October 31, 2022

Mitchell Berger, Public Health Advisor
Maggie Jarry, Emergency Management Specialist
Substance Abuse and Mental Health Services Administration
5600 Fishers Lane
Rockville, MD 20857

RE: Request for Information: SAMHSA’s Role in Climate Change

Dear Mr. Berger and Ms. Jarry,

The American Psychological Association (APA) appreciates the opportunity to comment on SAMHSA’s efforts confronting the impacts of climate change. This request is an important step towards ensuring that stakeholders across disciplines are engaged in future efforts to combat and respond to climate change and its effects on behavioral health and well-being.

APA is the largest scientific and professional organization representing psychology in the U.S., numbering over 133,000 researchers, educators, clinicians, consultants, and students. Psychologists have roles to play in helping society to mitigate climate change and adapt to it, as well as in building public understanding and attitudes and encouraging social action. Psychological science can also contribute to policy development and decision-making about climate change to facilitate acceptance and adoption of new technologies, environments, and routines. Efforts to improve public understanding about climate change, influence attitudes about climate-related behavior and policies, and implement successful social action to advance new societal patterns and policies can also gain much from psychological science.

Over the past decade, the APA Council of Representatives has passed two resolutions calling on psychologists and the association to respond to the growing threat of climate change, which is one of the most complex and important issues facing our society today. This year, the APA Climate Change Task Force developed an action plan to invite the breadth of psychologists, from researchers, clinicians, educators and applied psychologists to address climate change in their work. The Task Force report also called for the association to engage in sustained advocacy on climate change across the levels of government and to further partner with stakeholders in the private sector.

In keeping with the goals of APA in contributing the voice of psychological science in the efforts to combat and respond to climate change, we offer the following suggestions and insights in response to the agency’s request:

A. What should SAMHSA's top priorities be with respect to climate change and behavioral health? What are current strengths or gaps in SAMHSA's work in this area?
   a. In consideration of the SAMHSA strategic plan, the mission and direction for the agency going forward must be adapted to include a focus on climate change. Furthermore, this must continue to be done from the perspective of addressing systemic and structural racism’s impacts on agency. Given substance use disorders are greatly impacted by systemic and structural racism, there is an intersection with the climate crisis’s origins beginning in
inequity and structural racism’s foundations in US Chattel Slavery. Communities such as the Black American community, are and will continue to be adversely impacted by climate change due to the lack of addressing the impact of the US institutions of chattel slavery.

“Individuals’ capacities to mitigate disaster risk are shaped by policies and decisions made by those in power at the community, state, and federal levels. Meanwhile, the stress of various climate fueled events adds to the already existing stresses of racism and poverty, in turn potentially exacerbating the prevalence and intensity of mental health and substance use concerns. SAMHSA and various other federal, state, and local agencies must develop community partnerships and collaborations with leading collectives in its efforts to mitigate and adapt to the impacts of climate change on US populations, and specifically populations on the frontlines of climate impacts such as Black Americans.

b. SAMHSA should do more to raise the profile of the role of behavioral health in mitigating and adapting to climate change. Psychological science can help individuals, communities, and nations mitigate and adapt to climate change in many ways including:

i. Educating and communicating with the public about climate change;

1. Psychology tells us how to effectively educate and communicate with the public about climate change. Using psychologically informed communication methods helps to increase uptake of information.

a. Information about climate change must be clear and straightforward, repeatedly delivered by trusted messengers, and discussed within communities in order to speak to personal needs and realities.

Provision of outreach must focus on normalization of climate information and the impacts of climate change on mental health. With specific focus on the areas of adaption and mitigation, with heavier outreach in frontline communities.

b. We must stress actionable, relevant solutions that foster efficacy and empowerment.

c. We must draw on people’s need to belong in order to create a shared vision for action and a set of social norms that guide behavior.

2. Psychological science identifies many of the drivers of climate skepticism and inaction: Climate change impacts are perceived as distant, uncertain, and

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complex, which can lead to inaction and a desire to uphold established ways of life. Additionally, confronting climate change requires prioritizing long-term well-being over short term costs. Psychological science also offers tools to address these challenges.

ii. Preventing and treating mental health problems stemming from climate change;

1. Psychology tells us how to prevent and treat mental health problems stemming from climate change at individual and community levels. SAMHSA should seek to center this research in action plans aimed at responding to the negative current and future impacts of climate change.

