

ADVOCAID HEALTH FOUNDATION, INC

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January 12, 2018

Alderman Michael Murphy
Chairman
Milwaukee City-County Heroin, Opioid, and Cocaine Task Force
Milwaukee City Hall
Milwaukee, WI 53201

Dear Alderman Murphy:

As we all continue to seek solutions that will help deal a death blow to one of society's most pressing and devastating issues, I am writing to offer some insight on what can be done to improve treatment of people suffering from opioid addiction and accountability of health insurance companies.

As you know the numbers and deaths caused by addiction continue to increase. More and more families are being impacted by opioids. Milwaukee needs access to quality drug addiction treatment. Treatment clinics in Milwaukee desperately need health insurance companies to follow federal and state mental health and substance abuse parity rules.

Health insurance companies, such as United Healthcare, must initiate changes to the way they offer coverage of treatment to those suffering from substance dependence. They are limiting in network contracting of substance abuse clinics, limiting covered services, and minimizing reimbursements for substance abuse treatment.

A major report¹ published last month by Milliman Inc. and commissioned by the Bowman Family Foundation analyzed insurance claims by 42 million Americans. The findings paint a stark picture of restricted access to mental health and substance

abuse treatment. According to the American Psychiatric Association CEO, Saul Levin, M.D., M.P.A, the report indicated an “unequal health care system for patients with mental illness or substance use disorders.” The report also identified a pattern of behavior by insurance companies that force patient to use costly out-of-network care compared to medical or surgical care. Because of increased out-of-network costs, patients often abandon substance abuse care and further increase their risk of mortality. The report points to potential violations of federal and state parity laws, which require insurance companies to cover treatment for substance use disorders at the same levels as for other medical illnesses.

Advocaid is a local non-profit healthcare advocacy group that is committed to bringing awareness to substance abuse treatment disparities. In Summer 2017, Advocaid charged United Healthcare with abruptly discontinuing Wisconsin Medicaid treatment coverage of intensive outpatient programming (IOP) for substance abuse. This action caused undue hardships on patients and area clinics servicing patients with opioid addiction. After several months, United Healthcare reinstated coverage for IOP programming, likely due to public outcry and advocacy from healthcare providers, local opioid task forces, and patients.

Recently, United Healthcare again issued limitations on substance abuse treatment coverage. Starting January 1, 2018, United Healthcare commercial and Medicaid plans have limited the amount of drug testing for patients to only 18 total drug tests per calendar year². Drug testing is the cornerstone of monitoring compliance with substance abuse disorders. Without drug testing, providers are left blind as to the safety of medication treatment. In fact, providers would be considered practicing malpractice without an objective measurement of substances used. Advocaid considers arbitrary insurance limitations to drug testing a form of discrimination against substance abuse treatment and a violation of parity laws. In other areas of medicine, such as primary care, blood testing has no limits such as conditions of diabetes or blood coagulation monitoring. In more comparable areas of medicine such as oncology, cancer treatment, there are no limitations to blood testing of monitoring cancer progression. In fact, opioid addiction in the United States currently has a *higher mortality rate* than breast cancer³. In 2016, 63,600 Americans lost their lives due to overdose.

The Milwaukee Heroin, Opioid, and Cocaine Task Force should summon United Healthcare and other like insurance companies that contract with clinics in Milwaukee, to review practices and policies of contracting clinics, and limiting substance abuse treatment or services. We also request the task force request

insurance companies to follow federal and state parity laws that require coverage of substance abuse to be consistent with medical and surgical benefits.

I believe your Task Force can help force a systemic change towards improving the efficiency of treatment. If the CEOs of these insurance companies addressed this matter with your Task Force and agreed to work with the Task Force to seek better treatment options and parity, Milwaukee will be a leading city to have a progressive and meaningful agenda towards substance abuse treatment.

Thank you for your consideration. I look forward to your response.

Regards,

Robert Miranda
Advocaid Spokesperson

1. Addiction and Mental Health vs. Physical Health: Analyzing disparities in network use and provider reimbursement rates. A quantitative approach to investigating nonquantitative treatment limitations: 42 million lives, three years, state by state analysis. Commissioned by Mental Health Treatment and Research Institute LLC, The Bowman Family Foundation. December 2017.
<http://www.milliman.com/nqtdisparityanalysis/>
2. [https://www.uhccommunityplan.com/content/dam/communityplan/healthcareprofessionals/reimbursementspolicies/Drug_Testing_Policy_\(R6005\).pdf](https://www.uhccommunityplan.com/content/dam/communityplan/healthcareprofessionals/reimbursementspolicies/Drug_Testing_Policy_(R6005).pdf)
3. Centers for Disease Control and Prevention. U.S. Department of Health and Human Services. "Drug Overdose Deaths in the United States, 1999-2016." NCHS Data Brief. No. 294. December 2017