

National Institute for Health and Clinical Excellence

CG51 Drug Misuse Psychosocial Interventions  
Guideline Review Consultation Comments Table  
24 January 2011 –7 February 2011 (9am)

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
RCGP	YES		More exploration of the efficacy of 12 step models. Evidence for residential psychosocial programmes.	
NHS Direct	NO	As this guideline covers the support and treatment required and that patients can expect to be offered I would have thought that it would be beneficial to review these so as to help identify / shape the services required under what will be new commissioning arrangements. That said, there is little new evidence that I am aware of that might change the current recommendations and so perhaps a 12 month extension for review would be in order.		
Addiction Recovery Agency	NO	The Guidelines do not provide a balanced set of guidelines to assist practitioners in delivery treatment focused on recovery. The Guidelines reflect the priorities of	As opposite	The limitations of the NICE research base i.e. range and quantity of research drawn upon, should be

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>research rather than the effectiveness of psychosocial interventions. In particular the guidelines are over weighted in respect of contingency management and poorly weighted in terms of 12 Step based recovery. In this latter respect Prof John Strang has commented: ' Worldwide 12 Step Recovery is probably the single most commonly utilised pathway for recovery - both community based and also through specific residential structured 12 Step Recovery Programmes.' This is not reflected in the guidelines which instead rely on research studies on the effectiveness of contingency management while ignoring the experience of the millions who have recovered through a 12 step programme. The absence of ' scientific proof ' is not reason enough when producing guidelines to ignore the experience of millions simply because they have not been subjected to ' double blind ' research. To do so is to live in some kind of Alice in Wonderland world and the advice given is of no help to practitioners and of serious detriment to those suffering from drug or alcohol dependency..</p> <p>Further the guidelines do not fully articulate the benefits of self help groups 12 Step or</p>		<p>emphatically stated and the use of the term ' Guidelines ' withdrawn and replaced by ' Limited evidence of effectiveness based on limited and incomplete research findings.' To do otherwise would be to ignore the experience of millions of people who have recovered from drug misuse from various interventions, notably 12 Step Recovery but who have not be subjected to a research project. It would also doom many people to partial and possibly inadequate treatment interventions should their treatment practitioner adopt the NICE 'Guidelines ' in practice.</p>

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>SMART ( which is not referred to ) to be of any use to practitioners again in contrast to the amount of space devoted to contingency management. This imbalance should be addressed in revised guidelines.</p> <p>Point 1.5.1.2 is erroneous and seriously questionable when it suggests that referrals to residential treatment should be restricted to those who have ' not benefited from previous community based psychosocial treatment.' This contradicts the basis of treatment interventions being ' person centred' and flies in the face of experience which has shown clearly that gains from community based psycho social interventions can be built upon and consolidated through placements in residential rehabilitation leading to lasting long term recovery.</p>		
British Association for Psycho - pharmacology	YES	The review will become appropriate when there is new evidence, e.g. reporting from current trials of contingency management.		
The Royal College of	YES		We are concerned that the role of Family/Systemic therapy	

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
Psychiatrists, Faculty of child and Adolescent Psychiatry			interventions for Substance misuse was not considered by the review Process. There is sufficient RCTs about this area, albeit from the USA, reg the above in both adults and adolescents. A few related studies ( e.g MST studies that addressed the issue of conduct disorder has clearly shown benefits of family based interventions. We would hope that the above issue will be considered in the next review process, as the outcome of the UK MST studies will be available by then.	
Addiction Recovery Foundation (charity no 328133)	NO The original document is life-threateningly flawed and must be reviewed; if nothing else, review chapter 8 & 1.5.1.2.	<ul style="list-style-type: none"> <li>Only 2% of people in the so-called treatment system are enabled to get drug free.</li> </ul> <p>This because the original document is life-threateningly flawed and must be AMENDED not merely updated/reviewed. In particular, Chapter 8 on Psychological Interventions omits 12-Step Facilitation which has been proven to yield the most clinically effective as well as cost effective service. 8.6.5 refers to “intensive referral” and links to 12-Step-based treatment programmes but it does not discuss the proven technique of 12</p>	The Guideline Development Group Members drew up the original – but, bar perhaps one or two – do NOT know how to get addicts drug free. It must be rewritten by those who do have this proven knowledge and experience, and the development group membership must be appropriate this time round in order to do so, headed up not by prescribers but those who have a track record in getting people off	