2. Extreme weather events can damage health, homes, and communities, resulting in dire mental health outcomes such as trauma, depression, and anxiety that last long beyond the events that caused them. Climate change can also contribute to long-term economic stress, social instability, and loss of control, all of which undermine psychological well-being. These impacts and stresses hit disadvantaged communities the hardest, exacerbating health disparities and other societal inequalities.

Climate resilience will require anticipating and preparing for such impacts to prevent mental health deterioration around the globe, for example building resilience before disaster strikes and integrating mental health considerations into emergency response efforts.

iii. Enhancing individual and community resilience in the face of natural disasters;

1. SAMHSA has a responsibility to focus on both the individual and community levels of climate change response. A population health frame (discussed below) will be helpful in ensuring that programs are doing the most good for the community, while also improving individual lives. Strategies at the community level include fostering a sense of optimism, bolstering social connections, and incorporating personal items that can preserve or strengthen mental health into emergency preparedness plans (e.g., religious items, toys for small children, favorite foods). Communities should also involve mental health professionals in expanding or strengthening plans for mental health.

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care and support in response to local and regional disasters. Mental health professionals can help with plans to increase social cohesion in the community, such as social programs and infrastructure planning to increase communal parks and other green spaces. Likewise, we recommend that members from the community, including from a diversity of backgrounds, cultures, and abilities, be included in resiliency planning to account for varying needs.

2. In light of our current clinician shortage and mental health crisis, increasing access to services is a continual charge. It is recommended that SAMSHA partner with community leaders and develop collaborative partnerships to tailor programs specifically towards communities at the forefront of climate concerns. Partners such as ADOS Advocacy Foundation for example.

3. Rural areas of the U.S., tracts with larger shares of residents employed in agriculture and forestry, and areas with higher poverty rates and larger shares of older adults are at higher than average flood risk resulting from climate change. U.S. agricultural workers are 20 times likelier to die from illness related to heat stress than civilian workers overall, and climate change is likely to double crop workers’ heat risk by mid-century. SAMHSA should partner with the Department of Agriculture and other federal agencies charged with aiding farmers and rural populations to ensure mental health infrastructure in these areas are hardened against future crises.

iv. Planning for, and adjusting to, migrations and population displacements;
  1. Climate change, including the loss of arable land, can contribute to forced migration and other forms of social and economic instability. This instability can activate people’s need to protect their groups and ideologies, contributing to prejudice, discrimination, and violence and political polarization and radicalization. These effects of climate change have already contributed to wide-scale unrest around the globe. We must understand and address these psychological dynamics in order to prevent further harm, and to ensure the well-being of individuals and groups displaced by disasters related to climate change.

v. Facilitating rapid transitions to new forms of energy, transportation, and agriculture;
  1. There are psychological impacts to the rise and adoption of new technologies. While we understand that these technologies may be essential to efforts to

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fight climate change or adapt to an ever-changing world, these changes can fuel anxiety and mental health challenges. SAMHSA must employ behavioral science to aid government in efforts to mitigate concerns around new climate conscious technologies.

c. Encourage other government agencies to use behavioral health and psychological science when addressing climate change.
   i. While SAMHSA has an important role to play in advancing science and programs within the agency, it also serves an important role as an ambassador of behavioral science to other agencies within the federal, state, and local governments. SAMHSA must lead by example and also create resources to facilitate the use of psychological science by other agencies. The vast breath of government creates numerous opportunities to benefit from psychological science. From the Department of Transportation using psychology to increase adoption of electric vehicles, to the Department of Labor’s focus on flexible work environments for displaced workers, there is benefits to be gleamed from focusing on psychological science.

d. Recognize and highlight the role of air pollutants on mental health
   i. More must be done to learn more and educate people about the impact of air pollutants on mental health. We already know that long-term exposure to air pollutants may be an independent risk factor for mental health disorders ranging from stress to suicidal ideation.\textsuperscript{16} Pollutants may also increase risk of depression and increase needs for emergency psychiatric services.\textsuperscript{17} Exhaust from cars increases exposure to pollutants to those living in urban areas and increases associated health risks. We also understand that climate change will have an impact on air quality now and into the future. This will increase the prevalence of polluted air and increase the possibility for associated mental health ailments. SAMHSA is well positioned to encourage additional research and distribute existing findings on the connection between air pollutants and mental health and should prioritize this work.

