



## National Coalition for Access to Autism Services

March 10, 2020

The Honorable Thomas McCaffery  
Assistant Secretary for Health Affairs  
U.S. Department of Defense  
1200 Defense Pentagon  
Room 3E1070  
Washington, DC 20301

**RE:** Emergency Approval of Telehealth for Autism Care Demonstration Services

Dear Secretary McCaffery:

On behalf of the National Coalition for Access to Autism Services (NCAAS), I am writing today to request that the Department of Defense restore the use of telehealth services in the Autism Care Demonstration on an interim, emergency basis in response to the current public health crisis. As Vice President Mike Pence noted at a briefing today, private insurers have “agreed to cover telemedicine so that anyone, particularly among the vulnerable senior population, would not feel it necessary to go to a hospital or go to their doctor. They’ll know that telemedicine is covered.” Additionally, telehealth can be a tool in limiting the spread of COVID-19 by reducing healthcare providers contact with multiple patients at a time when social distancing has become a specific tool in limiting community spread. For that reason alone, it would be very beneficial to TRICARE patients and their families to permit coverage of telehealth for the provision of applied behavior analysis (ABA) for the duration of this public health crisis.

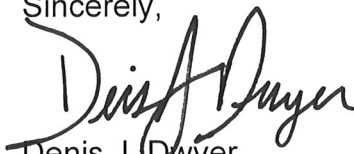
When the Defense Health Agency (DHA) adopted the new Category I CPT Codes in 2019, it failed to adopt all the American Medical Association codes for ABA services. This eliminated the prior practices of TRICARE contractors to reimburse for the provision of certain ABA services using telehealth. Eliminating the use of telehealth has had a direct impact on TRICARE patients, substantively reducing access to ABA services at remote military locations. In addition, telehealth has become a tool to address the current public health crisis, not only as described by the Vice President above, but also in the recently enacted Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020 signed by the President last Friday that provided interim relief from the limitations on the use of telehealth for Medicare beneficiaries for the duration of this healthcare crisis.

Board Certified Behavior Analysts (BCBA) that provide the direction of ABA services for children diagnosed with autism are currently in and out of patients' homes as much as 5 - 15 times per week depending on their caseload. In a clinical setting, several patients

depending on their caseload. In a clinical setting, several patients are in one place, often for an extended period of time as they receive individualized therapies. In addition to today's announcement by the Vice President, virtually all other insurers, be it Medicaid, CHIP, or commercial insurers, permit the use of telehealth in the delivery of ABA services. Military families could be at greater risk for exposure to the coronavirus compared to the civilian population who will be able to rely on the use of telehealth services.

Thank you for your consideration of this request, Mr. Secretary. NCAAS members are committed to serving military families that have children with autism spectrum disorder and ensuring they continue to have access to services. Please do not hesitate to reach out if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Denis J. Dwyer". The signature is fluid and cursive, with the first name "Denis" being the most prominent.

Denis J. Dwyer  
Executive Director