



Advancing Health Care Policy  
for Mental Health and Addiction

July 16, 2021  
The Honorable Janet Yellen  
Department of Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

**Re: Coronavirus State and Local Fiscal Recovery Funds**

Dear Secretary Yellen,

The Association for Behavioral Health and Wellness (ABHW) appreciates the opportunity to comment on the Department of Treasury's (Treasury) Coronavirus State and Local Recovery Funds interim final rule (IFR). Our comments are 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 (MH), substance use disorders (SUDs), and other behaviors that impact health and wellness.

ABHW members are committed to efforts related to increasing access to MH and SUD services. While the COVID-19 pandemic has brought behavioral health concerns to the forefront, there has long been a need to address these issues in our country. ABHW strongly supports Treasury including behavioral healthcare on the list of uses for monies from the Fiscal Recovery Funds. These funds will help state, local and Tribal governments meet behavioral health needs, including services for MH and SUD treatment, suicide prevention, crisis services, and other behavioral health services. Additionally, it is important to note that the shared beliefs, values, and experiences of any social or racial group can significantly impact treatment for MH/SUD issues.<sup>1</sup> As such, we also encourage Treasury to take measures to spend funds thoughtfully to ensure that behavioral health services are culturally sensitive to a given community.

Thank you for the opportunity to comment on this critical interim final rule. Please feel free to contact Deepti Loharikar, Director of Regulatory Affairs, at [loharikar@abhw.org](mailto:loharikar@abhw.org) or (202) 505-1834 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

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<sup>1</sup> National Alliance on Mental Illness, [Identity and Cultural Dimensions](#), last visited July 6, 2021.