B. What should SAMHSA's top priorities be to ensure behavioral health equity with respect to climate change?

a. Psychologists have multiple avenues to advance individual and collective health, well-being, and justice related to climate change. Nearly all subject areas and approaches within psychology offer concepts, methods, and tools that can be applied or elaborated to address the disproportionate impact of environmental burdens, including climate change. As SAMHSA develops an environmental justice strategy, implementing a population health approach should ensure climate change driven mental health and psychosocial concerns are fully addressed through an approach emphasizing prevention and early intervention, engagement within and across diverse systems, and partnerships with key communities and institutions.


stakeholders. Such approaches cultivate population-level capacity for mental wellness and resilience in communities that are often stricken by environmental tragedies.18

A population health approach focuses on improving the health, health equity, safety, and wellbeing of entire populations, including individuals within those populations. This approach is supported by a multidisciplinary science base from psychology as well as sociology, cultural anthropology, medicine, economics, education, and other disciplines. Population health aims to address the cultural, economic, systemic, historical, environmental, and occupational contexts that influence health status, wellbeing, and functioning across the lifespan. Its ultimate goal is equitable human flourishing. The term “population health” may have different connotations in various contexts, but for its own activities, APA recognizes population health as a multi-tiered approach that includes: 1) universal provision of preventative tools and health promotion for all people, families, and communities; 2) monitoring, anticipatory guidance, and early intervention for those with risk factors for physical, mental health, and substance-related conditions; and 3) psychosocial and mental health/substance use care for those experiencing illness and/or escalating physical health and mental distress. Future health security frameworks should be devised using a population health perspective.19

APA affirms that an individual’s health cannot be considered in isolation from the relationships, communities, and societies to which they belong. There are major influencers and social determinants of health outside of the traditional healthcare system that include, but are not limited to, education, work and work setting, environment, legal and regulatory frameworks, income, racism and discrimination of other historically minoritized groups, social connectedness, and stigma; these often exist systemically and structurally, outside of individuals. To advance population health, a biopsychosocial perspective is important across the lifespan, and across the communities and settings where people live, work, learn, and play.

C. Which population(s) are most vulnerable to the behavioral health impact(s) of climate change? How can SAMHSA communicate with such population(s) and others to support their preparedness for the behavioral health impact(s) of climate change?

Climate change impacts us all, but we also know it does not and will not impact us all equally. Research shows us that the impacts of climate change will be felt most by those who are economically disadvantaged, from indigenous and communities of color, children, older adults, individuals with disabilities or pre-existing mental health conditions, or live in rural areas, or are outdoor workers.20 Beyond the individual, APA has found that such disasters and impacted living conditions can also disrupt social groups, households, and communities

through threatening cohesivity and increasing conflicts and population displacement. The mental health impacts associated with climate change include stress, anxiety, depression, mood disorders, PTSD, suicide, neurological complications, cognitive deficits, reduced memory, higher exposure to violence and crime, and higher rates of incarceration. Growing recognition of these issues has led to policy efforts to achieve climate justice, part of the broader movement for environmental justice.

Equitable research approaches and comprehensive data collection are necessary to track public understanding of environmental inequities or their determinants that can inform training programs, communications, and decision-making tools. To achieve accurate data on the impacts of climate change, data must be disaggregated to better understand the specific needs of various communities facing climate impacts. SAMHSA should develop regional and national high-quality, scientific probability-based surveys to collect public understanding of environmental and climate-related inequities and vulnerabilities, their causes, and potential solutions, and the social, psychological, economic, political, and sociocultural bases of these understandings. Surveys must include funding for the development of open data repositories for research use, accessible to both academics and non-academics, and coordination mechanisms among academic researchers across the social and behavioral sciences and with the integration of community partners, in ways that can inform the development of public communications, education, and health advocacy tools to inform public understanding and decision making. Research funding should also highlight investigators from groups historically impacted by institutional practices and policies that have exacerbated disparities. Qualitative and community participatory research, paired with environmental justice grants, are key to assisting communities directly impacted by injustices. Community listening sessions and town halls are needed to facilitate direct community engagements with SAMHSA and gauge research needs in participatory action research. Community-needs assessments represent an essential tool for engagement to foster transparency and collaboration.

