



September 18, 2023

Kathleen A. Birrane
Insurance Commissioner
Maryland Insurance Administration
200 St Paul Street #2700
Baltimore, MD 21202

Dear Commissioner Birrane,

In recognition of National Recovery Month, the 15 undersigned organizations from the Maryland Parity Coalition wish to express our concern about the Maryland Insurance Administration's (MIA) use of stigmatizing imagery in connection with substance use disorders and offer our assistance in informing protocols for future images. The Moore-Miller Administration has placed a strong emphasis on reducing prejudice and discrimination against people with substance use disorders, including through stigma,¹ which deters individuals from seeking the life-saving care they need and deserve. We urge the MIA to adopt imagery guidelines that will prevent further stigmatization of these conditions.

On two recent occasions, the MIA has used substance use imagery that has been particularly stigmatizing. In October 2022, the MIA's Consumer Education and Advocacy Unit hosted a webinar on "[How to Request Authorization to Receive Out-of-Network Services for Mental Health and Substance Use Disorders](#)," in which the black and white image on the title page included a sprawled out hand with a needle, pills, and powder. On August 18, 2023, the MIA's Daily Digest Bulletin recognizing Overdose Awareness Day included an individual of color despondent and peering out over a pile of pills, designed to advertise the 24/7 hotline individuals can use to contact the MIA for medical necessity and emergency appeals.

Stigma is a significant barrier to the treatment of individuals with substance use disorders, and these types of images perpetuate negative stereotypes of people with these conditions while also potentially triggering individuals who have substance use disorders. A recent qualitative study found that realistic depictions of actual substances – including powders, crystals, marijuana, pills, alcohol containers or services, and cigarettes/vapes – and of people using substances and paraphernalia reinforce stigmatizing views of individuals with substance use disorders and can trigger trauma or cravings to use substances, including among individuals with years of recovery.² Based on this feedback, the authors determined that it is never appropriate to use drug use and drug paraphernalia imagery to depict substance use or misuse. By contrast, images depicting positive experiences in treatment and photos of wellness, health, and vitality are less

¹ Opioid Operational Command Center, "Stigma of Addiction Realized," <https://beforeitstoolate.maryland.gov/stigma/>.

² Jessica Hulsey et al., "Stigmatizing Imagery for Substance Use Disorders: A Qualitative Exploration," Health & Justice (July 4, 2023), <https://healthandjusticejournal.biomedcentral.com/articles/10.1186/s40352-023-00229-6>.

stigmatizing when depicting individuals seeking or receiving treatment for substance use disorder or in recovery.

The authors also developed a report with recommendations for using non-stigmatizing imagery for substance use disorders,³ which we encourage the MIA to follow. Researchers in other countries have identified similar findings about the inadvertent consequences of using photos that perpetuate negative and racially stereotypical views of substance use and recommendations for more appropriate imagery.⁴

SAMHSA's guidelines for imagery relating to the new 988 Suicide & Crisis Lifeline are consistent with these findings. SAMHSA encourages images for 988 materials that "portray real people, living day-to-day, reflective and hopeful at the same time," and avoid the use of black and white imagery.⁵ We recommend the MIA use these guidelines to inform its policies on imagery for substance use disorders and mental health as well.

We are eager to work with you to help prevent stigmatizing imagery from interfering with Marylanders' access to substance use disorder and mental health treatment at this time of record-breaking overdose deaths and increasing rates of suicide. Thank you for your consideration, and for your commitment to improving access to care. We look forward to speaking with you and your team and, in the meantime, please contact Ellen Weber (eweber@lac.org) and Deb Steinberg (dsteinberg@lac.org) with any questions.

Sincerely,

AHEC West
Daniel Carl Torsch Foundation
Institutes for Behavior Resources, Inc.
Legal Action Center
Maryland Addiction Directors Council (MADC)
Maryland Association for the Treatment of Opioid Dependence (MATOD)
Maryland Coalition of Families
Maryland Heroin Awareness Advocates
Maryland Peer Advisory Council
Maryland Psychiatric Society
Montgomery Goes Purple
NAMI Maryland
National Council on Alcoholism and Drug Dependence-Maryland (NCADD-Maryland)
On Our Own of Maryland
Voices of Hope, Inc.

³ Jessica Hulsey & Kayla Zawislak, "Guidance for Using Non-Stigmatizing Imagery for Substance Use Disorders and Justice Involvement," *Addiction Policy Forum* 13-19 (Mar. 18, 2021) https://54817af5-b764-42ff-a7e2-97d6e4449c1a.usrfiles.com/ugd/54817a_bb3fb7b654f949fa92abad756e7b6d7b.pdf.

⁴ Stephen Parkin, "How photos used to illustrate articles about alcohol and other drugs may perpetuate stigma," *Society for the Study of Addiction* (May 25, 2021), <https://www.addiction-ssa.org/how-photos-used-to-illustrate-articles-about-alcohol-and-other-drugs-may-perpetuate-stigma/>.

⁵ SAMHSA, "988 Logo and Branding," <https://www.samhsa.gov/find-help/988/partner-toolkit/logo-branding> (Photography subsection).

Cc: Lt. Gov. Aruna Miller
Special Secretary Emily Keller
Secretary Laura Herrera-Scott
Associate Commissioner David Cooney
Associate Commissioner Joy Hatchette