



March 21, 2022

The Honorable Carole Johnson  
Health Resources and Services Administration  
Department of Health and Human Services  
5600 Fishers Lane  
Rockville, MD 202852

**Re: Rural Communities Opioid Response Program Performance Measures [OMB No. 0906-0044]**

Dear Administrator Johnson,

The Association for Behavioral Health and Wellness (ABHW) appreciates the opportunity to comment on the Health Resources and Services Administration's (HRSA) request for information (RFI) related to the opioid response program performance measures in rural communities. Our comments are outlined 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 (MH), substance use disorders (SUDs), and other behaviors that impact health and wellness.

While ABHW members are not the target audience of this RFI, we wanted to take this opportunity to express our support for the work HRSA is doing on this important issue. ABHW advocates for several policies related to removing barriers to opioid use treatment, including expanding funding and treatment options. Specifically, we believe that expanding access to medication-assisted treatment (MAT) is vital to combating the opioid epidemic. To that end, we advocate for: removing the in-person evaluation requirement, encouraging the Drug Enforcement Administration to promulgate the telehealth special registration rule which could allow physicians to prescribe MAT via telehealth, and urging Congress to eliminate the X-waiver requirement that providers must fulfill before utilizing MAT. Additionally, we applaud the Administration's increased focus and willingness to allocate more funding for issues related to opioid use disorders.

Thank you for the opportunity to comment on this important RFI. ABHW remains committed to curbing the opioid epidemic and looks forward to partnership opportunities with HRSA to achieve this goal. Please feel free to contact Deepti Loharikar at [loharikar@abhw.org](mailto:loharikar@abhw.org) or (202) 499-2279 with any questions.

Sincerely,

Pamela Greenberg, MPP  
President and CEO