

October 3, 2017

The Honorable Lamar Alexander
Chairman
Committee on Health, Education, Labor & Pensions
United States Senate
Washington, DC 20510

The Honorable Patty Murray
Ranking Member
Committee on Health, Education, Labor & Pensions
United States Senate
Washington, DC 20510

Dear Senator Alexander and Senator Murray:

The undersigned organizations applaud you both for undertaking bipartisan work on a legislative package to stabilize and strengthen the individual health insurance marketplace.

We collectively represent consumers, families, providers, health care and social service professionals, criminal justice professionals, advocates, and allied organizations that are committed to advancing meaningful and comprehensive policies that reduce the toll of substance use disorders and mental illness through prevention, treatment, and recovery support services. We offer the below recommendations with a unique focus on how specific provisions of your legislation would affect individuals with substance use disorders and mental illness.

As you develop a market stabilization framework, we respectfully ask that benefit protections for mental health and substance use disorder treatment and recovery support services through the exchanges and individual/small group markets be maintained and that those benefits be offered consistent with the Mental Health Parity and Addiction Equity Act (MHPAEA).

We have serious concerns about proposals to loosen the Affordable Care Act's (ACA) Section 1332 waiver requirements and thereby allow states to waive key consumer protections such as the Essential Health Benefit (EHB) requirements. Moreover, if states are allowed to modify benefit design and/or allow flexibility between EHB categories, we request that the legislation state explicitly that a comprehensive addiction and mental health treatment benefit must be maintained and compliant with MHPAEA.

We raise these concerns based on our historical experience with exclusions and limitations placed on substance use disorder and mental health benefits by insurers. Prior to the ACA, 34% of enrollees in the individual market did not have coverage for substance use disorder treatment, and 18% did not have coverage for mental health services. Moreover, the Congressional Budget Office (CBO) confirmed in its May 2017 [report](#) on the American Health Care Act that these services are most likely to be excluded. CBO states, "Services or benefits likely to be excluded from the EHBs in some states include maternity care, mental health and substance abuse benefits, rehabilitative and habilitative services, and pediatric dental benefits. In particular, out-of-pocket spending on maternity care and mental health and substance abuse services could increase by thousands of dollars in a given year for the nongroup enrollees who would use those services."

We thank you again for undertaking a deliberative consensus-based process for developing stabilization legislation. In the midst of the opioid misuse and overdose epidemic and the suicide epidemic, protecting equitable access to substance use disorder and mental health treatment will undoubtedly save lives. We stand ready to serve as a resource for you as this process moves forward.

Sincerely,

1. 10,000 beds
2. Acadia Healthcare
3. Adcare Educational Institute
4. Addiction Education Society
5. Addiction Haven
6. Addiction Recovery Resources

7. Addiction Resource Council
8. Addiction Services Council
9. Addiction Policy Forum
10. Addiction Treatment Center of New England
11. Addiction Connections Resource
12. Advocates for Recovery Colorado
13. Advocates, Inc.
14. Alabama Society of Addiction Medicine
15. Alano Club of Portland
16. Alcohol & Addictions Resource Center
17. Alcohol/Drug Council of North Carolina
18. Alliance for Strong Families and Communities
19. Alternatives Unlimited, Inc.
20. Amesbury Psychological Center, Inc.
21. American Correctional Association
22. American Federation of State, County and Municipal, Employees (AFSCME)
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 of Nurse Practitioners
28. American Association on Health and Disability
29. American College of Emergency Physicians
30. American Dance Therapy Association
31. American Foundation for Suicide Prevention
32. American Group Psychotherapy Association
33. American Medical Student Association
34. American Mental Health Counselors Association
35. American Nurses Association
36. American Psychiatric Association
37. American Psychological Association
38. American Society of Addiction Medicine
39. Amida Care
40. A New PATH
41. Anthony's Act
42. Anxiety and Depression Association of America
43. Arc of South Norfolk, The
44. Arise & Flourish
45. Arizona's Children Association
46. Arizona Council of Human Service Providers
47. Arizona Society of Addiction Medicine
48. Arkansas Society of Addiction Medicine
49. Association for Ambulatory Behavioral Healthcare
50. Association for Behavioral Healthcare of Massachusetts
51. Association for Community Human Service Agencies
52. Association of Asian Pacific Community Health Organizations (AAPCHO)
53. Association of Community Mental Health Centers of Kansas, Inc.
54. Association of Flight Attendants – CWA, AFL-CIO
55. Association of Persons Affected by Addiction (APAA)
56. Association of Recovery Schools
57. Association of Recovery Community Organizations
58. Association of Women's Health, Obstetric and Neonatal Nurses
59. A Stepping Stone to Success