**PLEASE NOTE: Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.**

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>Step facilitation. Below is a list of only some errors.</p> <ul style="list-style-type: none"> <li>• Clause 1.5.1.2 states that addicts who have had community-based psychosocial treatment cannot be referred to abstinent rehabs – thus fatally blocking continuum of care and sacrificing the principle of “first do no harm”. This clause has led to such incidents as patients being admitted to rehab after years on methadone and being found to have, despite reports saying no physical problems, broken clavicle and limbs, a stroke and vomiting blood (<a href="http://www.addictiontoday.org/addictiontoday/2011/01/successfully-leaving-treatment.html">www.addictiontoday.org/addictiontoday/2011/01/successfully-leaving-treatment.html</a>)</li> <li>• Point 1.5.1.2 is erroneous in a related context when it suggests that referrals to residential treatment should be restricted to those who have 2not benefited from previous community based psychosocial treatment”. This contradicts the basis of treatment interventions being 'person centred' and flies in the face of experience which has shown clearly that gains from community-based psychosocial interventions can stabilise patients enough to be admitted to residential rehabilitation, leading to sustainable long-term recovery.</li> <li>• In Chapter 8 and elsewhere, there is no mention of the NHS’s own research on how</li> </ul>	<p>drugs and into rewarding lifestyles. Due to the fatal errors and omissions in the first version of the Psychosocial Guidelines, psychological interventions with a track record of getting people off drugs have been excluded from commissioning and contracts, leading to loss of lives including methadone becoming the second-greatest drug killer in the UK. This preventable loss of lives has led to demoralisation across the whole spectrum of care in best-practice agencies which are denied the ability to give appropriate care, including NHS and tier 2/3 agencies as well as tier 4.</p>	

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>amending existing therapeutic techniques even slightly to entice clients into free after/mutual-aid groups can save money and lives.</p> <ul style="list-style-type: none"> <li>• It omits mention of the eclectic therapeutic techniques developed by providers of “classic” recovery which can be used by rehabs and community and prison settings to encourage same, to enable addicts to sustain drug-free recovery and all the attendant benefits of rebuilding relationships, gaining work, reducing recidivism and breaking the generational chain of addiction and dysfunctional behaviours.</li> <li>• Residential and other treatment are not adequately compared, nor the different diagnoses of clients using residential rather than non-residential.</li> <li>• The current document does not provide a balanced set of guidelines to assist practitioners in delivery treatment focused on recovery. The Guidelines reflect the priorities of research rather than the effectiveness of psychosocial interventions. In particular, they are over weighted in respect of contingency management and poorly weighted in terms of 12-step based recovery. In this latter respect, even Prof John Strang commented: “Worldwide 12 Step Recovery is probably the single most</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>commonly utilised pathway for recovery - both community based and also through specific residential structured 12 Step Recovery Programmes". This is not reflected in the guidelines which instead rely on research studies on the effectiveness of contingency management while ignoring the experience of the millions who have recovered through a 12 step programme. It is not reasonable to ignore the experience of millions simply because they have not been subjected to selective ' double blind ' research.</p> <ul style="list-style-type: none"> <li>• Further the guidelines do not fully articulate the benefits of self help groups 12 Step or Smart ( which is not referred to ) to be of any use to practitioners again in contrast to the amount of space devoted to contingency management. This imbalance should be addressed in revised guidelines. The best research on this is collected in <i>Circles of Recovery</i> by Professor Keith Humphreys  <a href="http://assets.cambridge.org/97805217/92776/frontmatter/9780521792776_frontmatter.pdf">http://assets.cambridge.org/97805217/92776/frontmatter/9780521792776_frontmatter.pdf</a></li> <li>• 8.1 refers to structured psychological interventions used as a standalone or in conjunction with pharmacological treatment. It should say that they are also used in conjunction with group and peer-support based models to ensure that the</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>client may benefit from both individual attention and as a participant in a group experience. The group becomes an ongoing personal resource.</p> <ul style="list-style-type: none"> <li>• Interpersonal group therapy (as per Yalom) is critical to clients understanding themselves and the way they relate to others, a key to relapse prevention.</li> <li>• The chapter fails to recognise the treatment journey as such, which might involve progress/regress and that all opportunities allowing access to programmes facilitating active recovery should be available and accessible. There should be no rigid prescription of the journey.</li> <li>• Life-saving research and evidence was excluded and incorrect conclusions disseminated, perhaps because it was overseen by people without experience in getting addicts alcohol/drug-free. Throughout the NICE Psychosocial guidelines for drugs is the authors' underlying inclination to manage from a position of low expectation rather than from a position of encouragement and optimism – it reads as if written by people with no track record in successful drug-free outcomes.</li> <li>• “User groups” have consistently tended to be a term used to denote those maintained on prescriptions – eg, members of the</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>[Methadone] Alliance – including representation on the Board of the NTA and has tended to exclude those who are living examples of abstinent (drug free) recovery. The voice of recovery should become normalised and not made to seem eccentric.</p> <ul style="list-style-type: none"> <li>• In the context of withdrawal and critical part of the recovery journey, reference should be made to the psychological withdrawal which brings prior to, continues through and after the process of physical withdrawal (detoxification).</li> <li>• Motivational enhancement has a part to play in helping clients through the inevitable ambivalence about giving up and changing a lifestyle</li> <li>• 8.6.7.2 Should not only say “consider facilitating...” But should “proactively facilitate initial contact with the groups or people who are currently benefitting from them</li> <li>• NTA ‘expert’ groups on patient placement criteria are discussing these flawed NICE Psychosocial Guidelines – by adopting them, they will create a domino effect of fatal errors.</li> <li>• If Chapter 8 is not corrected, the UK <i>Drug Strategy 2010</i> will fail. Chapter 8 of the document at <a href="http://www.nice.org.uk/CG51">www.nice.org.uk/CG51</a> must</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>be corrected/amended to save lives and money.</p> <p>References to the National Treatment Agency are at best outdated; it has been abolished.</p>		
Pierpoint Addiction Treatment Centres	No	<ul style="list-style-type: none"> <li>Only 2% of people in the so-called treatment system are enabled to get drug free.</li> </ul> <p>This because the original document is life-threateningly flawed and must be AMENDED not merely updated/reviewed. In particular, Chapter 8 on Psychological Interventions omits 12-Step Facilitation which has been proven to yield the most clinically effective as well as cost effective service.</p> <p>8.6.5 refers to “intensive referral” and links to 12-Step-based treatment programmes but it does not discuss the proven technique of 12 Step facilitation. Below is a list of only some errors.</p> <ul style="list-style-type: none"> <li>Clause 1.5.1.2 states that addicts who have had community-based psychosocial treatment cannot be referred to abstinent rehabs – thus fatally blocking continuum of care and sacrificing the principle of “first do no harm”. This clause has led to such incidents as patients being admitted to rehab after years on methadone and being found to have, despite reports saying no physical problems, broken clavicle and limbs, a stroke and vomiting blood</li> </ul>	<p>The Guideline Development Group Members drew up the original – but, bar perhaps one or two – do NOT know how to get addicts drug free. It must be rewritten by those who do have this proven knowledge and experience, and the development group membership must be appropriate this time round in order to do so, headed up not by prescribers but those who have a track record in getting people off drugs and into rewarding lifestyles.</p> <p>Due to the fatal errors and omissions in the first version of the Psychosocial Guidelines, psychological interventions with a track record of getting people off drugs have been excluded from commissioning and contracts, leading to loss of lives including methadone becoming the second-greatest drug killer in the UK. This preventable loss of lives has led to demoralisation across the</p>	

