

Sylvia Fogel, M.D
Chair
Interagency Autism Coordinating Committee (IACC)
National Institutes of Mental Health
6001 Executive Boulevard
Bethesda, MD 20892

Re: Recommendations to Support High-Quality, Evidence-Based Applied Behavior Analysis (ABA) Services in Medicaid

Dear Dr. Fogel:

The Association for Behavioral Health and Wellness (ABHW) appreciates the opportunity to provide our recommendations regarding the delivery, oversight, and quality of Applied Behavior Analysis (ABA) services. ABHW is the national voice for payers managing behavioral health (BH) insurance benefits. Our member companies provide coverage to 200 million people in the public and private sectors to treat mental health (MH), substance use disorders (SUDs), and other behaviors that impact health and wellness. ABHW supports policies that promote access to individualized, evidence-based, clinically appropriate care, while strengthening quality, transparency, accountability, and program integrity across Medicaid programs.

Access to clinically appropriate ABA services remains critical for many individuals and families. ABA is an evidence-based intervention designed to help individuals develop communication, social, and daily living skills, and is supported by our members and clinicians as effective for certain individuals. It is most effective when implemented with appropriate supervision, care planning, and validated evaluation tools.

As demand for ABA services has increased significantly in recent years, policymakers and stakeholders have raised questions regarding variation in service delivery, treatment intensity, quality measurement, and oversight practices across states and programs. Recent oversight activity has highlighted program integrity concerns associated with rapid growth in ABA utilization without consistent evidence demonstrating meaningful functional improvement or long-term patient outcomes.

We encourage the IACC to support the development of high-quality and accessible ABA programs through the implementation of oversight and care planning protocols. ABHW developed a series of [tenets](#) and [policy recommendations](#) for the U.S. Department of Health and Human Services (HHS) and the Centers for Medicare & Medicaid Services (CMS) in collaboration with our member health plans and their clinical and policy experts; these reflect feedback gathered on current best practices for administering ABA services and consistent, evidence-based, and clinically appropriate oversight and implementation across states. We share the goal of improving outcomes for individuals receiving ABA services and would welcome the opportunity to engage with the Committee towards these goals.

ABHW supports efforts to strengthen access to high-quality ABA services while ensuring care remains evidence-based, patient-centered, and clinically appropriate. We believe greater consistency in assessment, treatment planning, provider standards, and care coordination can improve outcomes for individuals receiving ABA services while promoting accountability and program integrity. We appreciate IACC's consideration of these recommendations and welcome the opportunity to continue engaging in policies that support effective behavioral health care delivery.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah H. Wit". The signature is fluid and cursive, with a large, stylized 'D' and 'W'.

Debbie Withey, MHA
President and CEO