SAMHSA must coordinate with other federal agencies to provide opportunities to obtain careers in green jobs for those in environmental justice communities. These roles create mechanisms for community stakeholders to influence policy decisions and gain education and training to engage with harmful policies more effectively. Training solely to ameliorate economic disadvantages is insufficient to compensate for a history of economic and housing disparities experienced by many marginalized communities in disproportionately polluted areas. Land-use and zoning laws regularly create difficult situations for communities to address environmental injustices, which necessitates further advocacy and political education for communities. The healthcare system must create better training models for mental and physical health in order to identify and address the impacts of environmental injustices on patient populations.

SAMHSA should incorporate community participation to evaluate progress and potential success. Measures of performance must rely on the experiences of those impacted by the environmental injustices. Periodic climate surveys related to compliance with policies and procedures outlined in the strategy plan are necessary.

D. In thinking about behavioral health, what are the top lessons learned from past climate-related emergencies and natural disasters, such as recent or past hurricanes, heat waves, wildfires, or other events?

a. Capacity is currently not there to support the demand for mental health care following climate-related emergencies and natural disasters.
   i. Recent examples of climate change related disasters have demonstrated that need for a more robust mental health infrastructure to support demand. An increase in disasters, especially those occurring in highly populated areas, creates a strain on the system. The ability to easily deploy mental health resources to impacted areas will be essential to mitigating long-term mental health harms caused by disasters. Telehealth, multi-state licensing and other reforms are essential to increase the ability of our mental health workforce to easily deploy where services are needed most.
   ii. More must also be done to increase the number of individuals in the pathway to become mental health professionals. We understand that demand for services is increase and will continue to do so, but lack a coherent strategy and dedicated resources to ensure supply meets future demand. Education programs focused on communicating the need and positive community roles of mental health professionals at the high-school and early-college levels, incentives at the local level to hire professionals in this field, and educational assistance to offset the growing cost of post-graduate degrees would all help in ensuring our future workforce keeps pace with future demand.

b. Improving community resilience pre-event will increase the ability of communities to withstand the most negative impacts of climate change.
   i. Strategies for increasing resilience at the community level include fostering a sense of optimism, bolstering social connections, and incorporating personal items that can preserve or strengthen mental health into emergency preparedness plans (e.g.,
religious items, toys for small children, favorite foods). Communities should also involve mental health professionals in expanding or strengthening plans for mental health care and support in response to local and regional disasters. Mental health professionals can help with plans to increase social cohesion in the community, such as social programs and infrastructure planning to increase communal parks and other green spaces. Likewise, we recommend that members from the community, including from a diversity of backgrounds, cultures, and abilities, be included in resiliency planning to account for varying needs.

E. What peer-reviewed articles, papers, toolkits, listservs or other resources related to climate change should SAMHSA highlight in its work with states, local, tribal and territorial health authorities, behavioral health providers, grant recipients, national and local stakeholder organizations, and the general public?

a. [Addressing the Climate Crisis An Action Plan for Psychologists](#) report of the APA Task Force on Climate Change
b. APA/ecoAmerica November 2021 report “[Mental Health and Our Changing Climate: Impacts, Inequities, Responses](#)” and [webinar](#) discussing the report
c. APA Essential Science Conversation - [Climate Change and Mental Health: An Update](#)
d. Episode 79 of “[Speaking of Psychology](#)” podcast with Susan Clayton, PhD

F. Should SAMHSA programs highlight the importance of climate change to its grant recipients? If so, how?

a. Yes. SAMHSA should be using all available outlets to raise the profile of climate change, with a specific focus on the mental health impacts. We know that more must be done to plan for the negative impacts of climate change and SAMHSA should alert its grant recipients of this important need. Calls for grant applications should include a focus on this issue, including grant evaluation metrics. Current grant recipients can be informed about future opportunities that might have this as an element.

