

# OHIO AUTISM INSURANCE COALITION

## ENSURING ACCESS TO TREATMENTS FOR INDIVIDUALS WITH AUTISM



### BIG PUSH TO REMOVE AGE AND HOUR CAPS IN PRIVATE PLANS

The age (non-quantitative) and hour and visit caps (quantitative) are treatment limitations applied to ABA, speech, and occupational therapies in many state-regulated, fully funded commercial plans. When applied to services that treat the symptoms of ASD, the caps violate MHPAEA and do not follow the generally accepted standards of care for ABA. The Coalition just signed a letter to DOI encouraging them to issue a bulletin to insurers to remove caps. We are also working on a budget amendment to address these concerns.

### FUN FACT: COST SURVEY RESULTS FOR DELIVERING ABA SERVICES

The Coalition's cost survey results showed technicians spend 18% of their time providing indirect treatment activities. Per the ABA CPT code set, indirect activities are not billable but are considered bundled into the overall reimbursement rate for face-to-face time in 97153. Our cost survey projected reimbursement rates to cover our cost that aligned with Medicaid's Milliman actuarial rate determination results.

### MHPAEA – THE DEPARTMENT OF LABOR (DOL) IS WORKING HARD FOR ACCESS TO ABA.

The Mental Health Parity and Addiction Equity Act (MHPAEA) prohibits imposing any treatment limitation on the scope or duration of treatment for mental health conditions that are not imposed on substantially all outpatient medical care.

*In 2022, what was the number one treatment limitation DOL found in insurers' coverage plans? Answer: Limitation or exclusion of applied behavior analysis therapy or other services to treat autism spectrum disorder.*

*In 2023, DOL worked with a very large company to remove a blanket ABA restriction from all its nearly 1,000 self-funded client plans across the country. Because of those efforts, over 1,000,000 plan participants have coverage for ABA.*

*In 2024, DOL made it clear that parity law protections follow the diagnosis, no matter which side of coverage the health plan places it. This means that ASD has parity protections if it is placed on either the medical/surgical or behavioral health side of the plan's benefits.*

*The Ohio Autism Insurance Coalition formed in April 2017 and consists of over forty-eight autism service providers throughout the state. We partner together to build service capacity and ensure access to treatments for individuals with autism. Please join us!*

## WHAT ARE TREATMENT LIMITATIONS WITHIN MHPAEA.

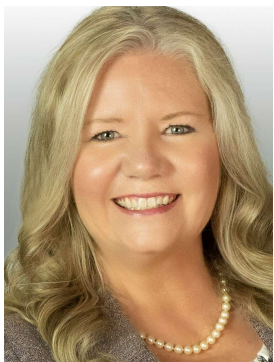
Quantitative Treatment Limitations (QTLs) are numerical limits placed on healthcare benefits on mental health and addiction care. Examples of QTLs are maximum number of treatment hours allowed, annual visit limits, and episode-based visit limits.

Non-Quantitative Treatment Limits (NQTLs) are non-financial restrictions on mental health and addiction care. Examples of NQTLs are overly restrictive utilization management criteria, network admission standards, a lengthy, overburdensome prior authorization process, age caps, requirement to receive a lower intensity treatment first (fail first), and insufficient reimbursement rates causing an inadequate provider network.

### Did you know that only 8% of children with ASD enrolled in Medicaid health insurance are getting access to ABA?

In the summer of 2024, our Coalition teamed up with OHABA, the Autism Society of Ohio, and Autism Speaks to create a white paper on the urgent need to solve access challenges in Medicaid. We met with state legislators and were thrilled how many called Medicaid on behalf of their constituents. It wasn't long, ODM announced the draft rules for ABA. Unfortunately, we still have seven MCOs with seven different medical policies for ABA until July 2025.

You can read our two-page white paper on our Blog page at [asdohio.com](http://asdohio.com).



*Please reach out so we can introduce ourselves to you. We want to learn about your organization as well.*

*-Marla Root*

## Medicaid's ABA Draft Rules and Rates Announced last November, most likely coming July 1<sup>st</sup>.

*This past November, ODM opened stakeholder feedback on their draft rules and reimbursement rates for ABA services. We were very pleased with many aspects of the rules, including reimbursement rates. We would like to see ODM allow quicker access to ABA services by reducing diagnostic requirements, by creating other paths for diagnosis, including allowing other licensed qualified health professionals with ASD testing tools in their scope of practice, to diagnose. This would better align with how other mental health conditions are diagnosed.*

*We would also like to see technicians that have completed training and passed the competency assessment be allowed to become billable, while they wait to take the certification exam and receive results.*

*Read the Coalition's full stakeholder feedback on our website under the Blog tab and get access to the November draft rules and reimbursement rates.*

*At this point, we do not believe ODM will make the April deadline for the release of the final rules. We are unsure if they will revise the draft rules and allow another stakeholder feedback period. We suspect it could be July 1<sup>st</sup> before we see finalized rules.*

Check us out and follow our blog! [www.asdohio.com](http://www.asdohio.com)