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p data-bbox="629 220 1196 284"><a href="http://www.addictiontoday.org/addictiontoday/2011/01/successfully-leaving-treatment.html">www.addictiontoday.org/addictiontoday/2011/01/successfully-leaving-treatment.html</a>)</p> <ul data-bbox="584 308 1196 1315" style="list-style-type: none"> <li data-bbox="584 308 1196 746">• Point 1.5.1.2 is erroneous in a related context when it suggests that referrals to residential treatment should be restricted to those who have 2not benefited from previous community based psychosocial treatment”. This contradicts the basis of treatment interventions being 'person centred' and flies in the face of experience which has shown clearly that gains from community-based psychosocial interventions can stabilise patients enough to be admitted to residential rehabilitation, leading to sustainable long-term recovery.</li> <li data-bbox="584 767 1196 962">• In Chapter 8 and elsewhere, there is no mention of the NHS’s own research on how amending existing therapeutic techniques even slightly to entice clients into free after/mutual-aid groups can save money and lives.</li> <li data-bbox="584 983 1196 1315">• It omits mention of the eclectic therapeutic techniques developed by providers of “classic” recovery which can be used by rehabs and community and prison settings to encourage same, to enable addicts to sustain drug-free recovery and all the attendant benefits of rebuilding relationships, gaining work, reducing recidivism and breaking the generational chain of addiction and dysfunctional</li> </ul>	<p data-bbox="1223 220 1637 419">whole spectrum of care in best-practice agencies which are denied the ability to give appropriate care, including NHS and tier 2/3 agencies as well as tier 4.</p>	