G. What barriers exist in SAMHSA’s programs or regulations that make it difficult to prepare for, mitigate, respond to or recover from the impacts of climate change on mental health or substance use disorders?

a. One perennial issue related to the ability for us to respond on this issue is funding. More must be done, and more resources must be provided to do it. Preparing, mitigating, responding, and recovering each take unique efforts that require unique resources and funding streams. We support increase appropriations for SAMHSA and encourage more funding to be put behind initiatives that focus on these issues.

b. Another important role that SAMHSA can play in helping to increase the effectiveness of its
programs is to increase the dialogue with the mental health community. Organizations like APA have a wealth of resources and a large community of experts standing by to assist the Agency tackle pressing issues. Other organizations and coalitions also exist with similar competencies. SAMHSA should serve as a convener of these organizations and resources to create an exchange of ideas on this issue.

H. What steps should SAMHSA take to help states, local, tribal and territorial health authorities, grant recipients and stakeholders, behavioral health providers, national and local stakeholder organizations, and the general public address the impacts of climate change and the needs of underserved populations?

a. SAMHSA can promote health equity by establishing direct partnerships with liaisons from environmental justice communities. SAMHSA must explore the sources of the disadvantages in these populations, creating reparative and equitable partnerships that incorporate the history of environmental justice in these populations. Marginalized communities who are engaged in civil conflicts related to problematic legislative statutes that proliferate environmental injustices, must receive greater support.27

b. SAMHSA should inform health authorities, stakeholders, and the public about the adverse behavioral and cognitive effects of air pollution. Research is increasingly demonstrating that in addition to its dramatic impacts on human mortality and its effect on our climate, air pollution is associated with adverse impacts on mental health, well-being, cognition. These adverse impacts include increased risk of depression, anxiety, suicide, cognitive decline, and increased use of psychiatric emergency services.

c. Training and workforce development programs are vital to improve health outcomes for environmental justice communities. For example, SAMHSA can develop and enact more equitable job training programs that focus on offsetting economic disadvantages and unemployment.

i. Healthcare infrastructure policies must also explicitly acknowledge and assess environmental harms impacting a patient’s health. SAMHSA can create interdepartmental procedures for collecting data and reporting compliance issues, within impacted communities.

I. How can SAMHSA support access to behavioral health and climate change resources and supports for future generations?

a. Building accessible and robust outlets and lines of communication aimed at communicating the connection of behavioral health to climate change. SAMHSA has a unique place within government to provide tools to other agencies more focused on education of future generations. By developing programming and offering grants aimed at effective communication of this issue, SAMHSA can aid in the development of a new generation of informed citizens.

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J. How can SAMHSA effectively collaborate with governmental and non-governmental partners to facilitate adaption to current and future climate change impacts?
   a. As the main source of mental health knowledge, expertise, and connections, SAMHSA must serve as an ambassador to other government agencies on how their work can be aided by behavioral health science. As discussed above, SAMHSA has a unique role in government and society. By using the current network of experts, organizations, and government resources, SAMHSA can be a resource center and convener for information on this topic.

K. What research should be prioritized to build the evidence base on how climate change affects mental health and substance use disorder outcomes?
   a. SAMHSA should prioritize research into the disparate impacts of climate change impacts of traditionally marginalized communities. Early research indicates that traditionally minoritized and underserved communities are going to be disproportionally harmed by climate change. As discussed above, there is a serious need to focus on these communities in the future.
   b. A focus on what interventions are most successful in mitigating the behavioral health harms of climate change. Climate change is already impacting communities across our country and our world. There is much to be learned about the response to climate change fueled events. SAMHSA should support grantees seeking to examine responses to these events and determine what responses and programs are successful in mitigating and responding to the more serious impacts.

APA again thanks you for the opportunity to comment on this policy. If APA can be of any further assistance, please contact Scott Barstow, at SBastow@APA.org and Corbin Evans, at CEvans@APA.org.

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