

**Congress of the United States**  
**Washington, DC 20515**

March 9, 2016

The Honorable Ashton B. Carter  
Secretary  
United States Department of Defense  
The Pentagon  
Washington, DC 20301

Dear Secretary Carter:

We are writing to express our continued concerns regarding the Defense Health Agency's (DHA) proposal to reduce TRICARE reimbursement rates in 2016 for Applied Behavior Analysis (ABA) to beneficiaries diagnosed with Autism Spectrum Disorder (ASD).

Having worked with DHA to highlight the negative impacts of the initial proposal, in which some providers would have seen their reimbursement rates cut in half, we are grateful that the Department of Defense (DOD) has chosen to reverse those plans and put forth a more modest proposal.

That said, we remain concerned that the new rates could result in a substantive reduction in access to crucial ABA services for the more than 26,000 military children with ASD. We, therefore, ask that you postpone the implementation of the reimbursement rates, which are expected to become effective on or about March 30, 2016, until the remaining issues can be properly assessed to ensure those in need of ABA services have access to them and that the integrity of the demonstration will not be compromised.

Of particular concern is the effect the proposed reductions of as much as 15% annually in reimbursement rates for ABA services will have on communities where access is already limited. DOD's own study to justify these proposed reimbursement reductions notes that there are locations near large and important military bases throughout the U.S. where there is no access to ABA services at all, further indicating that demand for autism services far outstrips supply.

As you are aware, the current autism coverage under the TRICARE program began as a demonstration program on July 25, 2014 and is scheduled to end on December 31, 2018. The demonstration was designed to combine three different TRICARE programs that covered ABA services for beneficiaries into a single program with one uniform benefit. Among the objectives of the demonstration is to *expand access* to these services among TRICARE beneficiaries, especially active duty dependents. With the most recent proposed changes, however, some ABA providers have already announced plans to leave certain service areas and there is concern more providers will follow upon implementation of the new rates. In addition, over time, given the disparity between the national average reimbursement rate and TRICARE's proposed rates, we expect the supply/demand imbalance to further reduce military family access to these ABA services. Ironically, this 15% reduction in reimbursement rates occurs at a time when public and private insurance payors are increasing autism coverage as 43 states have now mandated autism coverage. We are concerned that while access grows outside of the

military community, TRICARE's reduced reimbursement rates for ABA coverage compounded with overall increase in demand will further draw resources away from military families, instead of expanding access.

Additionally, DHA's proposed reimbursement rate cuts come at the same time DHA is imposing new certification requirements on all Behavior Technicians (BT) providing ABA services to TRICARE beneficiaries. While these certification requirements will assure that TRICARE beneficiaries obtain ABA services from qualified technicians, they also impose additional costs on TRICARE ABA services providers and extend to as much as 130 days the time it takes to hire, train and credential BTs to serve TRICARE beneficiaries. These certification requirements, while assuring qualified technicians are providing these services, will nonetheless compound the impact of reimbursement rate reductions, because they will create yet additional delays to access services when taking into consideration that BTs are typically part-time employees, with very high turnover rates, resulting in the regular replication of the hire, train and credential process.

Finally, to make changes in the reimbursement rate in the middle of the demonstration program will clearly skew the results of the demonstration, especially as it relates to evaluating access and utilization and the value of these TRICARE services.

For these reasons, we ask that the pending ABA reimbursement rate changes prescribed by the DHA be postponed until a review of the availability of ABA services. We urge that you take this action before providers leave the TRICARE ABA services market and begin to no longer accept new TRICARE eligible ABA services patients.

Thank you very much for your time and attention to this request and we look forward to continuing to work with you to ensure that military families have access to ABA services should they seek the option.

Sincerely,

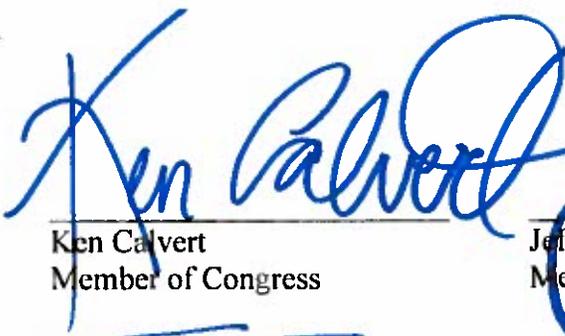
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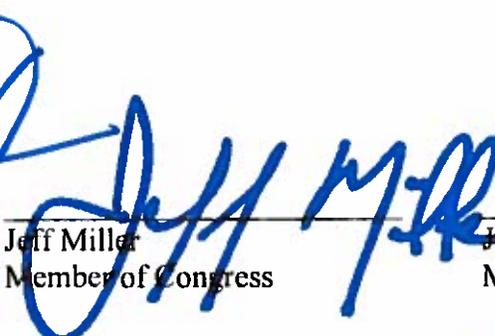
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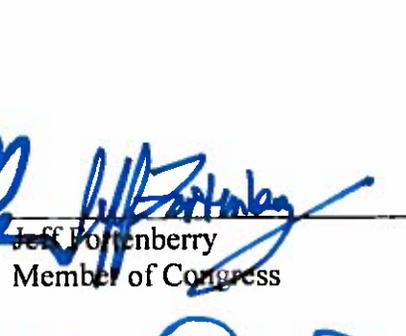
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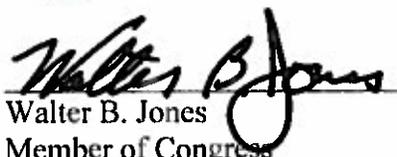
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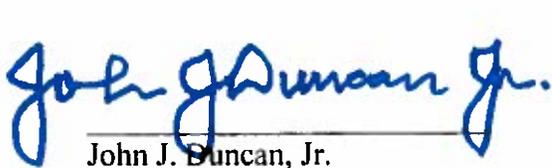
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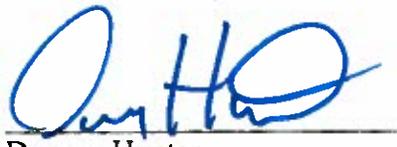
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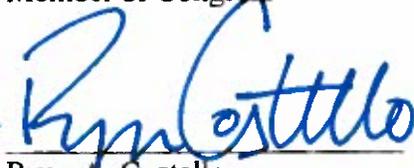
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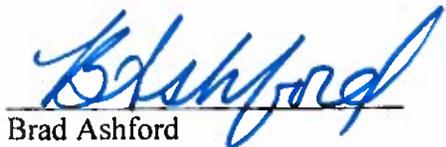
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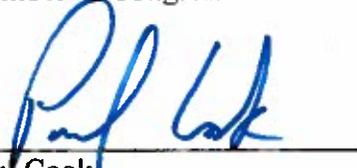
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