Addiction

Within the guidance's document's discussion of addiction as a disease, ONDCP should note that the successful treatment of addictions requires a full continuum of care including prevention, treatment, and recovery supports and services. Our language should reflect that no single course of treatment is appropriate for all individuals, rather there are many pathways to recovery from alcohol and drug addiction.

ONDCP should further add to its guidance document terms that show the stages of substance use to further the understanding of the process of addiction. Our society is not divided into individuals that use substances and those that do not. There is continuum of substance use ranging from no use to physical and mental dependence.

Avoid Using Slang Terms and Celebrate Recovery

We agree with the recommendation that people avoid using slang terms to describe people with substance use disorders and instead use clinically accurate, non-stigmatizing terminology. For instance, people with addictions should not be referred to as "clean" or "dirty" based on the results of drug screening.

Finally, the National Council encourages ONDCP to expand the guidance document "Person in Recovery" section to recommend the sharing and promotion of stories of recovery from addiction. Stories should highlight that recovery is not solely based on abstinence from using drugs and alcohol, but involves improved functioning across all sectors of person's life such as work, physical health, and relationships with friends and family. In the media, most of the attention is focused on untreated addiction and the devastating effects that follow. Members of the addiction field, including government agencies, can change that narrative by showing that treatment works and individuals and families do recover from addiction.

Thank you again for your continued leadership on this important issue. We look forward to working with ONDCP and other federal agencies to change the conversation around addiction.

Sincerely,



Linda Rosenberg, MSW
President & Chief Executive Officer
National Council for Behavioral Health