



October 31, 2022

The Honorable Miriam E. Delphin-Rittmon
Assistant Secretary for Mental Health and Substance Use
Substance Abuse and Mental Health Services Administration
U.S. Department of Health and Human Services
5600 Fishers Lane
Rockville, MD 20857

RE: Substance Abuse and Mental Health Services Administration's (SAMHSA) Role in Possible Agency Actions Regarding Mental Health and Substance Use Wellbeing in the Context of Climate Change and Health Equity

Dear Assistant Secretary Delphin-Rittmon,

The Association of Behavioral Health and Wellness (ABHW) appreciates the opportunity to submit comments to the Substance Abuse and Mental Health Services Administration (SAMHSA) on the above-referenced Request for Information (RFI) on behavioral health in the context of climate change and health equity.

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

Our organization aims to increase access, drive integration, support prevention, raise awareness, reduce stigma, and advance evidence-based treatment and quality outcomes. Furthermore, through our policy work, we strive to promote equal access to quality treatment and address the stark inequities created by systemic racism. We are deeply concerned about health disparities in this country in the areas of MH and SUD services and are committed to promoting health equity in the healthcare system. It is also evident that climate change disproportionately impacts vulnerable and marginalized populations, magnifying pre-existing socio-economic, racial or ethnic, and behavioral health disparities.

Our members are committed to learning more about and addressing adverse behavioral health effects brought on by the impacts of climate change. Health plans continue to support post-disaster relief in communities across the United States affected by the most recent wildfires and hurricanes. For example, some of our member health plans have expanded their crisis hotlines to provide text-

based crisis support to healthcare workers before, during, and after disasters to increase aid to peer-run "warmlines" call centers around the country to help them meet increased demand.

ABHW recommends enhancing post-disaster behavioral health supports through utilizing existing trauma-informed frameworks, like the Climate Change and Mental Health Connections resource from the American Psychiatric Association. We also encourage a focus on provider training to outline how to best respond to environmental disasters, including but not limited to psychological first aid (e.g., Mental Health First Aid) and trauma-informed care. Additionally, we promote sharing information about and implementing targeted grants to communities disproportionately impacted by climate disasters.

ABHW applauds SAMHSA for releasing this RFI and for working to prioritize and develop more rigorous research on the intersection of climate change and behavioral health.¹ We understand that researching the impact of climate change on behavioral health is challenging due to the gradual nature of climate change and the complexities that contribute to behavioral health conditions. Climate change is expected to impact behavioral health via a broad range of direct and indirect pathways.

We encourage SAMHSA to conduct continued research to build the evidence base on the effects of climate change on MH and SUD outcomes. Further examination, for example, of resiliency, post-traumatic distress, and suicidality in post-disaster communities, along with long-term behavioral health effects of climate change, including helplessness, anxiety, worry, and fear of rapid climate change across all ages, with a particular focus on children and adolescents would be helpful to the field. We also suggest continued efforts to understand social drivers of health and the impacts on behavioral health.

Thank you for the opportunity to provide feedback to address these crucial issues. We are committed to engaging with SAMHSA and other partners to identify opportunities to work together on climate change and behavioral health. If you have questions, please contact Kathryn Cohen, Senior Director of Regulatory Affairs, at cohen@abhw.org.

Sincerely,



Pamela Greenberg, MPP
President and CEO

¹ Lancet, Climate Change and Mental Health Research Methods, Gaps, and Priorities, March, 2022 available @[https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(22\)00012-2/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(22)00012-2/fulltext).