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>behaviours.</p> <ul style="list-style-type: none"> <li>• Residential and other treatment are not adequately compared, nor the different diagnoses of clients using residential rather than non-residential.</li> <li>• The current document does not provide a balanced set of guidelines to assist practitioners in delivery treatment focused on recovery. The Guidelines reflect the priorities of research rather than the effectiveness of psychosocial interventions. In particular, they are over weighted in respect of contingency management and poorly weighted in terms of 12-step based recovery. In this latter respect, even Prof John Strang commented: “Worldwide 12 Step Recovery is probably the single most commonly utilised pathway for recovery - both community based and also through specific residential structured 12 Step Recovery Programmes”. This is not reflected in the guidelines which instead rely on research studies on the effectiveness of contingency management while ignoring the experience of the millions who have recovered through a 12 step programme. It is not reasonable to ignore the experience of millions simply because they have not been subjected to selective ' double blind ' research.</li> <li>• Further the guidelines do not fully articulate</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>the benefits of self help groups 12 Step or Smart ( which is not referred to ) to be of any use to practitioners again in contrast to the amount of space devoted to contingency management. This imbalance should be addressed in revised guidelines. The best research on this is collected in <i>Circles of Recovery</i> by Professor Keith Humphreys  <a href="http://assets.cambridge.org/97805217/92776/frontmatter/9780521792776_frontmatter.pdf">http://assets.cambridge.org/97805217/92776/frontmatter/9780521792776_frontmatter.pdf</a></p> <ul style="list-style-type: none"> <li>• 8.1 refers to structured psychological interventions used as a standalone or in conjunction with pharmacological treatment. It should say that they are also used in conjunction with group and peer-support based models to ensure that the client may benefit from both individual attention and as a participant in a group experience. The group becomes an ongoing personal resource.</li> <li>• Interpersonal group therapy (as per Yalom) is critical to clients understanding themselves and the way they relate to others, a key to relapse prevention.</li> <li>• The chapter fails to recognise the treatment journey as such, which might involve progress/regress and that all opportunities allowing access to programmes facilitating active recovery should be available and</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>accessible. There should be no rigid prescription of the journey.</p> <ul style="list-style-type: none"> <li>• Life-saving research and evidence was excluded and incorrect conclusions disseminated, perhaps because it was overseen by people without experience in getting addicts alcohol/drug-free. Throughout the NICE Psychosocial guidelines for drugs is the authors' underlying inclination to manage from a position of low expectation rather than from a position of encouragement and optimism – it reads as if written by people with no track record in successful drug-free outcomes.</li> <li>• “User groups” have consistently tended to be a term used to denote those maintained on prescriptions – eg, members of the [Methadone] Alliance – including representation on the Board of the NTA and has tended to exclude those who are living examples of abstinent (drug free) recovery. The voice of recovery should become normalised and not made to seem eccentric.</li> <li>• In the context of withdrawal and critical part of the recovery journey, reference should be made to the psychological withdrawal which brings prior to, continues through and after the process of physical withdrawal (detoxification).</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<ul style="list-style-type: none"> <li>Motivational enhancement has a part to play in helping clients through the inevitable ambivalence about giving up and changing a lifestyle</li> <li>8.6.7.2 Should not only say “consider facilitating...” But should “proactively facilitate initial contact with the groups or people who are currently benefitting from them</li> <li>NTA ‘expert’ groups on patient placement criteria are discussing these flawed NICE Psychosocial Guidelines – by adopting them, they will create a domino effect of fatal errors.</li> <li>If Chapter 8 is not corrected, the UK <i>Drug Strategy 2010</i> will fail. Chapter 8 of the document at <a href="http://www.nice.org.uk/CG51">www.nice.org.uk/CG51</a> must be corrected/amended to save lives and money.</li> </ul> <p>References to the National Treatment Agency are at best outdated; it has been abolished.</p>		
Royal College of Nursing	YES			
Broadreach House	NO The original document is life-threateningly flawed and	<ul style="list-style-type: none"> <li>Only 2% of people in the so-called treatment system are enabled to get drug free.</li> </ul> <p>This because the original document is life-threateningly flawed and must be AMENDED not merely updated/reviewed. In particular,</p>	The Guideline Development Group Members drew up the original – but, bar perhaps one or two – do NOT know how to get addicts drug free. It must be	

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
	must be reviewed; if nothing else, review chapter 8 & 1.5.1.2.	<p>Chapter 8 on Psychological Interventions omits 12-Step Facilitation which has been proven to yield the most clinically effective as well as cost effective service.</p> <p>8.6.5 refers to “intensive referral” and links to 12-Step-based treatment programmes but it does not discuss the proven technique of 12 Step facilitation. Below is a list of only some errors.</p> <ul style="list-style-type: none"> <li>• Clause 1.5.1.2 states that addicts who have had community-based psychosocial treatment cannot be referred to abstinent rehabs – thus fatally blocking continuum of care and sacrificing the principle of “first do no harm”. This clause has led to such incidents as patients being admitted to rehab after years on methadone and being found to have, despite reports saying no physical problems, broken clavicle and limbs, a stroke and vomiting blood (<a href="http://www.addictiontoday.org/addictiontoday/2011/01/successfully-leaving-treatment.html">www.addictiontoday.org/addictiontoday/2011/01/successfully-leaving-treatment.html</a>)</li> <li>• Point 1.5.1.2 is erroneous in a related context when it suggests that referrals to residential treatment should be restricted to those who have not benefited from previous community based psychosocial treatment”. This contradicts the basis of treatment interventions being 'person centred' and flies in the face of experience which has shown clearly that gains from</li> </ul>	<p>rewritten by those who do have this proven knowledge and experience, and the development group membership must be appropriate this time round in order to do so, headed up not by prescribers but those who have a track record in getting people off drugs and into rewarding lifestyles.</p> <p>Due to the fatal errors and omissions in the first version of the Psychosocial Guidelines, psychological interventions with a track record of getting people off drugs have been excluded from commissioning and contracts, leading to loss of lives including methadone becoming the second-greatest drug killer in the UK. This preventable loss of lives has led to demoralisation across the whole spectrum of care in best-practice agencies which are denied the ability to give appropriate care, including NHS and tier 2/3 agencies as well as tier 4.</p>	

