

June 26, 2017

The Honorable Mitch McConnell
Majority Leader
United States Senate
S-230 U.S. Capitol
Washington, DC 20510

The Honorable Charles Schumer
Minority Leader
United States Senate
S-221 U.S. Capitol
Washington, DC 20510

Dear Leader McConnell and Leader Schumer,

The undersigned organizations are writing to share our views on critical provisions we believe must be included in any legislation modifying the nation's health care system. We also want to share serious concerns with several of the reforms included in the discussion draft of the *Better Care Reconciliation Act of 2017* (BCRA). We are very concerned that the BCRA's proposed changes to our health care system will result in reductions in health care coverage, particularly for vulnerable populations including those suffering from substance use disorders and mental illness, and we cannot support the bill.

We collectively represent consumers, families, providers, health care and social service professionals, criminal justice professionals, advocates and allied organizations who are committed to meaningful and comprehensive policies to reduce the toll of substance use disorders and mental illness through prevention, treatment and recovery support services.

We appreciate the provision in the BCRA to require coverage of mental health and substance use disorder treatment consistent with the *Mental Health Parity and Addiction Equity Act* (MHPAEA) as part of the new Medicaid Flexibility Program. However, we do not support many of the other changes to the health care system in the discussion draft that would result in reduced access to substance use disorder and mental health treatment, including changes that would cap federal funding for Medicaid, end the Medicaid expansion, and eliminate mental health and substance use disorder benefit protections for Americans insured through the small group and individual markets.

In the face of the opioid overdose and suicide epidemics, equitable access to a full continuum of mental health and substance use disorder treatment services, including medications to treat substance use disorders and mental illness, must be an essential component of health care coverage. It is also critical that substance use disorders and mental illness be covered on par with other medical conditions consistent with MHPAEA.

As the Senate considers the BCRA, we ask that the bill:

- Maintain benefit protections for mental health and substance use disorder treatment and recovery support services through the exchanges and individual/small group markets, and maintain requirements that those benefits be offered at parity with medical benefits
- Maintain Medicaid's current financing structure, including the Medicaid expansion

More than 20 million Americans currently have health care coverage due to the *Affordable Care Act* (ACA), including millions of Americans with substance use disorders and mental illness. This coverage is a critical lifeline for these individuals, many of whom were unable to access effective treatment before the ACA's expansion of Medicaid eligibility to low-income adults, and its requirement that Medicaid expansion plans and plans sold in the individual and small group markets cover substance use disorder and mental health treatment services at parity with medical and surgical services. **As such, we have serious concerns with provisions in the discussion draft that would allow states to easily waive Essential Health Benefit requirements through Section 1332 waivers, end Essential Health Benefit requirements for the Medicaid expansion population, phase out Medicaid expansion and change Medicaid to a per-capita or block grant financing system.**

Additionally, while we appreciate the inclusion of \$2 billion in Fiscal Year 18 for opioid use disorder and mental health treatment and recovery support services, we are concerned that grant funding cannot replace sustainable Medicaid reimbursement. Given that grant funding is subject to the unpredictability of the annual appropriations process, health care providers cannot rely on it to run their practices. Grant funding also requires applications and reporting that fall outside the normal workstream of physician practices, making it impractical for many providers to incorporate it into their business model.

The Medicaid expansion in particular has led to significant increases in coverage and treatment access for persons with substance use disorders and mental illness. In states that expanded Medicaid, the share of people with substance use disorders or mental illness who were hospitalized but uninsured fell from about 20 percent in 2013 to 5 percent by mid-2015, and Medicaid expansion has been associated with an 18.3 percent reduction in the unmet need for substance use disorder treatment services among low-income adults. Rolling back the Medicaid expansion and/or fundamentally changing Medicaid's financing structure to cap spending on health care services will certainly reduce access to evidence-based treatments and reverse much or all progress made on the opioid crisis last year. Moreover, the loss of Medicaid-covered mental health and substance use disorder services for adults would result in more family disruption and out-of-home placements for children, significant trauma which has its own long-term health effects and a further burden on a child welfare system that is struggling to meet the current demand for foster home capacity.

