

DHS Responses to Public Comments Regarding Autism Services Rate Study and Waiver Renewal

S. Laundau, Compliance, MBH Services LLC

Comment: First, thanks for providing the opportunity to raise voices. Please see our public comment below on the proposed ABA Therapy Medicaid Manual:

We are dismayed that, under section 223.000 Telemedicine Services of the proposed ABA Medicaid manual, only Family adaptive behavior treatment services may be delivered through telemedicine, and the rest of the ABA services will need to be conducted in person.

Currently, Medicaid allows Adaptive Behavior Treatment with Protocol Modification/Supervision/Training the RBT to be rendered via telehealth and Family adaptive treatment (as referenced in the first attachment). With Medicaid Finally publishing an ABA manual with all its specific policies, it would be fair to add all other ABA services as appropriate for delivery via telehealth. Instead, the proposed manual introduces further restrictions by removing the allowance of protocol modification/supervision while multiple states across the country fully allow all these services via telehealth, citing extensive evidence, especially during COVID, that ABA is equally effective when delivered via telehealth as it is in person. The efficacy is further supported as effective by the Council of Autism Service Providers (CASP), which has established the appropriateness of ABA treatment via telehealth (see second attachment, pages 42 and 44).

Moreover, removing protocol modification with supervision, which has been proven effective in the ABA industry, poses a significant challenge for rural beneficiaries in dire need of care. These individuals might struggle to access necessary services due to a lack of local resources and specialists. The absence of protocol modifications diminishes treatment flexibility, potentially reducing the quality and effectiveness of care for those in remote areas.

Given the evidence presented, we ask that you reconsider adding the telehealth benefit to all ABA services or at least keep it for ABA protocol modification/supervision.

Attachments:



ABA_Practice_Guidelines_3_0.pdf



AUTISM-EPSDT_Proc
Codes.pdf

Response: Thank you for your comment. The State agrees with your comment and will revise the proposed Medicaid manual to allow for the performance of adaptive behavior treatment with protocol modification services via telemedicine.