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>community-based psychosocial interventions can stabilise patients enough to be admitted to residential rehabilitation, leading to sustainable long-term recovery.</p> <ul style="list-style-type: none"> <li>• In Chapter 8 and elsewhere, there is no mention of the NHS's own research on how amending existing therapeutic techniques even slightly to entice clients into free after/mutual-aid groups can save money and lives.</li> <li>• It omits mention of the eclectic therapeutic techniques developed by providers of "classic" recovery which can be used by rehabs and community and prison settings to encourage same, to enable addicts to sustain drug-free recovery and all the attendant benefits of rebuilding relationships, gaining work, reducing recidivism and breaking the generational chain of addiction and dysfunctional behaviours.</li> <li>• Residential and other treatment are not adequately compared, nor the different diagnoses of clients using residential rather than non-residential.</li> <li>• The current document does not provide a balanced set of guidelines to assist practitioners in delivery treatment focused on recovery. The Guidelines reflect the priorities of research rather than the effectiveness of psychosocial interventions.</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>In particular, they are over weighted in respect of contingency management and poorly weighted in terms of 12-step based recovery. In this latter respect, even Prof John Strang commented: “Worldwide 12 Step Recovery is probably the single most commonly utilised pathway for recovery - both community based and also through specific residential structured 12 Step Recovery Programmes”. This is not reflected in the guidelines which instead rely on research studies on the effectiveness of contingency management while ignoring the experience of the millions who have recovered through a 12 step programme. It is not reasonable to ignore the experience of millions simply because they have not been subjected to selective ' double blind ' research.</p> <ul style="list-style-type: none"> <li>• Further the guidelines do not fully articulate the benefits of self help groups 12 Step or Smart ( which is not referred to ) to be of any use to practitioners again in contrast to the amount of space devoted to contingency management. This imbalance should be addressed in revised guidelines. The best research on this is collected in <i>Circles of Recovery</i> by Professor Keith Humphreys  <a href="http://assets.cambridge.org/97805217/92776/frontmatter/9780521792776_frontmatter.pdf">http://assets.cambridge.org/97805217/92776/frontmatter/9780521792776_frontmatter.pdf</a></li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<ul style="list-style-type: none"> <li>• 8.1 refers to structured psychological interventions used as a standalone or in conjunction with pharmacological treatment. It should say that they are also used in conjunction with group and peer-support based models to ensure that the client may benefit from both individual attention and as a participant in a group experience. The group becomes an ongoing personal resource.</li> <li>• Interpersonal group therapy (as per Yalom) is critical to clients understanding themselves and the way they relate to others, a key to relapse prevention.</li> <li>• The chapter fails to recognise the treatment journey as such, which might involve progress/regress and that all opportunities allowing access to programmes facilitating active recovery should be available and accessible. There should be no rigid prescription of the journey.</li> <li>• Life-saving research and evidence was excluded and incorrect conclusions disseminated, perhaps because it was overseen by people without experience in getting addicts alcohol/drug-free. Throughout the NICE Psychosocial guidelines for drugs is the authors' underlying inclination to manage from a position of low expectation rather than from a position of encouragement and optimism</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>– it reads as if written by people with no track record in successful drug-free outcomes.</p> <ul style="list-style-type: none"> <li>• “User groups” have consistently tended to be a term used to denote those maintained on prescriptions – eg, members of the [Methadone] Alliance – including representation on the Board of the NTA and has tended to exclude those who are living examples of abstinent (drug free) recovery. The voice of recovery should become normalised and not made to seem eccentric.</li> <li>• In the context of withdrawal and critical part of the recovery journey, reference should be made to the psychological withdrawal which brings prior to, continues through and after the process of physical withdrawal (detoxification).</li> <li>• Motivational enhancement has a part to play in helping clients through the inevitable ambivalence about giving up and changing a lifestyle</li> <li>• 8.6.7.2 Should not only say “consider facilitating...” But should “proactively facilitate initial contact with the groups or people who are currently benefitting from them</li> <li>• NTA ‘expert’ groups on patient placement criteria are discussing these flawed NICE</li> </ul>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>Psychosocial Guidelines – by adopting them, they will create a domino effect of fatal errors.</p> <ul style="list-style-type: none"> <li>If Chapter 8 is not corrected, the UK <i>Drug Strategy 2010</i> will fail. Chapter 8 of the document at <a href="http://www.nice.org.uk/CG51">www.nice.org.uk/CG51</a> must be corrected/amended to save lives and money.</li> </ul> <p>References to the National Treatment Agency are at best outdated; it has been abolished.</p>		
Association for Family Therapy and Systemic Practice (AFT)	NO	<p>The recommendations for a ‘whole systems’ approach suggests that systemic approaches have a value – and there is considerable evidence for the effectiveness of including families and important relationships in treatments for drug misuse (and for alcohol dependence).</p> <p>Liddle. H., Dakof, G.A. et al (2008): Treating adolescent drug abuse: a randomised trial comparing multidimensional family therapy and cognitive behavioural therapy. <i>Addiction</i>. 103: 1660-1670.</p> <p>Liddle. H. , Rowe, et al (2009): Multidimensional family therapy: A science-based treatment for adolescent drug abuse. In Bray &amp; Stanton (eds): the Wiley-</p>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>Blackwell handbook of family psychology. Wiley-Blackwell. Malden (pp341-354.)  Robbins, M.S., Szapocznik, J. et al (2008):  The efficacy of structural ecosystems therapy with drug-abusing/dependent African American and Hispanic American Adolescents. Journal of Family Psychology. 22 (1), 51.</p> <p>It may also be useful to see Stratton, P.(2010): '<i>The evidence base of systemic family and couples therapies</i>' Association for Family Therapy, UK. <a href="http://www.aft.org.uk">www.aft.org.uk</a> .  The website includes: Stratton, P., Silver, E., Nascimento, N., Powell, G., McDonnell, L. and Novotny, E. : Review of family, couples and systemic therapy outcome research 2000-2009.  see Adult substance misuse pp12-25;  Children and adolescence Substance misuse pp 58-65.</p>		
Centre for Policy Studies Prisons and Addictions Forum	NO	They do not constitute a balanced set of guidelines to assist practitioners in delivering treatment focused on recovery. Nor do they reflect the overall research evidence base on the variable effectiveness of different drug treatment interventions and settings over time. Randomised Control Trials, as Sir Michael Rawlins has pointed out, "are often carried out on specific types of patients for a relatively	There appears to be no review of the significant US evidence base regarding the efficacy of therapeutic communities, settings and fellowships (De Leon) The guidelines do not articulate the known scientific evidence base for the efficacy of 12 step or AA fellowship groups for alcohol	Clause 1.5.1.2 states that addicts who have had community-based psychosocial treatment cannot be referred to abstinence rehabs – thus fatally blocking a possible treatment continuum. It is

