

COALITION TO
**STOP OPIOID
OVERDOSE**

May 16, 2022

The Honorable Frank Pallone
United States House of Representatives
Washington, DC 20515

The Honorable Cathy McMorris Rodgers
United States House of Representatives
Washington, DC 20515

The Honorable Patty Murray
United States Senate
Washington, DC 20510

The Honorable Richard Burr
United States Senate
Washington, DC 20510

Dear Chair Murray, Ranking Member Burr, Chairman Pallone and Ranking Member McMorris Rodgers,

The undersigned addiction, mental health, and healthcare professional organizations in the Coalition to Stop Opioid Overdose (CSOO) are writing today to express our strong support for the Parity Implementation Assistance Act (H.R. 3753/S. 1962) and urge the House Energy & Commerce Committee and the Senate Health, Education, Labor and Pensions Committee to consider it at the soonest possible opportunity. Full implementation of the Mental Health Parity and Addiction Equity Act (MHPAEA) is a vital tool in addressing the opioid overdose epidemic at a time when overdose deaths have surged to an unprecedented level.

According to CDC data, overdose deaths reached a disturbing new peak with 100,000 deaths occurring between April of 2020 and April of 2021, and with opioid overdoses accounting for more than 75,000 of those deaths.¹ That means nearly 275 Americans die each day from an overdose, a shocking reality. While it is by no means the only solution, securing insurer compliance with MHPAEA is essential to stemming the tide of increased death and suffering.

State insurance departments have MHPAEA enforcement authority for individual plans and policies sold to employers by insurers. Additionally, there is significant interest in MHPAEA implementation on the part of state insurance departments, as evidenced by the 33 states that participate in the National Association of Insurance Commissioners' MHPAEA Working Group.² In December of 2020, Congress gave states new authority in the Consolidated Appropriations Act (CAA) by empowering them to request comparative analyses from insurers for the purpose of demonstrating MHPAEA compliance. However, most states do not have the resources or expertise necessary to adequately review these complex analyses. Because of this, most have not acted on this request authority as Congress intended when it passed the CAA nearly 17 months ago.

The Parity Implementation Assistance Act would address this problem by providing funding to state insurance departments so they can dedicate the staff time and resources necessary to meaningfully examine comparative analyses requested from insurers. It does this by authorizing \$25 million annually for five years within an existing grant program that previously sent grant funding to state insurance departments for MHPAEA implementation in 2017 and 2018 under the Trump Administration. Without this funding, MHPAEA implementation by state insurance departments will remain stunted and fall short

of what is needed to ensure that insurers are covering substance use disorder treatment in a manner that complies with the law.

We strongly support this legislation and hope that your committees will consider it soon. Without thorough oversight from state insurance departments, individuals and families affected by substance use disorder will never receive the coverage they deserve and are entitled to under the law. This legislation will help states rise to the challenge.

Sincerely,

Addiction Professionals of North Carolina
American Association for the Treatment of Opioid Dependence
American College of Medical Toxicology
American Psychiatric Association
American Society of Addiction Medicine
American Osteopathic Academy of Addiction Medicine
A New PATH (Parents for Addiction Treatment & Healing)
Behavioral Health Association of Providers
CADA of Northwest Louisiana
California Consortium of Addiction Programs & Providers
National Association for Behavioral Healthcare
National Association of Addiction Treatment Providers
SMART Recovery
The Kennedy Forum

¹ Center for Disease Control and Injury Prevention. Drug Overdose Deaths in the U.S. Top 100,000 Annually. Published November 17, 2021. Accessed January 26, 2022.

https://www.cdc.gov/nchs/pressroom/nchs_press_releases/2021/20211117.htm

² Mental Health Parity and Addiction Equity Act (MHPAEA) (B) Working Group of the Regulatory Framework (B) Task Force Membership 2022. National Association of Insurance Commissioners. Accessed May 09, 2022.

https://content.naic.org/sites/default/files/inline-files/2022%20B-MHPAEA%20Working%20Group_3.pdf