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April 8, 2022

Jill Bowen, PhD
Commissioner
Division of Community Behavioral Health
Department of Behavioral Health and Intellectual disAbility Services (DBHIDS)
1101 Market St, Suite 700
Philadelphia, PA 19107

Re: PSAM Support for Reinstating Tobacco-Free Treatment Facilities in Philadelphia

Dear Commissioner Bowen,

The Pennsylvania Society of Addiction Medicine (PSAM) encourages your support of efforts to integrate tobacco use disorder treatment objectives into, and maintain tobacco-free facilities in, Pennsylvania's behavioral healthcare system. Pennsylvania residents with substance use disorders (SUDs) deserve evidence-based care, which includes treating tobacco use disorder concurrently with other SUDs. Unfortunately, that does not happen consistently across Pennsylvania.

Tobacco-free treatment settings and treating tobacco use disorder in behavioral health settings can increase improved health outcomes. Between 65-87% of patients in addiction treatment smoke tobacco, significantly higher than the rates of smoking among the general population. Additionally, over half of people with SUDs die due to tobacco-related causes. Contrary to common misconceptions, treating tobacco use disorder concurrently with the treatment of other SUDs is not associated with negative effects on recovery outcomes. Evidence supports that the continued use of tobacco products following SUD treatment significantly increases the odds of relapse and reduces the probability of achieving long term recovery among a population disproportionately affected by the harms of tobacco use in the first place.

Data shows only about half of mental health treatment facilities and just over 60% of SUD treatment facilities in Pennsylvania screen for tobacco use; even fewer facilities provide treatment. Philadelphia was a leader in this space. The United States Substance Abuse and Mental Health Services Administration (SAMSHA) released an Advisory in 2019 to help clinicians working in behavioral health facilities implement a tobacco cessation program, as SAMHSA noted the benefits of cotreatment. One of the actions to be taken is to create a tobacco-free environment. SAMSHA notes that there are fears when implementing these policies, but the literature suggests these fears are unfounded and the policies prove to be popular.

Unfortunately, the city of Philadelphia is looking to change its policy on tobacco use within SUD treatment facilities. The new policy allows tobacco use on the premise of SUD treatment facilities. Evidence shows this is not best practices and will not help patients overcome their tobacco use disorders nor will it support their other behavioral health diagnoses.

Our organization strongly supports Pennsylvania's efforts to elevate the care of SUD and bring parity to the treatment of tobacco use disorder and your leadership in this area.

Sincerely,

William Santoro, MD, FASAM

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President, Pennsylvania Society of Addiction Medicine

ⁱ American Society of Addiction Medicine. (2022). Integrating Tobacco Use Disorder Interventions in Addiction Treatment. asam.org. https://www.asam.org/quality-care/clinical-guidelines/tobacco

ii American Society of Addiction Medicine. (2022). Integrating Tobacco Use Disorder Interventions in Addiction Treatment. asam.org. https://www.asam.org/quality-care/clinical-guidelines/tobacco

ⁱⁱⁱ Compton W. The need to incorporate smoking cessation into behavioral health treatment. Am J Addict 2018;27:42 – 3.; Cavazos-Rehg PA, Breslau N, Hatsukami D, et al. Smoking cessation is associated with lower rates of mood/anxiety and alcohol use disorders. Psychol Med 2014;44:2523–35.

iv Hall SM Treatment of smokers with co-occurring disorders: emphasis on integration in mental health and addiction treatment settings Annu Rev Clin Psychol 2009

^v Marynak K, VanFrank B, Tetlow S, et al. Tobacco Cessation Interventions and Smoke-Free Policies in Mental Health and Substance Abuse Treatment Facilities — United States, 2016. MMWR Morb Mortal Wkly Rep 2018;67:519–523. DOI: http://dx.doi.org/10.15585/mmwr.mm6718a3

^{vi} SAMSHA. Advisory: Implementing Tobacco Cessation Treatment for Individuals with Serious Mental Illness: A Quick Guide for Program Directors and Clinicians. September 2019. Accessed at: <a href="https://store.samhsa.gov/product/Implementing-Tobacco-Cessation-Treatment-for-Individuals-with-Serious-Mental-Illness-A-Quick-Guide-for-Program-Directors-and-Clinicians/PEP19-02-00-001