**PLEASE NOTE: Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.**

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>short period of time, whereas in clinical practice the treatment will be used on a much greater variety of patients - often suffering from other medical conditions - and for much longer. There is a presumption that, in general, the benefits shown in an RCT can be extrapolated to a wide population; <i>but there is abundant evidence to show that the harmfulness of an intervention is often missed in RCTs</i>.<sup>i</sup> Contingency management, is a case in point. The trials are of short duration. Over a longer term this intervention might be seen as counter intuitive to the diagnosis of addiction, as it involves an element of bribe as opposed to setting clear non negotiable rules of engagement. It is notable that Sir Michael has also said that <i>observational studies</i> can provide an important source of evidence about both the benefits and harms of therapeutic interventions. Yet in such sources <b>have not been drawn on</b> to guide treatment decisions or treatment appropriateness. The two key UK observational studies, NTORS and DORIS, both show, and DORIS, startlingly so, improved clinical and other 'recovery' outcomes for those assigned to residential rehab treatment settings.<sup>ii</sup> Clinicians deserve to be guided by the knowledge that the DORIS survey (findings at 36 months) found that 29.4 per cent of those who went through rehab had a 90-day drug-free period compared with 6.4% on methadone. The emphasis on contingency management in the absence of longer terms</p>	<p>recovery – a clear model for drug recovery,( Keith Humphreys et al). Yet lead addiction psychiatrists like Owen Bowden Jones point out that the majority of clients have both alcohol and drug problems or swing between the two. It is likely therefore that alcohol evidence is highly pertinent and could inform drug treatment. The American epidemiological evidence is clear – it through such peer support programmes that the majority of people historically have recovered (see Addiction a Disorder of Choice, Gene Heyman) yet this is not mentioned.</p>	<p>astonishing and nothing less than saying to a cancer patient who has had the benefit of radio therapy that they are ineligible for chemotherapy</p> <p>The limitations of the NICE research base i.e. range, the quantity and quality of research drawn on is disenfranchising in itself. The use of the term ' Guidelines ' is misleading as they effectively curtail some interventions in favour of others and needs to be replaced by ' Limited evidence of effectiveness' or 'A review of limited and incomplete research findings.' To do otherwise is to ignore the experience of millions of people who have recovered from drug misuse from various interventions, notably, but not only, 12 Step Recovery, which have</p>

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>outcomes is surprising.</p> <p>The guidelines also fail to draw on the evidence base regarding the benefits of abstinence which both clinicians and treatment clients need to inform their decisions and choices.</p> <p>These findings, again from DORIS are clear: “on the basis of a range of key outcome measures: arrested over the last 17 months, having committed any crime and any acquisitive crime over the last 17 months, having been in employment and education over the last 17 months, self-reported health over the last 17 months, attempted suicide/self-harm over the last 17 months) it is evident that those drug users who reported a 90-day period of abstinence were fairing better than those who were continuing in their drug use, were more likely to have been on an educational course or in employment; less likely to have attempted suicide or self-harmed; less likely to have been arrested; less likely to be drinking excessively; less likely to have committed a crime or an acquisitive crime; and more likely to rate their health as much better or somewhat better. All of these associations were statistically significant at the 5% level.</p> <p>These results taken at 36 months after treatment recruitment correlated with residential rehabilitation.</p> <p>They believe the current guidelines which state that referrals to residential treatment should be restricted to those who have ' not benefited</p>		<p>not been subjected to a limited duration RCT research project. The danger of discrimination and of even causing harm by relying on short term research and ( in the absence of longitudinal evidence) of over generalising from it is exemplified by the recently published Edinburgh longitudinal methadone research (Kimber et al, BMJ July 2010)</p>

