



**Association for Behavioral
Health and Wellness**

*Advancing benefits and services
in mental health, substance use
and behavior change.*

April 1, 2016

Department of Defense
Office of the Deputy Chief Management Officer
Directorate of Oversight and Compliance
Regulatory and Audit Matters Office
9010 Defense Pentagon
Washington, DC 20301-9010

Re: RIN 0720-AB65: *TRICARE; Mental Health and Substance Use Disorder Treatment*

Submitted via Regulations.gov

To Whom it May Concern:

I am writing on behalf of the Association for Behavioral Health and Wellness (ABHW) to applaud the Department of Defense's (DoD) recently released proposed rule to reduce administrative barriers to access mental health benefit coverage and to improve access to substance use disorder (SUD) treatment for TRICARE beneficiaries.

ABHW is an association of the nation's leading behavioral health and wellness companies. These companies provide an array of services related to mental health, substance use, employee assistance, disease management, and other health and wellness programs to approximately 170 million people in both the public and private sectors. Many of our member companies also provide coverage for behavioral health benefits to TRICARE beneficiaries. ABHW has supported mental health and addiction parity for twenty years.

The changes proposed in this rule are long overdue and welcome; ABHW members look forward to them becoming policy. We are especially supportive of the additions made related to treatment for opioid addiction. We appreciate the expansion of coverage for treatment of this illness and the recognition that this condition is a disease.

We also believe that the changes proposed in this rule will help our member companies with the management of the program and will ease some of the current administrative burdens.

Thank you for your attention to these important behavioral health issues. If there is anything that we can do to help you as you move forward with this rule please contact me at (202) 449-7660.

Sincerely,

Pamela Greenberg
President and CEO