Medicaid funding for mental health and substance use disorder treatment services for low-income populations must be predictable, sustainable, and integrated with financing mechanisms for general medical care to ensure consistent access to treatment and support the long-term development and retention of a substance use disorder and mental health clinician workforce. Capping federal Medicaid funding through per-capita caps or block grants would strain state budgets and likely force states to cut benefits, lower provider reimbursement rates, and/or limit access to care. These changes would be devastating to states grappling with the current opioid overdose and suicide epidemics.

The ACA's Medicaid expansion, Essential Health Benefit requirements for mental health and substance use disorder treatment coverage, and extension of parity protections to the individual and small group market have surely reduced the burden of the opioid misuse and overdose and suicide epidemics and saved lives. As you consider this legislation, we ask that you ensure substance use disorder and mental health treatment benefits continue to be available to Americans enrolled in the individual, small and large group markets as well as Medicaid plans and that these benefits are compliant with the *Mental Health Parity and Addiction Equity Act*.

Finally, throughout this process, we implore you to keep in mind how your decisions will affect the millions of Americans suffering from substance use disorders and mental illness who may lose their health care coverage entirely or see reductions in benefits that impede access to needed treatment.

Sincerely,

1. 10,000 beds
2. Acadia Healthcare
3. Adcare Educational Institute
4. Addiction Education Society
5. Addiction Haven
6. Addiction Resource Council
7. Addiction Services Council
8. Addiction Policy Forum
9. Addiction Treatment Center of New England
10. Addictions Connections Resource
11. Advocates for Recovery Colorado
12. Advocates, Inc.

13. Alabama Society of Addiction Medicine
14. Alano Club of Portland
15. Alcohol & Addictions Resource Center
16. Alcohol/Drug Council of North Carolina
17. Alternatives Unlimited, Inc.
18. Amesbury Psychological Center, Inc.
19. American Academy of Addiction Psychiatry
20. American Correctional Association
21. American Federation of State, County and Municipal, Employees (AFSCME)
22. American Academy of Addiction Psychiatry
23. American Art Therapy Association
24. American Association for Marriage and Family Therapy
25. American Association for the Treatment of Opioid Dependence (AATOD)
26. American Association of Child & Adolescent Psychiatry
27. American Association on Health and Disability
28. American Dance Therapy Association
29. American Foundation for Suicide Prevention
30. American Group Psychotherapy Association
31. American Medical Student Association
32. American Mental Health Counselors Association
33. American Nurses Association
34. American Psychiatric Association
35. American Psychological Association
36. American Society of Addiction Medicine
37. Amida Care
38. A New PATH
39. Anthony's Act
40. Anxiety and Depression Association of America
41. Arc of South Norfolk, The
42. Arise & Flourish
43. Arizona's Children Association
44. Arizona Council of Human Service Providers
45. Arizona Society of Addiction Medicine
46. Arkansas Society of Addiction Medicine
47. Association for Ambulatory Behavioral Healthcare
48. Association for Behavioral Healthcare of Massachusetts
49. Association for Community Human Service Agencies
50. Association of Asian Pacific Community Health Organizations (AAPCHO)
51. Association of Flight Attendants – CWA, AFL-CIO
52. Association of Persons Affected by Addiction (APAA)
53. Association of Recovery Schools
54. Association of Recovery Community Organizations
55. Association of Women's Health, Obstetric and Neonatal Nurses
56. A Stepping Stone to Success
57. Atlantic Prevention Resources, Inc.
58. Avanti Wellness
59. Awakening Recovery
60. BAMSI
61. Bangor Area Recovery Network, Inc.
62. Bay Cove Human Services
63. Bay State Community Services, Inc.
64. Bazelon Center for Mental Health Law
65. Behavioral Health Network, Inc.