60. Atlantic Prevention Resources, Inc.
61. Avanti Wellness
62. Awakening Recovery
63. BAMSI
64. Bangor Area Recovery Network, Inc.
65. Bay Cove Human Services
66. Bay State Community Services, Inc.
67. Bazelon Center for Mental Health Law
68. Behavioral Health Network, Inc.
69. Better Life in Recovery
70. Bill Wilson Center
71. Boston Alcohol and Substance Abuse Programs, Inc.
72. Boston Healthcare for the Homeless
73. Boston Public Health Commission
74. BreakingTheCycles
75. Bridge of Central Massachusetts, Inc., The
76. Bridgewell
77. Brien Center for Mental Health and Substance Abuse Services, The
78. Brookline Community Mental Health Center
79. Bullhook Community Health Center, Inc.
80. Burke Recovery
81. California Association of Alcohol and Drug Program Executives (CAADPE)
82. California Consortium of Addiction Programs & Professionals
83. California Council of Community Behavioral Health Agencies
84. California Institute for Behavioral Health Solutions
85. California Society of Addiction Medicine
86. Cambridge Health Alliance
87. Camelot Care Centers, Inc.
88. Cape Cod Healthcare Centers for Behavioral Health
89. Capital Area Project Vox
90. Casa Esperanza
91. Casa Pacifica Centers for Children and Families
92. Catholic Charities Family Counseling and Guidance Center
93. Catholic Family Center
94. Center for Human Development
95. Center for Open Recovery
96. Center for Recovery and Wellness Resources
97. Central City Concern
98. Chautauqua Alcoholism and Substance Abuse Council
99. Chicago Recovering Communities Coalition (CRCC)
100. Child & Family Services, Inc.
101. Child and Family Services of New Hampshire
102. Children's Friend, Inc.
103. Children's Home Society of Washington
104. Children's Law Center
105. Children's Services of Roxbury
106. Chris and Kelly's HOPE Foundation
107. CleanSlate Centers
108. Clergy for a New Drug Policy
109. Clinical and Support Options, Inc.
110. Clinical Social Work Association
111. Coalition of Addiction Students and Professionals Pursuing Advocacy (CASPPA)
112. Coalition to Stop Opioid Overdose

113. Colorado Society of Addiction Medicine
114. Community Catalyst
115. Communities for Recovery
116. Community Anti-Drug Coalitions of America (CADCA)
117. Community Counseling of Bristol County, Inc.
118. Community-Minded Enterprises
119. Community Oriented Correctional Health Services (COCHS)
120. Community Services Institute
121. Community Solutions
122. Community Substance Abuse Centers
123. Comrades of Hope
124. Connecticut Community for Addiction Recovery (CCAR)
125. Connecticut Society of Addiction Medicine
126. Counselors Obediently Preventing Substance Abuse (COPS)
127. Cover2Resources
128. Cutchins Programs for Children and Families
129. DarJune Recovery Support Services & Café
130. Dash for Recovery
131. Davis Direction Foundation - The Zone
132. DC Fights Back
133. DC Recovery Community Alliance
134. Delight Me, Inc.
135. Delphi Behavioral Health Group/MHD
136. Desert Eagle Addiction Recovery
137. Detroit Recovery Project, Inc.
138. Dimock Community Health Center
139. Disability Rights Pennsylvania
140. Doctors for America
141. Doctors for Recovery
142. Dorchester Recovery Initiative
143. Drug and Alcohol Service Providers Organization of Pennsylvania (DASPOP)
144. Drug Policy Alliance
145. Drug Prevention Resources
146. East Bay Agency for Children
147. Easy Does It, Inc.
148. Eating Disorders Coalition
149. Edinburg Center, The
150. Eliot Community Human Services
151. El Paso Alliance
152. Engaged Recovery Community Services
153. Faces and Voices of Recovery
154. Facing Addiction
155. Family Advocates of Georgia, Inc
156. Family Focused Treatment Association
157. Family Service Association
158. Family Service of Greater Boston
159. FAVOR Greenville
160. FAVOR Low Country
161. FAVOR Mississippi Recovery Advocacy Project
162. FAVOR Pee Dee
163. FAVOR Tri-County
164. FED UP! Coalition
165. Fellowship Foundation Recovery Community Organization

