March 21, 2020

Captain Edward Simmer  
Defense Health Agency/TRICARE  
Via email

Dear Captain Simmer,

The Council of Autism Service Providers (CASP) is an international trade association of autism service providers who have demonstrated commitment to providing evidence-based care (e.g., applied behavior analysis; ABA) to individuals with autism.

ABA is the standard and essential treatment for autism and is a covered service under the majority of public and private health benefit plans, Federal Employee Health Benefit plans, and the TRICARE Comprehensive Autism Care Demonstration (ACD).

ABA is typically provided in a face-to-face setting, with a single behavior analyst supervising the delivery of services to as many as 12-24 patients (depending on individual case complexity and access to case support from a Board Certified Assistant Behavior Analyst). Measures recently imposed nationwide to curtail the spread of the COVID-19 have significantly disrupted the ability of ABA providers to deliver this medically necessary treatment. Disruption of ABA services for an individual with autism can lead to regression of adaptive skills, resurgence of maladaptive behaviors and increased health care costs.

In many cases, ABA can be effectively delivered remotely via telehealth. As such, some payers have allowed for reimbursement of ABA provided or supervised by qualified behavior analysts via telehealth for several years. In response to the COVID-19 pandemic, many public and private funders are quickly acting to make at least temporary allowances for ABA to be reimbursed when delivered via telehealth. Currently, the TRICARE ACD does not reimburse for ABA services provided or supervised via telehealth.

Given the impact of COVID-19 on the autism community, facilitating the delivery of medically necessary ABA via telehealth is a priority for CASP and its member organizations. CASP has created a Telehealth Task Force of subject matter experts from across the country to help guide health care funders and payers as they consider adoption of a telehealth benefit for ABA.

On behalf of our member organizations and the clients they serve, we ask that you please encourage the leadership team from the Defense Health Agency (DHA) to work with the CASP Telehealth Task Force. We ask that DHA expedite the adoption of an ACD benefit that allows
for reimbursement of ABA delivered via telehealth. Coordination of efforts regarding the development of clear policies for effective telehealth services will support continued military readiness during these unprecedented times.

Sincerely,

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The Council of Autism Service Providers supports our members by cultivating, sharing, and advocating for provider best practices in autism services. CASP represents the autism provider community to the nation at large, including government, payers, and the general public. We serve as a force for change, providing information and education, and promoting standards that enhance quality.