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August 17, 2012

Ms. Danielle Holahan
New York State Health Benefit Exchange
New York State Department of Health

Dear Ms. Holahan:

The New York Association of Alcoholism and Substance Abuse Providers, Inc. (ASAP) appreciates Governor Cuomo's solicitation of input from stakeholders regarding the selection of a benchmark health insurance plan for New York State to utilize for its Health Benefit Exchange. ASAP, representing substance use disorder prevention, treatment, and recovery service providers throughout New York State requests that you consider the following recommendations:

- Selection of the Empire Blue Cross-Blue Shield plan as New York's benchmark health plan. This plan includes a continuum of substance use disorder services that would form a good foundation on which to build insurance products for New Yorkers.
- Inclusion of a strong Methadone treatment component and other state of the art pharmacotherapies for the treatment of substance use disorders in New York State's application to the federal government.
- Inclusion of any substance use disorder services that would be necessary to raise the Empire Plan to the level where it would be in full compliance with state and federal parity laws.

ASAP facilitated the convening of a large coalition of stakeholders, the NY Coalition for Whole Health, whose goal is to ensure that the substance use disorder and mental health needs of New Yorkers are addressed as New York State moves forward with healthcare reform and Medicaid redesign. ASAP's policy recommendations related to a benchmark plan and the necessity for a comprehensive continuum of substance use disorder services are reflected in *Essential Health Benefits for New York State: Consensus Principles and Service Recommendations* a document forwarded to you by the Coalition. We urge you to consider this document in your deliberations.

Thank you for this opportunity to provide input as DOH works to develop New York's health insurance exchange.

Sincerely yours,

John Coppola
Executive Director

New York Association of
Alcoholism and Substance
Abuse Providers, Inc.

(P) 518 426-3122
(F) 518 426-1046

One Columbia Place
Suite 400
Albany, NY 12207
www.asapnys.org