

Massachusetts Prevent Injuries NOW! Network

February 6, 2007

National Institute on Drug Abuse
Attn: Draft Strategic Plan
6001 Executive Blvd.
Suite 5213, MSC 9561
Bethesda, MA 20892-9561

RE: Public Comments on NIDA Draft Strategic Plan

Dear Sir or Madam:

Please consider the follow comments regarding the proposed NIDA Strategic Plan. The National Institute for Drug Abuse is the nation's leading agency devoted to Drug Abuse. As such, we wish to comment on the lack of attention paid to the public health issue of drug-related poisonings in the draft strategic plan.

After careful consideration, the Massachusetts Prevent Injuries Now! Network, a statewide coalition of more than 45 injury prevention organizations in both the public and private sectors, has developed these comments to reflect the views of our public health and public safety experts on drug abuse prevention.

Drug-related poisonings need to be addressed from both a prevention and treatment standpoint. Any strategic plan supporting research to prevent and treat drug abuse should support the development and improvement of surveillance around drug poisonings. Injury prevention practitioners currently work with data that is unable to present a full picture of the drug poisoning problem and circumstances surrounding the poisoning incident. By including surveillance improvements in the strategic plan, NIDA and individual states can better understand the patterns of drug abuse as related to drug poisonings, thus improving prevention and treatment efforts.

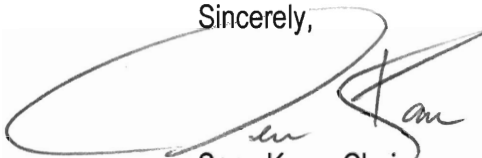
Here in Massachusetts, poisonings are the leading cause of injury fatality.ⁱ More than 800 residents died from poisoning in 2005, which is 2.5 times the number of motor vehicle occupant fatalities in the state that same year. The number of poisoning fatalities has consistently increased over the last 10 years, driven largely by the increase in opiate-related poisonings.ⁱⁱ As the NIDA supported Monitoring the Future survey has shown, prescription drug abuse is on the rise. At the state level, we are in need of better data sources and research on this issue to effectively deliver prevention and intervention programming.

Massachusetts is not the only state battling this problem. We ask that NIDA carefully consider integrating drug-related poisonings into the strategic plan based on the following:

- In 2004, poisoning became the second leading cause of death by injury in the United States following motor-vehicle traffic deaths.ⁱⁱⁱ
- CDC reported that nine of ten poisoning deaths were caused by drugs, particularly prescriptions and illegal drugs^{iv}
- National rates for poisoning deaths increased 68.3% from 1990-2004.^v
- During the same time period, between 1999-2004, 23 states saw increases of 100% or more^{vi}

As injury prevention professionals in Massachusetts, we feel that any Strategic Plan approved for the National Agency on Drug Abuse must address the issues raised by the drug-related poisonings that are driving our disturbing injury fatality data trends. We ask that during this public comment period, the NIDA Strategic plan reevaluate its future goals and objectives to ensure they accurately reflect the current patterns of drug abuse. ^{vii}

Sincerely,



Sean Kane, Chairman
Mass Prevent Injuries NOW! Network

ⁱ Massachusetts Dept. Of Public Health, Injury Surveillance Program. Opioid Trends 2007. (document attached).

ⁱⁱ Massachusetts Dept. Of Public Health, Injury Surveillance Program. Opioid Trends 2007. (document attached).

ⁱⁱⁱ CDC. CDC Wonder. Compressed mortality file, 2004. Available at <http://wonder.cdc.gov/mortsql.html>.

^{iv} CDC. CDC Wonder. Compressed mortality file, 2004. Available at <http://wonder.cdc.gov/mortsql.html>.

^v MMWR Weekly, February 9, 2007/ 56 (05); 93-96 Unintentional Poisoning Deaths, United States, 1999-2004.

^{vi} MMWR Weekly, February 9, 2007/ 56 (05); 93-96 Unintentional Poisoning Deaths, United States, 1999-2004.