

Dear Interagency Autism Coordinating Committee Members,

I write to you today on behalf of The Council of Autism Service Providers (CASP). CASP is a non-profit association of organizations committed to providing evidence-based care to people diagnosed with autism spectrum disorder across the lifespan.

CASP represents the autism provider community to the nation at large, including government, payers, and the general public. Our membership includes multi-specialty clinics, adult-service providers, applied behavior analysis clinics, and schools.

Our goals are to:

- Ensure quality, safe and most effective care
- Promote continuous quality improvement
- Help to ensure that the money spent for care and treatment is directed to the most effective, evidence-based practices
- Represent providers of care to government, payers, and the public
- Write and share public policies that balance effective treatment and economic principles

As the committee take on the important work of finalizing the strategic plan, we respectfully request your consideration of the following:

Prioritization of Generally Accepted Standards of Care (GASC)

Recent activity in the courts (i.e., *Wit v. United Behavioral Health*) and in state legislatures has emphasized the need to implement **generally accepted standards of care** for mental disorders as defined in the Diagnostic and Statistical Manual of Mental Disorders, including autism spectrum disorder. Additionally, the Department of Labor and CMS have been working to ensure that health plans are in compliance with requirements under the 2008 Wellstone Domenici Mental Health Parity and Addiction Equity Act.

CASP is home to the practice guidelines for applied behavior analysis, [Applied Behavior Analysis Treatment of Autism Spectrum Disorder: Practice Guidelines for Healthcare Funders and Managers](#) (“guidelines”). These guidelines, which have been recognized by payers and state agencies, most recently were proposed by the California Department of Insurance as generally accepted standards of care related to SB 855, California’s recently implemented mental health parity law. **SB 855 requires that plans not only implement the guidelines but are trained in their usage.** Similar legislation has been passed in other states and is being considered nationwide.

As you develop a strategic plan specific to interventions, we ask that you consistently refer to generally accepted standards of care, i.e., the CASP Practice Guidelines referenced previously.

Need for Quality Assurance in the Provision of Autism Services

Over the past decade, state legislation and regulation have increased funding of applied behavior analysis services when considered medically necessary through health insurance and Medicaid. In response to the growth in this field of autism service provision, in 2022, CASP founded the Autism Commission on Quality (ACQ) to establish and promote organizational standards that improve the quality, effectiveness, and outcomes of applied behavior analysis services for autistic people. ACQ's vision is for all recipients of applied behavior analysis services to reach their full potential through access to organizations offering the highest level of care.

As you grapple with the balance of access and quality in the strategic plan, we encourage you to review the [ACQ Applied Behavior Analysis Accreditation Program Standards and Guide](#).

Ongoing Consideration of Military Families

CASP is actively advocating to improve access to care for active-duty and retired military personnel and their families. **It is critical that the Autism Care Demonstration (ACD) recognize previously mentioned generally accepted standards of care as well as applicable CPT coding that has been published by the American Medical Association.** This will help protect against fraud and will also ensure meaningful outcomes for the autistic population the ACD is intended to help.

We are regularly engaging with members of the House and Senate Armed Services Committees but ask that the IACC work to specifically address the needs of this unique population.

Thank you for consideration and for your commitment to the communities we serve.

Sincerely,



Judith Ursitti

Vice President of Government Affairs