



**Association for Behavioral
Health and Wellness**

*Advancing benefits and services
in mental health, substance use
and behavior change.*

December 9, 2016

The Honorable Paul Ryan, Speaker
U.S. House of Representatives
H-232, The Capitol
Washington, DC 20515

The Honorable Nancy Pelosi, Minority Leader
U.S. House of Representatives
H-204, The Capitol
Washington, DC 20515

The Honorable Kevin McCarthy, Majority Leader
U.S. House of Representatives
H-107, The Capitol
Washington, DC 20515

The Honorable Steny Hoyer, Minority Whip
U.S. House of Representatives
1705 Longworth House Office Building
Washington, DC 20515

Dear Speaker Ryan, Minority Leader Pelosi, Majority Leader McCarthy, and Minority Whip Hoyer:

The Association for Behavioral Health and Wellness (ABHW) thanks you for including mental health reform provisions in H.R. 34, the 21st Century Cures Act (Cures) and congratulates you on the bill's final passage in the House of Representatives. This legislation marks a significant step toward achieving comprehensive mental health reform in our country.

ABHW is an association of the nation's leading behavioral health and wellness companies. These companies provide an array of services related to mental health, substance use disorders, employee assistance, disease management, and other health and wellness programs to over 170 million people in both the public and private sectors. ABHW and its member companies use their behavioral health expertise to improve health care outcomes for individuals and families across the health care spectrum.

In particular, ABHW applauds provisions strengthening the health care workforce; promoting access to mental health and substance use disorder care through integration incentive grants; improving mental health care on college campuses; and funding the Comprehensive Addiction and Recovery Act.

ABHW supports the Mental Health Parity and Addiction Equity Act (MHPAEA), and our member companies are working with state and federal regulators to ensure proper implementation. While we welcome clarifying guidance, we have concerns that some of the parity language in Cures may lead to unnecessary and overburdensome regulation; and we plan to work with the regulators as they develop the rules.

We appreciate the recognition of 42 CFR Part 2 (Part 2), the outdated privacy regulations around substance disorder records; but the language does not go far enough to ensure persons with substance use disorder receive safe, effective, integrated care. We understand that the rulemaking process prevented the inclusion of more extensive language on this topic, so we look forward to working with you in the next Congress to make necessary changes to Part 2.

We thank you again for your leadership on this issue. If you have any questions, please contact Rebecca Murow Klein at (202) 449-7658 or klein@abhw.org.

Sincerely,

A handwritten signature in black ink that reads "Pamela Greenberg". The signature is written in a cursive, flowing style.

Pamela Greenberg
President and CEO, ABHW