

## TALKING POINTS

### PREMISE:

NIH should not attempt to separate the health consequences of addiction from the addictive behavior that is seeking a compulsive use despite the known adverse health consequences.

### SCIENTIFIC CONCERNS:

- The scientific mechanisms of addiction are more dissimilar than similar. For example, studies of twins and adopted children show that offspring of alcoholics are at far greater risk for alcoholism but those of drug abusers are at no greater risk for drug use disorders.
- Alcohol research utilizes a “systems biology” approach – addressing the impact on the entire body and each organ system – that drug abuse research does not. This approach will be lost in a single addiction institute resulting in reduced commitment to research regarding liver, pancreas, and other end-organ damage.
- Since the Institute of Medicine (IOM) recommended “considering” this issue a decade ago, science has crystallized the differences in the two fields making the recommendation dated, at best.
- Science is impacted by the different legal status of the two substances: In the case of alcohol, the goal is to reduce harm and balance with the social and health benefits; for drugs, the goal is total abstinence in a legal environment that prohibits use.
- In those areas where there are scientific similarities among alcohol abuse; drug abuse; tobacco use; over-eating and other behaviors, there are already various means to involve disparate institutes.

### PUBLIC HEALTH CONCERNS:

- Alcohol has an enormous public health impact – it causes five times more deaths than illicit drugs.
- Only 13 percent of Americans with an alcohol problem or alcoholism also abuse illicit drugs. Far more use tobacco. Yet the focus on its unique research which impacts so many more Americans will be lost with the dissolution of an institute dedicated to alcohol research.
- Alcohol is a widely available legal substance for adults, while illicit drugs are illegal for all people (with the minor exception of medical marijuana in some states).
- Alcohol research involves behavioral research on delaying first use until a legal age, while drug abuse research is always targeted at total abstinence from an illegal substance.

### PROCEDURAL CONCERNS:

- While Congress delegated the power to change ICs to the NIH Director as advised by the SMRB, it should only be used in the most compelling cases to avoid a backlash in Congress regarding the usurpation of their authority.

- In the three years since this was first proposed to the SMRB, there remains no mission statement for the new institute, bringing into question how specific grants can be allocated to an institute without a mission.
- The administrative, logistical and financial cost of this combination of institutes has not been fully assessed by the SMRB as required by law. To stay within the stated goal of a cost-neutral plan, funding for research will have to be reduced. The incremental cost of moving employees and administrative units has not been addressed.
- There has been to date no analysis of the impact on NIDA, NIAAA and NCI or other NIH employees, or on the impact on young researchers potentially entering the field during this period of uncertainty.