



### Statement Regarding Access to Care Issues Under the Tricare Autism Care Demonstration

The Tricare for Kids Coalition, a stakeholder group of children’s health care advocacy and professional organizations, disability advocacy groups, military and veterans’ service organizations and military families, is committed to ensuring that the military health system meets the unique health needs of the more than two million children covered by Tricare. We believe that military children should be able to access the care they need at the right time, in the right setting from the right providers. We have concerns regarding recent changes to Applied Behavior Analysis (ABA) reimbursement rates under the Comprehensive Autism Care Demonstration (ACD).

ABA is an evidence based behavior intervention and is widely accepted throughout the medical community as an effective treatment for ASD. It is endorsed by the American Academy of Pediatrics and the National Institute for Mental Health.

In 2014, Tricare, the Department of Defense (DoD) healthcare program for military service men and women and their families, implemented changes to its coverage of ABA through its Comprehensive Autism Care Demonstration. The ACD and ongoing efforts to address the treatment needs of military children with ASD are laudable, but the Coalition remains concerned the ACD should not impose barriers that prohibit families from actually accessing the care that is now covered.

In late 2015, eighteen months into the ACD, Tricare announced new reimbursement rates for ABA therapy. A majority of these changes resulted in a 15-20% cut in reimbursement rates.

One of the purposes of the ACD is to “increas[e] access and delivery of ABA services.” By reducing reimbursement rates eighteen months into the ACD, it may alter the overall demonstration results and future coverage of ABA.

The DoD’s own studies indicate a major supply issue with too few Board Certified Behavioral Analysts (“BCBAs”) available to provide services, with several areas proximate to military bases having very few or no BCBA’s. Further, the studies indicate TRICARE’s proposed rates for technicians are significantly below the national average and, if adopted, might lead providers either to leave Tricare’s networks or prioritize serving children with ASD from other health insurers over Tricare-covered children.

It appears access to ABA services will be adversely affected, and therefore, the TFK Coalition urges that the proposed ABA reimbursement rate reductions be postponed pending completion of the ongoing Comprehensive Autism Care Demonstration in 2018 and that Tricare be directed to conduct a *comprehensive* analysis of ABA services, including reimbursement rates, to assure adequate autism insurance coverage for Tricare beneficiaries.

Sincerely,

Tricare for Kids Coalition