66. Better Life in Recovery
67. Bill Wilson Center
68. Boston Alcohol and Substance Abuse Programs, Inc.
69. Boston Healthcare for the Homeless
70. Boston Public Health Commission
71. BreakingTheCycles
72. Bridge of Central Massachusetts, Inc., The
73. Bridgewell
74. Brien Center for Mental Health and Substance Abuse Services, The
75. Brookline Community Mental Health Center
76. Bullhook Community Health Center, Inc.
77. Burke Recovery
78. CADA of Northwest Louisiana
79. California Consortium of Addiction Programs & Professionals
80. California Council of Community Behavioral Health Agencies
81. California Institute for Behavioral Health Solutions
82. California Society of Addiction Medicine
83. Cambridge Health Alliance
84. Camelot Care Centers, Inc.
85. Cape Cod Healthcare Centers for Behavioral Health
86. Capital Area Project Vox
87. Casa Esperanza
88. Casa Pacifica Centers for Children and Families
89. Catholic Charities Family Counseling and Guidance Center
90. Catholic Family Center
91. Center for Human Development
92. Center for Open Recovery
93. Center for Recovery and Wellness Resources
94. Central City Concern
95. Chautauqua Alcoholism and Substance Abuse Council
96. Chicago Recovering Communities Coalition (CRCC)
97. Child & Family Services, Inc.
98. Child and Family Services of New Hampshire
99. Children's Friend, Inc.
100. Children's Home Society of Washington
101. Children's Law Center
102. Children's Services of Roxbury
103. CleanSlate Centers
104. Clergy for a New Drug Policy
105. Clinical and Support Options, Inc.
106. Clinical Social Work Association
107. Coalition of Addiction Students and Professionals Pursuing Advocacy (CASPPA)
108. Colorado Society of Addiction Medicine
109. Community Catalyst
110. Communities for Recovery
111. Community Anti-Drug Coalitions of America (CADCA)
112. Community Counseling of Bristol County, Inc.
113. Community-Minded Enterprises
114. Community Oriented Correctional Health Services (COCHS)
115. Community Services Institute
116. Community Solutions
117. Community Substance Abuse Centers
118. Comrades of Hope

119. Connecticut Community for Addiction Recovery (CCAR)
120. Connecticut Society of Addiction Medicine
121. Counselors Obediently Preventing Substance Abuse (COPS)
122. Cutchins Programs for Children and Families
123. DarJune Recovery Support Services & Café
124. Dash for Recovery
125. Davis Direction Foundation - The Zone
126. DC Fights Back
127. DC Recovery Community Alliance
128. Delphi Behavioral Health Group/MHD
129. Desert Eagle Addiction Recovery
130. Detroit Recovery Project, Inc.
131. Dimock Community Health Center
132. Disability Rights Pennsylvania
133. Doctors for Recovery
134. Dorchester Recovery Initiative
135. Drug and Alcohol Service Providers Organization of Pennsylvania (DASPOP)
136. Drug Policy Alliance
137. Drug Prevention Resources
138. East Bay Agency for Children
139. Easy Does It, Inc.
140. Eating Disorders Coalition
141. Edinburg Center, The
142. Eliot Community Human Services
143. El Paso Alliance
144. Engaged Recovery Community Services
145. Faces and Voices of Recovery
146. Facing Addiction
147. Family Advocates of Georgia, Inc
148. Family Focused Treatment Association
149. Family Service Association
150. Family Service of Greater Boston
151. FAVOR Greenville
152. FAVOR Low Country
153. FAVOR Mississippi Recovery Advocacy Project
154. FAVOR Pee Dee
155. FAVOR Tri-County
156. FED UP! Coalition
157. Fellowship Foundation Recovery Community Organization
158. Fenway Health
159. FHR
160. Florida Society of Addiction Medicine
161. Floridians for Recovery
162. Foundation for Recovery
163. Friends of Recovery - New York
164. FSA – Family Service Agency
165. Futures of Palm Beach
166. G III Associates
167. GAAMHA
168. Gandara Center
169. Georgia Council on Substance Abuse
170. Georgia Society of Addiction Medicine
171. Global Alliance for Behavioral Health and Social Justice