166. Fenway Health
167. FHR
168. Florida Society of Addiction Medicine
169. Floridians for Recovery
170. Foundation for Recovery
171. Friends of Recovery - New York
172. FSA – Family Service Agency
173. Futures of Palm Beach
174. G III Associates
175. GAAMHA
176. Gandara Center
177. Georgia Council on Substance Abuse
178. Georgia Society of Addiction Medicine
179. Georgians for a Healthy Future
180. Global Alliance for Behavioral Health and Social Justice
181. Gosnold on Cape Cod
182. Gould Farm
183. Granite Pathways
184. Greater Macomb Project Vox
185. Greater Philadelphia Association for Recovery Education
186. Great South Bay Coalition
187. Greater Cincinnati Recovery Resource Collaborative (GCRRRC)
188. Griffin Recovery Enterprises
189. Harm Reduction Coalition
190. Health Management Group, LTD
191. Heartview Foundation
192. High Point Treatment Center
193. Hillview Mental Health Center, Inc.
194. HIV Medicine Association
195. Home for Little Wanderers, The
196. Hope2Gather Foundation
197. HOPE for New Hampshire Recovery
198. Hope House Addiction Services
199. Hope in Recovery Employment
200. Horizon Health Services
201. IC&RC
202. Indivisible St. Louis
203. Illinois Association for Behavioral Health
204. Illinois Association of Rehabilitation Facilities (IARF)
205. Indiana Society of Addiction Medicine
206. International Nurses Society on Addictions
207. Institute for Health and Recovery
208. Iowa Association of Community Providers
209. Iowa Behavioral Health Association
210. Italian Home for Children, Inc.
211. Jackson Area Recovery Community
212. Jewish Family and Children's Services (JF&CS)
213. Joint Coalition on Health
214. Jordan's Hope for Recovery
215. Judge Baker Children's Center
216. Juneau Recovery Community
217. Justice Resource Institute (JRI)
218. Ka Hale Pomaika'i

219. Kentucky Society of Addiction Medicine
220. KEY Program, Inc., The
221. Kyes 2 a 2nd Chance
222. Lahey Health Behavioral Services
223. Lakeshore Foundation
224. Latah Recovery Center
225. Law Enforcement Action Partnership
226. Legal Action Center
227. Lifehouse Recovery Connection
228. Lifeline Connections
229. Long Island Council on Alcoholism and Drug Dependence, Inc.
230. Long Island Recovery Association (LIRA)
231. Lost Dreams Awaken Center, Inc.
232. Lotus Peer Recovery/SoberKerrville
233. Lowell Community Health Center, Inc.
234. Lowell House, Inc.
235. LUK, Inc.
236. Madison County Council on Alcoholism & Substance Abuse
237. Magnolia Addiction Support
238. Maine Alliance for Addiction Recovery
239. Mariah's Mission Fund of the Mid-Shor Community Foundation
240. Mark Garwood SHARE Foundation
241. Martha's Vineyard Community Services
242. Maryland-DC Society of Addiction Medicine
243. Maryland House Detox
244. Maryland Recovery Organization Connecting Communities (M-ROCC)
245. Massachusetts Organization for Addiction Recovery (MOAR)
246. Massachusetts Society of Addiction Medicine
247. Maxed Out Drug Prevention
248. McShin Foundation
249. Mental Health Association
250. Message Carriers of Pennsylvania, Inc.
251. Messengers of Recovery Awareness
252. MHA of Greater Lowell
253. Michigan Association of Community Mental Health Boards
254. Michigan's Children
255. Michigan Recovery Voices
256. Michigan Society of Addiction Medicine
257. Middlesex Human Service Agency, Inc
258. Mid-Michigan Recovery Services, Inc.
259. Midwest Society of Addiction Medicine
260. Mi-HOPE - Michigan Heroin & Opiate Prevention and Education
261. Minnesota Association of Community Mental Health Programs (MACMHP)
262. Minnesota Recovery Connection
263. Minnesota Society of Addiction Medicine
264. Missouri Recovery Network
265. MOBER
266. Mountain View Prevention Services, Inc.
267. NAADAC – the Association for Addiction Professionals
268. National Alliance for Medication-Assisted Recovery (NAMA)
269. National Alliance for Recovery Residences
270. National Alliance on Mental Illness
271. National Alliance on Mental Illness – San Mateo County

