



February 5, 2018

The Honorable Joseph Kennedy
U.S. House of Representatives
434 Cannon House Office Building
Washington, D.C. 20515

Re: The Behavioral Health Coverage Transparency Act of 2018

Dear Representative Kennedy,

The undersigned national mental health and substance use disorder organizations in the Coalition to Stop Opioid Overdose are writing today to express our support for the Behavioral Health Coverage Transparency Act of 2018.

The Coalition to Stop Opioid Overdose (CSOO) is a coalition of diverse organizations representing health care and social service professionals and advocates united around common policy goals that will lead to meaningful and comprehensive policies to reduce opioid overdose deaths through prevention, treatment and recovery support services.

This important act supports CSOO's efforts to increase patients' access to treatment services and to reduce overdose by strengthening parity in mental health and addiction benefits. Specifically, your bill would require issuers to disclose the analysis they perform in making parity determinations; require federal regulators to conduct random audits; and require the federal parity agencies to review denial rates for mental health versus medical claims. Moreover, it would create a central online portal so that people can access all information as a one-stop shop, and submit complaints and violations.

The morbidity and mortality statistics related to addiction, and in particular opioid addiction, are astounding. According to the Centers for Disease Control and Prevention (CDC), drug overdoses are the current leading cause of accidental death in the US, with more than 63,600 lethal drug overdoses in 2016.ⁱ These alarming statistics are driven by a very large treatment gap in this country. Nearly 90% of Americans with addiction do not receive treatment and 80% of individuals with opioid addiction are not treated.^{ii,iii} Those that take the first step towards recovery by seeking treatment often face immense barriers from insurance companies. For example, medications for the treatment of opioid addiction are often subject to onerous utilization management practices by public and private payers, including prior authorization requirements and fail first policies, in addition to requirements for psychosocial services that are not covered by a patient's insurance provider.

Your leadership and attention to ensuring greater oversight and transparency in parity implementation is much appreciated. Strengthening parity protections for people with addiction will have a long-term, positive impact on increasing access to treatment and reducing overdose. The Behavioral Health Coverage Transparency Act details a thoughtful and actionable approach that supports this outcome. The undersigned members of CSOO support the goals of your bill and look forward to working with you to



secure its passage as we continue to advocate for adequate coverage of addiction and mental health treatment to save the lives of those in need of it.

Sincerely,

American College of Osteopathic Emergency Physicians
American Psychiatric Association
American Society of Addiction Medicine
Central City Concern
Facing Addiction With NCADD
National Association of Clinical Nurse Specialists
National Safety Council
Young People in Recovery

ⁱ Hedegaard H, Warner M, Miniño AM. Drug overdose deaths in the United States, 1999–2016. NCHS Data Brief, no 294. Hyattsville, MD: National Center for Health Statistics. 2017.

ⁱⁱ Legal Action Center. (2015). Confronting an Epidemic: The Case for Eliminating Barriers to Medication Assisted Treatment of Heroin and Opioid Addiction. Washington, D.C: Legal Action Center. Available at <http://lac.org/wp-content/uploads/2014/07/LAC-The-Case-for-Eliminating-Barriers-to-Medication-Assisted-Treatment.pdf>

ⁱⁱⁱ Saloner PhD, Karthikeyan MPP. Changes in Substance Abuse Treatment Use Among Individuals with Opioid Use Disorders in the United States, 2004-2013. *The Journal of the American Medical Association*. 2015;314(14):1515-1517