March 25, 2019

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

Re: The Behavioral Health Coverage Transparency Act of 2019

Dear Representative Kennedy,

The undersigned mental health, substance use disorder, and health care professional organizations in the Coalition to Stop Opioid Overdose (CSOO) are writing today to express our support for the Behavioral Health Coverage Transparency Act of 2019.

CSOO is a coalition of diverse organizations united around common policy goals to reduce opioid overdose deaths. Together, CSOO members aim to elevate the national conversation around opioid overdose and work to enact meaningful and comprehensive policy changes that support evidence-based prevention, treatment, harm reduction, and recovery support services.

This important legislation supports the undersigned members’ 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 consumer parity unit and 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. Moreover, those who do 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 Society of Addiction Medicine
A New PATH (Parents for Addiction Treatment & Healing)
Facing Addiction With NCADD
National Board for Certified Counselors
National Safety Council
SMART Recovery
Student Coalition on Addiction
The American Osteopathic Academy of Addiction Medicine
The Kennedy Forum
Treatment Communities of America
Young People in Recovery