172. Gosnold on Cape Cod
173. Gould Farm
174. Granite Pathways
175. Greater Macomb Project Vox
176. Greater Philadelphia Association for Recovery Education
177. Great South Bay Coalition
178. Greater Cincinnati Recovery Resource Collaborative (GCRRRC)
179. Griffin Recovery Enterprises
180. Harm Reduction Coalition
181. Health Management Group, LTD
182. High Point Treatment Center
183. Hillview Mental Health Center, Inc.
184. HIV Medicine Association
185. Home for Little Wanderers, The
186. Hope2Gather Foundation
187. HOPE for New Hampshire Recovery
188. Hope House Addiction Services
189. Horizon Health Services
190. IC&RC
191. Indivisible St. Louis
192. Illinois Association for Behavioral Health
193. Illinois Association of Rehabilitation Facilities (IARF)
194. Indiana Society of Addiction Medicine
195. International Nurses Society on Addictions
196. Institute for Health and Recovery
197. Iowa Association of Community Providers
198. Iowa Behavioral Health Association
199. Italian Home for Children, Inc.
200. Jackson Area Recovery Community
201. Jewish Family and Children's Services (JF&CS)
202. Joint Coalition on Health
203. Jordan's Hope for Recovery
204. Judge Baker Children's Center
205. Juneau Recovery Community
206. Justice Resource Institute (JRI)
207. Ka Hale Pomaika'i
208. Kentucky Society of Addiction Medicine
209. KEY Program, Inc., The
210. Kyes 2 a 2nd Chance
211. Lahey Health Behavioral Services
212. Lakeshore Foundation
213. Latah Recovery Center
214. Legal Action Center
215. Lifehouse Recovery Connection
216. Lifeline Connections
217. Long Island Council on Alcoholism and Drug Dependence, Inc.
218. Long Island Recovery Association (LIRA)
219. Lost Dreams Awaken Center, Inc.
220. Lotus Peer Recovery/SoberKerrville
221. Lowell Community Health Center, Inc.
222. Lowell House, Inc.
223. LUK, Inc.
224. Madison County Council on Alcoholism & Substance Abuse

225. Magnolia Addiction Support
226. Maine Alliance for Addiction Recovery
227. Mariah's Mission Fund of the Mid-Shor Community Foundation
228. Mark Garwood SHARE Foundation
229. Martha's Vineyard Community Services
230. Maryland-DC Society of Addiction Medicine
231. Maryland House Detox
232. Maryland Recovery Organization Connecting Communities (M-ROCC)
233. Massachusetts Organization for Addiction Recovery (MOAR)
234. Massachusetts Society of Addiction Medicine
235. Maxed Out Drug Prevention
236. McShin Foundation
237. Mental Health Association
238. Message Carriers of Pennsylvania, Inc.
239. Messengers of Recovery Awareness
240. MHA of Greater Lowell
241. Michigan's Children
242. Michigan Recovery Voices
243. Michigan Society of Addiction Medicine
244. Middlesex Human Service Agency, Inc
245. Mid-Michigan Recovery Services, Inc.
246. Midwest Society of Addiction Medicine
247. Mi-HOPE - Michigan Heroin & Opiate Prevention and Education
248. Minnesota Association of Community Mental Health Programs (MACMHP)
249. Minnesota Recovery Connection
250. Minnesota Society of Addiction Medicine
251. Missouri Recovery Network
252. MOBER
253. Mountain View Prevention Services, Inc.
254. NAADAC – the Association for Addiction Professionals
255. National Alliance for Medication-Assisted Recovery (NAMA)
256. National Alliance on Mental Illness
257. National Alliance on Mental Illness – San Mateo County
258. National Alliance to Advance Adolescent Health
259. National Alliance to End Homelessness
260. National Association for Rural Mental Health
261. National Association of Addiction Treatment Providers
262. National Association of Clinical Nurse Specialists
263. National Association of Pediatric Nurse Practitioners
264. National Association of State Mental Health Program Directors (NASMHPD)
265. National Association for Children's Behavioral Health
266. National Association for Rural Mental Health
267. National Association of County Behavioral Health and Developmental Disability Directors
268. National Association of County & City Health Officials
269. National Association of Social Workers (NASW)
270. National Council for Behavioral Health
271. National Center on Addiction and Substance Abuse
272. National Council on Alcoholism and Drug Dependence
273. National Council on Alcoholism and Drug Dependence of E. San Gabriel & Pomona Valleys
274. National Council on Alcoholism and Drug Dependence--Greater Phoenix
275. National Council on Alcoholism and Drug Dependence – Maryland
276. National Council on Alcoholism and Drug Dependence – San Diego
277. National Council on Alcoholism and Drug Dependence of the San Fernando Valley

