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September 22, 2009

Norman Augustine
Chair, Scientific Management Review Board
OD/NIH Bldg 1 Rm 103
9000 Rockville Pike
Bethesda, MD 20892

Dear Mr. Augustine:

On behalf of the American Psychiatric Association (APA), a national medical specialty society whose 38,000 physician members specialize in diagnosis, treatment, prevention and research of mental illnesses including substance use disorders, I welcome the opportunity to comment on the Scientific Management Review Board's (SMRB) deliberations regarding the possibility of a merger between the National Institute on Alcohol Abuse and Alcoholism (NIAAA) and the National Institute on Drug Abuse (NIDA).

From a scientific perspective, a merger between NIAAA and NIDA makes sense. The Institute of Medicine's 2006 Report "Genes, Behavior and the Social Environment: Moving Beyond the Nature/Nurture Debate" made clear that translational research was the scientific pathway for addiction research and improvements in treatment. Such translational research could be greatly fostered and enhanced by a NIAAA-NIDA merger. The current division has conceptual limitations-- it does not even represent a break between licit and illicit drugs, given that studies of nicotine are generally supported by NIDA. Given commonalities in areas such as biology, culture, and frequent use of multiple substances, there are logical reasons to have a single Institute devoted to substance use disorders. The field of addictions research and medicine - and ultimately patients - would be well served if there is greater dialogue and work between current research groups. While dialogue already occurs to some extent, it seems likely there would be eventual enhancement and increased productivity in addictions research if such a merger occurred.

From a practical perspective, a NIAAA-NIDA merger would not be without concern. Extramural and intramural research funding in these areas is already far lower than their relative public health importance and should not be jeopardized. Differences in social aspects of alcohol and nicotine versus illicit drug use are also worth noting and attention should be given to maintaining appropriate research efforts to improve prevention and treatment efforts in these different social environments. While we recognize that NIH cannot guarantee

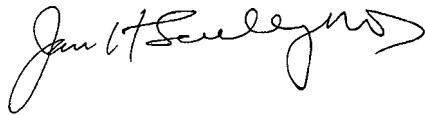


there will not be budgetary cuts, there are serious concerns about the potential size of any budgetary reduction that are justified on the basis of administrative reductions, since the degree of administrative duplication is at times overestimated.

While the operationalization of a merger does present challenges that must be carefully monitored and addressed, including the organizational challenges of combining two Institutes of disparate sizes, these challenges and concerns should not stand in the way of scientific advancement. The science of addiction research, the potential for improved treatments, and the promise for improving the lives of patients and their families, leads the APA to support a proposed merger between NIAAA and NIDA.

The American Psychiatric Association appreciates this opportunity to provide input on this topic to the Scientific Management Review Board. Please contact APA's Director of Research, Darrel A. Regier, M.D., M.P.H., dregier@psych.org if the APA can be of further assistance as the SMRB's discussions progress.

Sincerely,

A handwritten signature in black ink, appearing to read "James H. Scully, Jr.", with a stylized flourish at the end.

James H. Scully, Jr. M.D.
CEO and Medical Director