



April 22, 2020

Drug Enforcement Administration
The Honorable Uttam Dhillon
8701 Morrisette Drive
Springfield, VA 22152

Re: Registration Requirements for Narcotic Treatment Programs with Mobile Components

Dear Administrator Dhillon,

The Association for Behavioral Health and Wellness (ABHW) appreciates the opportunity to comment on the Drug Enforcement Administration's (DEA) proposed rule on Registration Requirements for Narcotic Treatment Programs with Mobile Components (proposed rule). Our comments are below.

ABHW is the national voice for payers that manage behavioral health insurance benefits. ABHW member companies provide coverage to over 200 million people in both the public and private sectors to treat mental health, substance use disorders (SUDs), and other behaviors that impact health and wellness.

ABHW members are committed to ensuring patients with SUDs receive the best care possible. We are particularly interested in curbing the opioid epidemic and supporting a continuum of evidence-based, person-centered care to treat individuals with an opioid use disorder (OUD), including medication assisted treatment. Given the growing opioid epidemic compounded with the current pandemic, we feel it is even more prudent to increase access to SUD treatment. Narcotic Treatment Programs (NTPs) serve an important role in combating SUDs. This proposed rule, which allows NTPs to treat mobile components as a part of the registered NTP instead of requiring the mobile component to register with the DEA separately, is a logical step to ensure SUD patients have better access. Since the clinic providing the NTP is already registered with the DEA, registering the mobile

component associated with that clinic is not necessary. As such, ABHW strongly supports the DEA's proposed rule.

Thank you for the opportunity to comment on this important proposed rule. Please feel free to contact Deepti Loharikar, Director of Regulatory Affairs, at loharikar@abhw.org or (202) 449-7659 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Pamela Greenberg". The signature is written in a cursive, flowing style.

Pamela Greenberg, MPP
President and CEO