278. National Council on Alcoholism and Drug Abuse-St. Louis Area
279. National Disability Rights Network
280. National Federation of Families for Children's Mental Health
281. National Health Care for the Homeless Council
282. National League for Nursing
283. National Safety Council
284. National Viral Hepatitis Roundtable
285. Navigate Recovery Gwinnett
286. Nevada Society of Addiction Medicine
287. New Jersey Association of Mental Health and Addiction Agencies, Inc.
288. New Jersey Society of Addiction Medicine
289. New Life Counseling & Wellness Center, Inc.
290. New Mexico Society of Addiction Medicine
291. New York Association of Psychiatric Rehabilitation Services
292. New York Society of Addiction Medicine
293. New York State Council for Behavioral Health
294. NFI Massachusetts, Inc.
295. NMSAS Recovery Center
296. No Health without Mental Health
297. North Charles, Inc.
298. North Cottage Program, Inc.
299. Northeast Center for Youth and Families, The
300. Northern New England Society of Addiction Medicine
301. Northern Ohio Recovery Association (NORA)
302. Northwest Indian Treatment Center
303. North Suffolk Mental Health Association, Inc.
304. Northern Rivers Family Services
305. North Carolina Society of Addiction Medicine (NCSAM)
306. O'Brien House
307. Ohio Society of Addiction Medicine (OHSAM)
308. Oklahoma Citizen Advocates for Recovery & Treatment Association (OCARTA)
309. Old Colony YMCA
310. Open Doorway of Cape Cod
311. Oregon Recovery High School
312. Oregon Society of Addiction Medicine
313. Overcoming Addiction Radio
314. Parity Implementation Coalition
315. Partnership for Drug-Free Kids
316. Partners in Prevention/National Council on Alcoholism and Drug Dependence of Hudson
County, Inc.
317. P.E.E.R Wellness Center, Inc.
318. PEER360 Recovery Alliance
319. Pennsylvania Recovery Organization - Achieving Community Together - (PRO-ACT)
320. Pennsylvania Recovery Organizations Alliance (PRO-A)
321. Pennsylvania Society of Addiction Medicine
322. People Advocating Recovery - PAR
323. Phoenix Houses of New England
324. Phoenix Multisport Boston
325. Pine Street Inn
326. Pivot, Alcohol and Substance Abuse Council of Jefferson County, Inc.
327. PLR Athens
328. Pretrial Justice Institute
329. Prevention Network OCAA