272. National Alliance to Advance Adolescent Health
273. National Alliance to End Homelessness
274. National Association for Rural Mental Health
275. National Association of Addiction Treatment Providers
276. National Association of Clinical Nurse Specialists
277. National Association of Pediatric Nurse Practitioners
278. National Association of Social Workers (NASW)
279. National Association of State Mental Health Program Directors (NASMHPD)
280. National Association for Children's Behavioral Health
281. National Association for Rural Mental Health
282. National Association of County Behavioral Health and Developmental Disability Directors
283. National Association of County & City Health Officials
284. National Association of Social Workers (NASW)
285. National Black Justice Coalition
286. National Council for Behavioral Health
287. National Center on Addiction and Substance Abuse
288. National Council on Alcoholism and Drug Dependence
289. National Council on Alcoholism and Drug Dependence of E. San Gabriel & Pomona Valleys
290. National Council on Alcoholism and Drug Dependence--Greater Phoenix
291. National Council on Alcoholism and Drug Dependence – Maryland
292. National Council on Alcoholism and Drug Dependence – San Diego
293. National Council on Alcoholism and Drug Dependence of the San Fernando Valley
294. National Council on Alcoholism and Drug Abuse-St. Louis Area
295. National Disability Rights Network
296. National Federation of Families for Children's Mental Health
297. National Health Care for the Homeless Council
298. National League for Nursing
299. National Safety Council
300. National Viral Hepatitis Roundtable
301. Navigate Recovery Gwinnett
302. Nevada Society of Addiction Medicine
303. New Futures and New Futures Kids Count
304. New Jersey Association of Mental Health and Addiction Agencies, Inc.
305. New Jersey Society of Addiction Medicine
306. New Life Counseling & Wellness Center, Inc.
307. New Mexico Society of Addiction Medicine
308. New York Association of Psychiatric Rehabilitation Services
309. New York Society of Addiction Medicine
310. New York State Council for Behavioral Health
311. NFI Massachusetts, Inc.
312. NMSAS Recovery Center
313. No Health without Mental Health
314. North Charles, Inc.
315. North Cottage Program, Inc.
316. Northeast Center for Youth and Families, The
317. Northern New England Society of Addiction Medicine
318. Northern Ohio Recovery Association (NORA)
319. Northwest Indian Treatment Center
320. North Suffolk Mental Health Association, Inc.
321. Northern Rivers Family Services
322. North Carolina Society of Addiction Medicine (NCSAM)
323. O'Brien House
324. Ohio Recovery Housing

325. Ohio Society of Addiction Medicine (OHSAM)
326. Oklahoma Citizen Advocates for Recovery & Treatment Association (OCARTA)
327. Old Colony YMCA
328. Open Doorway of Cape Cod
329. Opportunity House, Inc
330. Oregon Recovery High School
331. Oregon Society of Addiction Medicine
332. Overcoming Addiction Radio
333. Parity Implementation Coalition
334. Partnership for Drug-Free Kids
335. Partners in Prevention/National Council on Alcoholism and Drug Dependence of Hudson County, Inc.
336. P.E.E.R Wellness Center, Inc.
337. PEER360 Recovery Alliance
338. Pennsylvania Recovery Organization - Achieving Community Together - (PRO-ACT)
339. Pennsylvania Recovery Organizations Alliance (PRO-A)
340. Pennsylvania Society of Addiction Medicine
341. People Advocating Recovery - PAR
342. Phoenix Houses of New England
343. Phoenix Multisport Boston
344. Pine Street Inn
345. Pivot, Alcohol and Substance Abuse Council of Jefferson County, Inc.
346. PLR Athens
347. Pretrial Justice Institute
348. Prevention Network OCAA
349. Psychiatric Rehabilitation Association
350. Putnam Family & Community Services, Inc.
351. RASE Project
352. REAL- Michigan (Recovery, Education, Advocacy & Leadership)
353. Recover Project/Western MA Training
354. Recovery Allies Of West Michigan
355. RecoveryATX
356. Recovery Café Seattle
357. Recovery Community Foundation of Forsyth
358. Recovery Communities of North Carolina
359. Recovery Community of Durham
360. Recovery Consultants of Atlanta
361. Recovery Data Solutions
362. Recovery - Friendly Taos County
363. Recovery Idaho, Inc.
364. Recovery is Happening
365. RecoveryNC (Governors Institute on Substance Abuse)
366. Recovery Now NY
367. Recovery Point at HER Place
368. Recovery Point of Bluefield
369. Recovery Point of Charleston
370. Recovery Point of Huntington
371. Recovery Point of Parkersburg
372. Recovery Point of West Virginia
373. Recover Wyoming
374. reGROUP
375. Rhode Island Communities for Addiction Recovery Efforts (RICAREs)
376. Riverside Community Care

