



Oregon Society of Addiction Medicine

A Chapter of American Society of Addiction Medicine

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November 22, 2022

Karen Winkel
Rules Coordinator
Oregon Department of Consumer and Business Services
350 Winter Street NE
Salem, OR 97301

Re: Oregon Society of Addiction Medicine (ORSAM)'s Comments on Proposed Changes to Mental Health Parity Rules

Dear Ms. Winkel,

On behalf of the Oregon Society of Addiction Medicine (ORSAM), the medical specialty society specializing in the prevention and treatment of addiction, thank you for the opportunity to comment on this important issue. Protecting coverage parity for individuals with substance use disorder (SUD) is one of our organization's highest priorities. As such, we are pleased that you are seeking improvements to our state's landmark 2021 parity law. We commend your efforts to protect patients and expand access to SUD treatment.

In 2021, [House Bill 3046](#) was signed into law by Governor Brown. ORSAM strongly supported this legislation as it took significant steps to improve coverage for individuals with SUD by clarifying and strengthening parity requirements. However, while this law represents a significant step forward, we still have much to achieve. Nationally, Oregon ranks last in access to addiction treatment.^{1 2} Additionally, drug overdose deaths in our state have been rising at an alarmingly fast rate since 2019.³ Expanding access to evidence-based addiction treatment for Oregonians is imperative to stem the tide of this devastating crisis.

The proposed changes to the Mental Health Parity rules are an improvement over previous iterations. We believe that these proposed changes will help to address many of the challenges faced during implementation. Specifically, we greatly appreciate the requirement that utilization management and treatment decisions be based on generally accepted standards of care specific to the health condition. Additionally, we support the requirements that level of care placement decisions be exclusively based on non-profit medical association criteria. We believe that these requirements will greatly benefit individuals with SUD by ensuring that they receive the proper level of care without outside barriers. We do encourage that you add specific language requiring that evidence-based treatments for SUD, including FDA-approved medications for addiction treatment (MAT) are covered. We believe that requirements of this nature will

¹ Terry, L. (2022, February 7). Addiction to drugs, alcohol deepens in Oregon, report shows. Oregon Capital Chronicle. <https://oregoncapitalchronicle.com/2022/02/07/oregon-has-worst-drug-addiction-problem-in-the-nation-report-shows/>

² Campbell, S., & Heiden, A. (2022, January 27). Oregon second-worst state in U.S. for addiction, survey says. KOIN.com. <https://www.koin.com/news/oregon/oregon-second-worst-state-in-u-s-for-addiction-survey-says/>

³ Oregon Health Authority. (2022, May). CD Summary: Unintentional Drug Overdose in Oregon: The Current and Potential Impacts of the COVID-19 Pandemic. Oregon.gov. <https://www.oregon.gov/oha/PH/DISEASES/CONDITIONS/COMMUNICABLEDISEASE/CDSUMMARYNEWSLETTER/Documents/2022/ohd7102.pdf>

alleviate confusion and result in expanded access to care for individuals with SUD.

Thank you for allowing us to be a part of this comment process. We hope that you will take our points into consideration. It is imperative that we expand access to evidence-based care in Oregon. We are heartened that your department recognizes this urgency. We hope that you will continue to improve parity coverage in our state in subsequent years. In the future, please do not hesitate to contact me if there is any way that our organization can assist.

Sincerely,

A handwritten signature in cursive script that reads "Moxie Loeffler".

Moxie Loeffler, DO, MPH, FASAM

Policy Chair and Past President, Oregon Society of Addiction Medicine

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