Xavier Becerra Secretary U.S. Department of Health and Human Services 200 Independence Avenue, SW Washington, DC 20201

Miriam Delphin-Rittmon, Ph.D. Assistant Secretary for Mental Health and Substance Use Substance Abuse and Mental Health Services Administration 5600 Fishers Lane Rockville, MD 20857

Rahul Gupta, M.D. Director Office of National Drug Control Policy 1800 G Street NW Washington DC 20006

Neera Tanden Director Domestic Policy Council The White House 1600 Pennsylvania Ave NW Washington, DC 20500

Sent electronically

May 14, 2024

Dear Federal Officials:

We are writing to express our concern that the Substance Abuse and Mental Health Services Administration (SAMHSA) recently released two Notices of Funding Opportunities (NOFOs) with a combined total of about 2 billion for State Opioid Response (SOR) and Tribal Opioid Response (TOR) grants, both with non-evidence-based limits on funding for contingency management (CM), despite CM's proven efficacy in the treatment of stimulant use disorder (StimUD). The grants require applicants to implement evidence-based CM and also limit grant funding for CM to \$75 per patient per budget year. Research does not support this funding amount, which we believe will likely render such interventions ineffective.

Recent Centers for Disease Control and Prevention data indicate that cocaine and methamphetamine continue to worsen the number of our nation's overdose deaths dramatically. Stimulants are now implicated in <u>almost half</u> of America's overdoses. CM is the standard of care for StimUD which has been clearly and consistently demonstrated to produce positive treatment results.

Decades of National Institutes for Health-funded research and more than 100 published studies, all using significantly higher incentive levels ranging from \$650 to \$1,800, have shown robust positive treatment outcomes. In short, CM is highly effective for treating StimUD when using clinically effective incentive amounts.

Scientific and policy experts and other stakeholders have expressed concerns about the ineffectiveness of the \$75 limit with federal leaders since 2018. This policy limit wastes taxpayer money, promotes ineffective treatment, and, according to a recent government report, unnecessarily obstructs effective treatment for StimUD.

The undersigned leaders in addiction call upon the Biden Administration to rescind the \$75 'cap' and direct SAMHSA to re-issue these NOFOs permitting the use of evidence-based amounts for CM. Such action would not only align with science. It would also align with <u>actions</u> from the Centers for Medicare & Medicaid Services that have approved state requests to offer CM with incentive levels surpassing the \$75 'cap' as part of those states' Medicaid demonstrations. By embracing evidence-based CM, the Biden Administration can help SAMHSA grantees reduce stimulant-associated overdoses and save more lives.

Please contact Sarah Wattenberg at sarah@nabh.org with any questions or comments.

Sincerely,

American Academy of Addiction Psychiatry

American Indian Health Commission for Washington State

American Osteopathic Academy of Addiction Medicine

American Psychiatric Association

American Psychological Association Services

American Society of Addiction Medicine

Association for Behavioral Health and Wellness

California Consortium of Addiction Programs & Professionals

Connecticut Certification Board

Contingency Management Policy and Practice Group (CMPG)

DynamiCare Health, Inc.

Faces and Voices of Recovery

Legal Action Center

National Association for Behavioral Healthcare

National Association of Addiction Treatment Providers

National Behavioral Health Association of Providers

National Council for Mental Wellbeing

Ophelia Health, Inc.

SMART Recovery

The Foundation for Drug Policy Solutions

Sheila M. Alessi, Ph.D., University of Connecticut School of Medicine

Aimee Campbell, Ph.D., Columbia University Irving Medical Center

Jesse Clark, University of California Los Angeles

Jesse Dallery, Ph.D., University of Florida

Anthony DeFulio, Western Michigan University

Denise A. Dillard, Ph.D., Institute for Research and Education to Advance Community Health, Washington State University

Abigail Echo-Hawk, Director, Urban Indian Health Institute, Executive Vice President, Seattle Indian Health Board

Diann Gaalema, University of Texas Medical Branch

David Gustafson, Center for Health Enhancement Systems Studies (CHESS),

University of Wisconsin

Sarah Heil, University of Vermont

Katherine Hirchak, Washington State University

Leslie Hulvershorn, University of Indiana

Mikhail Koffernaus, University of Kentucky

David Ledgerwood, Wayne State University

Jessica Montoya, University of California San Diego

Larissa Mooney, M.D., Professor of Clinical Psychiatry, University of California Los Angeles

Rory Pfund, University of Memphis

Michelle Sarche, Ph.D., Centers for American Indian and Alaska Native Health,

University of Colorado

Stacy Rasmus, Ph.D., Center for Alaska Native Health Research, University of Alaska

Steven Shoptaw, University of California Los Angeles

Michael Smoker, University of Indiana

Catherine Stanger, Dartmouth University

Kenneth Stoller, M.D., DLFAPA, Professor, Johns Hopkins University; Director,

Broadway Center for Addiction

Kamilla Venner, Ph.D., Center on Alcohol, Substance Use, & Addiction

Jeremiah Weinstock, Saint Louis University

Rachel Winograd, University of Missouri Saint Louis