377. Robby's Voice
378. ROCovery Fitness
379. Rockland Council on Alcoholism and Other Drug Dependence, Inc.
380. Sandusky Artisans Recovery Community Center
381. Sandy Hook Promise
382. Serenity Sistas
383. ServiceNet
384. Shatterproof
385. SMART Recovery
386. S.O.A.R™ Yoga (Success Over Addiction and Relapse)
387. SOBERWORX
388. Solano Recovery Project
389. Solutions Recovery, Inc.
390. Sonoran Prevention Works
391. South Arkansas Regional Health Center, Inc
392. Sound Community Services, Inc.
393. South Middlesex Opportunity Council, Inc. (SMOC)
394. South Bay Community Services
395. South Carolina Society of Addiction Medicine
396. South Central Human Relations Center
397. South End Community Health Center
398. South Shore Mental Health
399. Southwest Washington Recovery Coalition
400. Sovereign Health
401. Spectrum Health Systems, Inc.
402. SpiritWorks Foundation
403. Springfield Recovery Community Center
404. Springs Recovery Connection
405. SSTAR
406. STEP Industries
407. Steppingstone, Incorporated
408. Steve Rummeler Hope Network
409. Student Assistance Services Corp
410. Substance Use and Mental Health Leadership Council of Rhode Island
411. Suncoast Harm Reduction Project
412. Technical Assistance Collaborative, Inc.
413. Tennessee Society of Addiction Medicine
414. Texas Society of Addiction Medicine
415. The Addict's Parents United (TAP United)
416. The Alliance
417. The Ammon Foundation
418. The Bridge Foundation
419. The Bridge Way School
420. The Campaign for Trauma-Informed Policy and Practice
421. The Chris Atwood Foundation
422. The Council on Alcohol and Drug Abuse
423. The Council on Alcohol & Drug Abuse for Greater New Orleans
424. The DOOR - DeKalb Open Opportunity for Recovery
425. The Global Alliance for Behavioral Health and Social Justice
426. The Gooden Center
427. The Kennedy Forum
428. The Ohana Center
429. The Peggie & Paul Shevlin Family Foundation

430. The Recovery Channel
431. The Rest of Your Life
432. The Trevor Project
433. The Village Family Services
434. The Village Project, Inc.
435. There Is No Hero In Heroin Foundation
436. Tia Hart Recovery Community Program
437. T.O.R.C.H Inc.
438. Toward Independent Living and Learning, TILL, Inc.
439. Transforming Youth Recovery
440. Treatment Communities of America
441. Trilogy Recovery Community
442. True Recovery, LLC
443. Trust for America's Health
444. Turning Point Center of Central Vermont
445. Two Guys and a Girl
446. UMass Memorial Community Healthlink, Inc.
447. United Methodist Church - General Board of Church and Society
448. Utah Support Advocates for Recovery Awareness (USARA)
449. Valley Hope
450. Veterans Inc.
451. Vermont Council of Developmental and Mental Health Services
452. Vermont Recovery Network
453. Victory Programs, Inc.
454. Vinfen
455. Virginia Association of Recovery Residences
456. Voice for Adoption
457. Voices of Hope for Cecil County
458. Voices of Recovery San Mateo County
459. Volunteers of America of Massachusetts, Inc.
460. WAI-IAM, Inc. and RISE Recovery Community
461. Walker, Inc.
462. Washtenaw Recovery Advocacy Project (WRAP)
463. Washington Federation of State Employees
464. Washington Recovery Alliance
465. Washington Society of Addiction Medicine
466. Watershed Treatment Programs
467. Wayside Youth & Family Support Network
468. WEConnect
469. Wellspring Recovery Services
470. West Virginia Society of Addiction Medicine
471. WholeLife Recovery Community/ Arizona Recovery Coalition
472. Wisconsin Recovery Community Organization (WIRCO)
473. Wisconsin Society of Addiction Medicine
474. Wisconsin Voices for Recovery
475. Wyoming County CARES
476. Yoga of Recovery
477. Young Invincibles
478. Young People in Recovery
479. Young People in Recovery – Los Angeles
480. Youth Opportunities Upheld, Inc.
481. Youth Villages