330. Psychiatric Rehabilitation Association
331. Putnam Family & Community Services, Inc.
332. RASE Project
333. REAL- Michigan (Recovery, Education, Advocacy & Leadership)
334. Recover Project/Western MA Training
335. Recovery Allies Of West Michigan
336. RecoveryATX
337. Recovery Café Seattle
338. Recovery Community Foundation of Forsyth
339. Recovery Communities of North Carolina
340. Recovery Community Of Durham
341. Recovery Consultants of Atlanta
342. Recovery Data Solutions
343. Recovery - Friendly Taos County
344. Recovery Idaho, Inc.
345. Recovery is Happening
346. RecoveryNC (Governors Institute on Substance Abuse)
347. Recovery Point at HER Place
348. Recovery Point of Bluefield
349. Recovery Point of Charleston
350. Recovery Point of Huntington
351. Recovery Point of Parkersburg
352. Recovery Point of West Virginia
353. Recover Wyoming
354. reGROUP
355. Rhode Island Communities for Addiction Recovery Efforts (RICAREs)
356. Riverside Community Care
357. Robby's Voice
358. ROCovery Fitness
359. Rockland Council on Alcoholism and Other Drug Dependence, Inc.
360. Sandusky Artisans Recovery Community Center
361. Sandy Hook Promise
362. Serenity Sistas
363. ServiceNet
364. Shatterproof
365. SMART Recovery
366. S.O.A.R™ Yoga (Success Over Addiction and Relapse)
367. Solano Recovery Project
368. Solutions Recovery, Inc.
369. Sonoran Prevention Works
370. South Arkansas Regional Health Center, Inc
371. Sound Community Services, Inc.
372. South Middlesex Opportunity Council, Inc. (SMOC)
373. South Bay Community Services
374. South Carolina Society of Addiction Medicine
375. South Central Human Relations Center
376. South End Community Health Center
377. South Shore Mental Health
378. Southwest Washington Recovery Coalition
379. Spectrum Health Systems, Inc.
380. SpiritWorks Foundation
381. Springfield Recovery Community Center
382. Springs Recovery Connection

383. SSTAR
384. STEP Industries
385. Steppingstone, Incorporated
386. Steve Rummeler Hope Network
387. Student Assistance Services Corp
388. Substance Use and Mental Health Leadership Council of Rhode Island
389. Technical Assistance Collaborative, Inc.
390. Tennessee Society of Addiction Medicine
391. Texas Society of Addiction Medicine
392. The Addict's Parents United (TAP United)
393. The Alliance
394. The Ammon Foundation
395. The Bridge Foundation
396. The Bridge Way School
397. The Campaign for Trauma-Informed Policy and Practice
398. The Chris Atwood Foundation
399. The Council on Alcohol and Drug Abuse
400. The Council on Alcohol & Drug Abuse for Greater New Orleans
401. The DOOR - DeKalb Open Opportunity for Recovery
402. The Global Alliance for Behavioral Health and Social Justice
403. The Kennedy Forum
404. The Ohana Center
405. The Peggie & Paul Shevlin Family Foundation
406. The Recovery Channel
407. The Rest of Your Life
408. The Trevor Project
409. The Village Family Services
410. The Village Project, Inc.
411. There Is No Hero In Heroin Foundation
412. Tia Hart Recovery Community Program
413. T.O.R.C.H Inc.
414. Toward Independent Living and Learning, TILL, Inc.
415. Treatment Communities of America
416. Trilogy Recovery Community
417. True Recovery, LLC
418. Turning Point Center of Central Vermont
419. Two Guys and a Girl
420. UMass Memorial Community Healthlink, Inc.
421. United Methodist Church - General Board of Church and Society
422. Utah Support Advocates for Recovery Awareness (USARA)
423. Valley Hope
424. Veterans Inc.
425. Vermont Council of Developmental and Mental Health Services
426. Vermont Recovery Network
427. Victory Programs, Inc.
428. Vinfen
429. Virginia Association of Recovery Residences
430. Voice for Adoption
431. Voices of Hope for Cecil County
432. Voices of Recovery San Mateo County
433. Volunteers of America of Massachusetts, Inc.
434. WAI-IAM, Inc. and RISE Recovery Community
435. Walker, Inc.

436. Washtenaw Recovery Advocacy Project (WRAP)
437. Washington Federation of State Employees
438. Washington Recovery Alliance
439. Washington Society of Addiction Medicine
440. Watershed Treatment Programs
441. Wayside Youth & Family Support Network
442. WEConnect
443. Wellspring Recovery Services
444. West Virginia Society of Addiction Medicine
445. WholeLife Recovery Community/ Arizona Recovery Coalition
446. Wisconsin Recovery Community Organization (WIRCO)
447. Wisconsin Society of Addiction Medicine
448. Wisconsin Voices for Recovery
449. Wyoming County CARES
450. Yoga of Recovery
451. Young Invincibles
452. Young People in Recovery
453. Young People in Recovery – Los Angeles
454. Youth Opportunities Upheld, Inc.
455. Youth Villages