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>from previous community based psychosocial treatment.' There is no evidence to support this conclusion. It is erroneous and misleading in the context of the current knowledge base.</p> <p>There is also an urgent need to review the psycho social guidelines regarding the relative efficacy of psycho social discrete interventions such as cognitive behaviour therapy and contingency management and psycho social 'settings'. Do they working in real life as well as` in experimental settings. Are they a waste of money? .There seems to have been little attempt to explore evidence of recovered addicts assessments of what interventions most helped their recovery. Dr David Best's research concluded that rehab was the only intervention regarded as helpful or contributing to recovery (published in Addiction Today)</p> <p>Also ignored is that person centred or a holistic approaches to recovery in real life are often incompatible with the operation of community drug services where both continuity and contact is sparse and where the client is typically moved between different services in relation to the different dimensions of his problem – one for BBV testing, another for script collection , and another for counselling (if he or she is lucky). This is before negotiating other heath, education or housing support services. The good rehab supports client personally through all these `hurdles' as well</p>		

**PLEASE NOTE:** Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.

Stakeholder	Agree?	Comments	Comments on areas excluded from original scope	Comments on equality issues
		<p>as providing a 24/7 availability.</p> <p>i)Rcplondon.ac.uk [Internet]. Royal College of Physicians: Sir Michael Rawlins attacks traditional ways of assessing evidence. [updated 2008 Oct 16; cited 2011 Jan 27] Available from <a href="http://pressrelease.rcplondon.ac.uk/Archive/2008/Attack-on-traditional-ways-of-assessing-the-evidence-of-therapeutic-interventions">http://pressrelease.rcplondon.ac.uk/Archive/2008/Attack-on-traditional-ways-of-assessing-the-evidence-of-therapeutic-interventions</a></p> <p>iii)McKeganey N. Abstinence and drug abuse treatment: Results from the Drug Outcome Research in Scotland study. <i>Drugs: Education, Prevention and Policy</i>, 2006;13(6)</p> <p>-----</p> <p>-----</p>		

organisations were approached but did not respond:

- ADAPT (Alcohol and Drug Addiction Prevention & Treatment)
- Addaction
- Adfam
- Adults Strategy and Commissioning Unit
- Alliance, The
- Altrix Healthcare plc
- Amber Valley PCT
- Anglesey Local Health Board
- Association for Cognitive Analytic (ACAT) Therapy
- Association For Family Therapy and Systemic Practice in the UK (AFT)
- Association for Psychoanalytic Psychotherapy in the NHS (APP)

**PLEASE NOTE: Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.**

Association of Child Psychotherapists  
Association of Clinical Biochemists, The  
Association of Dance Movement Psychotherapy UK  
Association of Directors of Adult Social Services (ADASS)  
Association of Psychoanalytic Psychotherapy in the NHS  
Association of the British Pharmaceuticals Industry (ABPI)  
Association of Therapeutic Communities  
Avon and Wiltshire Mental Health Partnership NHS Trust  
Avon and Wiltshire MHP NHS Trust  
Barnsley PCT  
Barton Surgery  
Birmingham Drug Action Team  
BMJ  
Bradford & Airedale PCT  
Brent PCT  
Brighton Oasis Project  
Britannia Pharmaceuticals Limited  
British and Irish Orthoptic Society  
  
British Association for Behavioural & Cognitive Psychotherapies (BABCP)  
  
British Association for Counselling and Psychotherapy  
British Association of Art Therapists  
British Association of Drama Therapists  
British Geriatrics Society  
British Maternal and Fetal Medicine Society (BMFMS)  
British National Formulary (BNF)  
British Psychological Society, The  
Calderdale PCT  
Camden and Islington Mental Health and Social Care Trust  
Care Quality Commission (CQC)  
Chatham House  
City and Hackney Teaching PCT  
Clouds  
  
College of Emergency Medicine

**PLEASE NOTE: Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.**

College of Mental Health Pharmacy  
College of Occupational Therapists  
Community Practitioners and Health Visitors Association  
Compass  
Connecting for Health  
Co-operative Pharmacy Association  
Cornwall Acute Trust  
Cotswold and Vale PCT  
CRISIS  
Cyrenians  
David Lewis Centre, The  
Department for Communities and Local Government  
Department for Work and Pensions  
Department of Community Health Sciences  
Department of Health  
Department of Health Advisory Committee on Antimicrobial Resistance  
and Healthcare Associated Infection (ARHAI)  
Det Norske Veritas - NHSLA Schemes  
Devon PCT  
DrugScope  
European Association for the Treatment of Addiction  
Faculty of Forensic and Legal Medicine  
Faculty of Public Health  
Federation of Drug & Alcohol Professionals (FDAP)  
First Person Plural  
Flintshire County Council  
Food for the Brain Foundation  
Forensic Arts Therapies Advisory Group  
Fremantle Hospital  
Gloucestershire Partnership NHS Trust  
Greater Manchester West Mental Health NHS Foundation Trust  
  
