



January 3, 2022

The Honorable Chiquita Brooks-LaSure
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: CMS-1751-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: Medicare Program; Opioid Treatment Programs: CY 2022 Methadone Payment Exception

Dear Administrator Brooks-LaSure,

The Association for Behavioral Health and Wellness (ABHW) appreciates the opportunity to comment on the Centers for Medicare and Medicaid Services' (CMS) interim final rule related to Opioid Treatment Programs: CY 2022 Methadone Payment Exception (interim final 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). Given the recent

sharp increase in drug overdose deaths¹ and crippling impact of COVID-19 on mental health,² we feel it is even more prudent to support those who provide treatment for OUDs via methadone. We agree with CMS that it would not be appropriate to implement a decrease to the Opioid Treatment Programs (OTPs) payment rate when substance use and overdoses have been exacerbated by COVID-19. As such, ABHW strongly supports CMS's interim final rule to freeze payment to OTPs for methadone in 2022.

Thank you for the opportunity to comment on this important interim final rule. Please feel free to contact Deepti Loharikar, Director of Regulatory Affairs, at loharikar@abhw.org or (202) 499-2279 with any questions.

Sincerely,



Pamela Greenberg, MPP
President and CEO

¹ Centers for Disease Control and Prevention, National Centers for Health Statistics, Nov. 17, 2021.

² Dan Goldberg and Brianna Ehley, *Biden's other health crisis: A resurgent drug epidemic*, Politico, Nov. 28, 2020.