

The Council of Autism Service Providers (CASP) appreciates your efforts to support behavioral health provider's effort to adopt health information technology systems. We share your concern that previous federal efforts to promote the adoption and meaningful use of electronic health records and supporting technologies have historically left out mental health and substance abuse disorders.

The inclusion of **Behavior Analysts** in the Behavioral Health Information Technology (BHIT) Coordination Act is essential to ensure that the behavioral health providers working with autistic individuals have access to vital IT systems and are part of the widespread adoption of health IT throughout the behavioral health community.

According to the most recent prevalence estimates from the Centers for Disease Control and Prevention, about 1 in 36 children has been identified with autism spectrum disorder (ASD). **Behavior Analysts** provide standard behavioral health services to autistic individuals which has been recognized in all fifty states and the Federal Employees Health Benefits (FEHB) Program.

Background:

Applied Behavior Analysis Has Emerged as a Standard Autism Intervention Over the Last Fifty Years

- Applied Behavior Analysis (ABA) is a treatment that is frequently prescribed for people with autism.
- ABA practitioners are called **Behavior Analysts**.
- Like other medical and behavioral health providers, **Behavior Analysts** rely upon strategies and procedures from peer-reviewed literature, established treatment methods, and clinical decision-making frameworks.
- The use of ABA to achieve successful development, restoration, and maintenance of abilities for autistic individuals has been documented in hundreds of peer-reviewed studies published over the past 50 years.
- ABA is widely recognized by a number of authorities, including the U.S. Surgeon General, the American Academy of Pediatrics, and the National Institute of Mental Health.
- The American Medical Association adopted permanent CPT codes for applied behavior analysis (ABA) that went into effect on January 1, 2019, providing recognition that ABA is an empirically supported medical intervention.

- Over the last twenty years, all fifty states have implemented required coverage of medically necessary ABA by private health insurance and State Medicaid Plans under Early Periodic Screening Diagnostic and Treatment (EPSDT).

Behavior Analysts are Required to Meet Rigorous Requirements to Practice ABA

- Training, certification, and licensure requirements facilitate accountability and excellence by establishing ethical and professional standards and education, competency, and supervision requirements.
- Typically, Behavior Analysts Earn a master's degree or PhD in psychology or behavior analysis, pass a national certification exam, and where applicable, seek a state license to practice.
- Established in 1998 as a nonprofit corporation, the Behavior Analyst Certification Board was the first national organization to certify practitioners of ABA.

Behavior Analysts Provide Mental Health Services Frequently Referenced by Federal Agencies

- ABA is frequently referenced in federal communications related to the Mental Health Parity and Addiction Equity Act (MHPAEA). For example, the United States Department of Labor reported in April 2023:

*Under the Mental Health Parity and Addiction Equity Act (MHPAEA), group health plans and health insurance issuers that offer mental health benefits must ensure that mental health benefit financial requirements and nonquantitative treatment limitations are generally no more restrictive than those applied to medical/surgical benefits. Many plans often cover benefits for autism as part of their mental health benefits. **These benefits, such as those for treatment of Applied Behavior Analysis (ABA) therapy, are protected under MHPAEA. Therefore, we in EBSA are focused on ensuring these protections are realized. We do this through vigorous enforcement, compliance assistance, and collaboration with other federal agencies.***
