



Advancing Health Care Policy
for Mental Health and Addiction

December 21, 2020

The Honorable Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Location Information for 9-8-8 Calls [WC Docket No. 18-336]

Dear Chairman Pai,

The Association for Behavioral Health and Wellness (ABHW) appreciates the opportunity to comment on the Federal Communications Commission's (FCC) Public Notice related to location information for 9-8-8 calls (Public Notice). Our comments are outlined below.

ABHW is the trade association which serves as the national voice for payers that manage behavioral health insurance benefits. ABHW member companies provide coverage to approximately 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 efforts related to suicide prevention. As the FCC's 2019 report to Congress states, suicide rates increased in 49 states between 1999 and 2016 and in 2017, more than 1.4 million adults attempted suicide and more than 47,000 people died by suicide.¹ Even more alarming, new data shows that suicide rates are up more than 50% among young people between the ages of 10 and 24.² Indeed, treating mental illness and SUDs plays a vital role in suicide prevention. Unfortunately, only 40% of those suffering from mental illness receive the treatment they need.³

¹ Federal Communications Commission, Report on the National Suicide Hotline Improvement Act of 2018, August 14, 2019, pg 1. <https://docs.fcc.gov/public/attachments/DOC-359095A1.pdf>, last visited December 17, 2020.

² Black Teenagers with Mental Health Issues May be Reluctant to Seek Help, NPR, December 15, 2020. <https://www.npr.org/transcripts/946617238>, last visited December 17, 2020.

³ Beaton, Thomas. *Employers Could See High Financial Returns for Mental Healthcare*, Health Payer

To that end, ABHW remains supportive of efforts to establish the 9-8-8 crisis line.

However, specific to the questions posed in this Public Notice related to the cost of implementation and risks to patient privacy, we believe problems may arise if the FCC does not make a long-term commitment to the crisis line. Not only must the FCC make a substantial initial investment to get the crisis line off the ground, but also continue the investment to ensure that individuals receive timely attention from appropriately trained personnel without compromising patient privacy. We believe that without proper financing, the 9-8-8 crisis line cannot be utilized to its full potential and may lead to unnecessary harm to individuals, as they may not receive the care they need in time.

Thank you for the opportunity to comment on this critical 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,



Pamela Greenberg, MPP
President and CEO

Intelligence, September 13, 2018. <https://healthpayerintelligence.com/news/employers-could-see-high-financial-returns-for-mental-healthcare>, last visited December 17, 2020.