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August 18, 2023

Dr. Daniel Rusyniak, Secretary
Indiana Family and Social Services Administration
402 W. Washington Street
Indianapolis, IN 46207

Dear Secretary Rusyniak,

As the Chair of the Intellectual and Developmental Disabilities Task Force, I write today to express my significant concerns regarding the recently proposed reimbursement rates for Applied Behavior Analysis (ABA) therapy from the Office of Medicaid Policy and Planning (OMPP).

After conducting a cost survey of ABA providers that showed an average rate of \$91 per hour, OMPP announced that their proposed therapy reimbursement rate was \$56 per hour, a dramatic reduction that is significantly below provider's costs according to the agency's own survey.¹ Following multiple stakeholder meetings in which providers presented data showing the proposed rates to be significantly below the costs of providing service, OMPP responded by proposing rates even lower than they had initially proposed.

As you know, ABA therapy and other therapeutic treatments offered to children with Autism Spectrum Disorder (ASD) can be life-changing, both for these children and their impacted families. However, as you also know, our state's supply of ABA services is unlikely to meet demand in the foreseeable future. Most ABA providers in the state have significant waitlists, with hundreds of children awaiting treatment. Setting a reimbursement rate that inhibits providers' ability to recruit and retain essential staff will imperil the availability and quality of care provided to children in need.

¹ Applied Behavioral Analysis Therapy Services Reimbursement Review, Indiana Family and Social Services Administration Office of Medicaid Policy and Planning, August 8, 2023, <https://www.in.gov/fssa/files/ABAReimbursement-ProviderMeetingAugust2023.pdf>.

ABA therapy is most impactful when provided to children early in life, so the impact of such shortages is serious and long-ranging for individual patients and for our state. Research has demonstrated the cost of lifelong care for an individual with ASD can be reduced by two-thirds with early diagnosis and intervention. Longer wait times for services can push patients out of the “early diagnosis and intervention” window, resulting in increased cost burdens for our families, schools, and health systems.


If the proposed rate is adopted, I am fearful that ABA providers will no longer be able to serve the already underserved Medicaid community in Indiana, and children with ASD will experience greatly diminished access to care when they are at their most vulnerable.

I appreciate the need to be good stewards of taxpayer dollars in an area in which costs have grown rapidly. I support, as does the provider community, implementing a fixed fee schedule. However, this fee schedule must accurately reflect the cost of providing essential services, while acknowledging that a significant part of the increased expense is due to a doubling of autism diagnoses in children since 2010. We have a responsibility to spend money wisely and prudently, but also to ensure appropriate care at a time in children’s development in which high quality care can make a difference for the rest of their lives.

I am committed to continuing this important discussion with you and look forward to upcoming conversations as we work together to ensure Hoosier children with ASD receive the access to quality care they deserve.

This issue is too important to Hoosier families to get wrong. Let’s take the time to get it right. To that end, I am requesting that you delay any further action to finalize the proposed rates until a thoughtful consensus on an appropriate rate can be reached between FSSA, legislators, the provider community and those being served. Rate cuts that could reduce the quality and availability of care, potentially endangering positive outcomes for vulnerable children, would not serve Indiana’s families or taxpayers in the positive way we all seek.

Sincerely,

A handwritten signature in black ink that reads "Suzanne Crouch". The signature is written in a cursive, flowing style.

Suzanne Crouch
Lieutenant Governor of Indiana