Hampshire Partnership NHS Foundation Trust  
  
Hayward Medical Communications

**PLEASE NOTE: Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.**

Health and Safety Executive  
Hertfordshire Partnership NHS Trust  
Home Office  
Howard League for Penal Reform, The  
Human Givens Institute  
Humber NHS Foundation Trust  
Janssen  
Kent & Medway NHS and Social Care Partnership Trust  
Lancashire Care NHS Foundation Trust  
Leicestershire Community Project Trust  
Lifeline  
Liverpool PCT  
London School of Hygiene and Tropical Medicine  
Medicines and Healthcare Products Regulatory Agency (MHRA)  
Mencap  
Mental Health Nurses Association  
Merck Sharp & Dohme (Formerly Schering-Plough Ltd)  
Mersey Care NHS Trust  
Milton Keynes PCT  
Ministry of Defence (MoD)  
Napp Pharmaceuticals  
National Addiction Centre  
National AIDS Trust (NAT)  
National CAMHS Support Service  
National Children's Bureau (NCB)  
National Drug Prevention Alliance  
National Forum of Consultant Nurses: DRUGS ALCOHOL & MENTAL HEALTH  
National Institute for Mental Health in England (NIMHE)  
National Offender Management Service  
National Patient Safety Agency (NPSA)  
National Public Health Service for Wales  
National Treatment Agency for Substance Misuse

**PLEASE NOTE: Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.**

National Youth Advocacy Service  
Newcastle PCT  
NHS Bedfordshire  
NHS Clinical Knowledge Summaries Service (SCHIN)  
NHS Plus  
NHS Quality Improvement Scotland  
NHS Sheffield  
NHS Western Cheshire  
Niger Delta University  
North East Council of Addictions  
North Staffordshire Combined Healthcare NHS Trust  
North Yorkshire and York PCT  
Nottingham City PCT  
Nottinghamshire Acute Trust  
Obesity Management Association  
Outcome Consultancy  
Oxfordshire & Buckinghamshire Mental Health Partnership NHS Trust  
Oxleas NHS FoundationTrust  
P.M.S (Instruments) Ltd  
PAPYRUS (Prevention of Suicides)  
Paracetamol Information Centre  
PERIGON Healthcare Ltd  
Pfizer Limited  
Phoenix Futures  
Pierpoint Addiction Treatment Centres  
Prison Reform Trust  
PROMIS Recovery Centre  
Reckitt Benckiser Healthcare (UK) Ltd  
Rehabilitation of Addicted Prisoners Trust  
Release  
Rethink  
Rethink - Accommodation Plus  
Rotherham NHS Foundation Trust  
Royal College of Anaesthetists  
Royal College of General Practitioners Wales

**PLEASE NOTE: Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.**

Royal College of Midwives

Royal College of Obstetricians and Gynaecologists

Royal College of Paediatrics and Child Health

Royal College of Pathologists

Royal College of Physicians London

Royal College of Radiologists

Royal College of Surgeons of England

Royal Pharmaceutical Society of Great Britain

Safeline

Samaritans

Sandwell & West Birmingham Hospitals NHS Trust

SANE

Scottish Intercollegiate Guidelines Network (SIGN)

Sheffield Children's NHS Foundation Trust

Sheffield PCT

Social Care Institute for Excellence (SCIE)

Society for Academic Primary Care

Solent Healthcare

Solve It

South Essex Partnership NHS Foundation Trust

South West Yorkshire Partnership NHS Foundation Trust

Southampton City Council

Specialist Clinical Addiction Network (SCAN)

St Andrew's Healthcare

St James Priory Project

St Mungos

Staffordshire Moorlands PCT

Stockport PCT

Substance Misuse Management in General Practice (SMMPG)

Surrey and Border Partnership Trust

Sussex Partnership NHS Foundation Trust

Tees Esk & Wear Valleys NHS Trust

**PLEASE NOTE: Comments received in the course of consultations carried out by the Institute are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that the Institute has received, and are not endorsed by the Institute, its officers or advisory committees.**

The British Psychological Society  
The Methadone Alliance  
The National Pharmaceutical Association  
The Neurological Alliance  
The Royal Society of Medicine  
The Sainsbury Centre for Mental Health  
The South Asian Health Foundation  
Trafford Primary Care Trust  
UK Harm Reduction Alliance  
UK Specialised Services Public Health Network  
Unite / Mental Health Nurses Association  
University College London Hospitals (UCLH) Acute Trust  
University of North Durham  
University of York  
Walsall PCT  
Welsh Assembly Government  
Welsh Scientific Advisory Committee (WSAC)  
West London Mental Health NHS Trust  
Western Cheshire Primary Care Trust  
  
Western Counselling  
  
York Teaching Hospital NHS Foundation Trust  
Young People's Unit

---

<sup>i</sup> Rcplondon.ac.uk [Internet]. Royal College of Physicians: Sir Michael Rawlins attacks traditional ways of assessing evidence. [updated 2008 Oct 16; cited 2011 Jan 27] Available from <http://pressrelease.rcplondon.ac.uk/Archive/2008/Attack-on-traditional-ways-of-assessing-the-evidence-of-therapeutic-interventions>

---

<sup>ii</sup> McKeganey N. Abstinence and drug abuse treatment: Results from the Drug Outcome Research in Scotland study. *Drugs: Education, Prevention and Policy*, 2006;13(6)