



National Coalition for Access to Autism Services

March 19, 2020

The Honorable Mitch McConnell
Majority Leader
United States Senate
Washington, D.C. 20510

The Honorable Charles E. Schumer
Minority Leader
United States Senate
Washington, D.C. 20510

RE: COVID-19 Federal Assistance for Autism Services

Dear Leader McConnell, Leader Schumer:

The National Coalition for Access to Autism Services (NCAAS) is a nonprofit organization representing autism treatment providers and the hundreds of thousands of children and families they serve in every state of America who are affected by autism spectrum disorder (ASD). NCAAS providers employ more than 150,000 employees nationwide and contract with TRICARE, public schools, Medicaid, CHIP and commercial insurers to provide essential medically necessary treatment to patients of all ages, although the vast majority of patients are children. It is estimated that there are more than 200,000 patients who receive regular, near-daily Applied Behavior Analysis (ABA) therapy, the primary treatment for ASD. ABA is the process of systematically applying interventions based upon the principles of learning theory to improve socially significant behaviors to a meaningful degree and to demonstrate that the interventions employed are responsible for the improvement in behavior.

Because of the 1:1 nature of treatment and the young ages of the patients, social distancing and proper hygiene are difficult to maintain. Additionally, many patients with ASD have other underlying health conditions that place them at greater risk if they were to be exposed to the coronavirus. As a result, virtually all 1:1 treatment has been suspended. Without federal assistance in the wake of COVID-19, the provider framework that ensures access to autism treatment will collapse, children will be left without treatment, and parents will lose critical guidance and support, not just during this health emergency, but also for some extended period after this health emergency subsides, as there will be little of this industry left to provide these essential mental health services.

As a result of the COVID-19 pandemic, autism therapy providers seek direct federal assistance equal to the payment of all prior authorized treatment hours, continuing through this health emergency beginning February 2020, and ending 60 days after the federal government's recommendations for social distancing terminates.

Specifically, we propose a federal structure that is based on a process the State of California has established for Medicaid eligible participants, but expanding the program at the federal level to include all ABA services for patients who have been a participant in a federal or commercial insurance program. We would request that the Department of the Treasury or the Department of Health and Human Services or another federally designated entity authorize payment for the difference between hours authorized by the funding source and hours delivered when the reduction of service from the prior month's level in treatment is attributable to a federal government social distancing directive or other reasons directly related to the COVID-19 emergency. Authorizations that expire during the emergency declaration should be treated as if they were automatically renewed, which is the typical protocol for autism treatment.

Specifically, we propose a request for payments up to \$660 million to companies that provide ABA services to assure the continued employment of those providing 1:1 ABA services to patients with ASD and to ensure continued access to critical treatment for patients with ASD. Applicants for these funds would certify that such funding would be used to employ a number of employees equivalent or greater than the number of employees employed in February 2020. In the absence of this program, and notwithstanding the assistance provided in the Congress' First and Second Supplemental Emergency Appropriations bills, the autism treatment industry will be decimated. No matter how briefly the current social distancing guidance from the Centers for Disease Control (CDC) remains in place, it will be years before ABA services will be able to meet the current demand for these services – a demand that is already oversubscribed today – if federal assistance is not provided.

Please support this request. Eighty percent of the autism industry workers earn \$20 or less per hour. These are the most vulnerable in America who live paycheck to paycheck. Please contact Denis Dwyer at didwyer@wms-jen.com for additional information about this issue.

Sincerely,

360 Behavioral Health
ABA Consultation & Services
ABEDI, Inc
Acceleration Behavioral Therapies
ACT
Alternative Behavior Strategies
Autism Behavior Services
Autism Learning Partners
Autism Spectrum Therapies
Behavior Analyst Certification Board (*represents more than 100,000 clinicians and technicians*)
Behavior Frontiers

Behavioral Health Center of Excellence
Behavioral Intervention Association
Behavioral Support Partnership
Bierman ABA
Blue Sprig
Brightwork ABA Therapy, Inc
Butterfly Effects, LLC
Center for Autism and Related Disorders
Center for Social Dynamics
Centria
Chancelight Behavioral Health
Counsel of Autism Service Providers
Creative Behavior Intervention
FirstSteps for Kids, Inc
Footprints Behavioral Interventions, Inc
Fraser
Gateway Learning Group, LLC
Hopebridge, LLC
InBloom Autism
InterCare
Intercare Therapy
Leaps n Boundz Inc.
Learn Behavioral
Lovaas Institute
Love 2 Learn
Minnesota Autism Center
New England ABA, LLC
Priorities ABA
Proud Moments
Reaching Milestones
StaffRehab
STAR of CA, LLC
The Behavior Center
The Stepping Stones Group, LLC
Therapeutic Pathways
Trumpet Behavioral Health
Working With Autism, Inc