



## **National Coalition for Access to Autism Services**

December 9, 2020

### **NCAAS URGES THE INCLUSION OF ABA PROVIDERS AS HEALTH CARE PERSONNEL FOR COVID-19 VACCINE PRIORITIZATION**

As the authorization of a vaccine for COVID-19 becomes close to reality, state health departments are making decisions on how to prioritize the administration of initial doses. The National Coalition for Access to Autism Services (NCAAS) urges state health departments to consider the unique risks Applied Behavior Analysis (ABA) providers encounter treating patients affected by autism spectrum disorder (ASD), including the close proximity often required for intervention and support. NCAAS encourages states to adopt the broad definition of health care personnel recommended by the Advisory Committee on Immunization Practices (ACIP) to ensure behavior analysts and behavior technicians are included in the definition of health care providers who should be prioritized for the vaccine.<sup>1</sup> The definitions cited by ACIP are broad, recognizing the breadth of the health care personnel workforce needed to provide medically necessary health care treatment, including the services of behavioral health care providers.

NCAAS is a nonprofit organization representing autism treatment providers and the hundreds of thousands of children and families they serve in every state of America who are affected by ASD. NCAAS providers have more than 168,000 employees nationwide and contract with TRICARE, public schools, Medicaid, CHIP, state and local payors, and commercial insurers to provide essential, medically necessary treatment to patients of all ages, although the vast majority of patients are children.

The primary, gold standard treatment for ASD is ABA. It is provided by behavior analysts who design the treatment plan and oversee the work of behavior technicians who provide the day-to-day therapy working directly with patients. Therapy may be provided in a variety of settings, including in-person treatment at a clinic, patient's home, school, or community. Each member of the treatment team is vital for the provision of medically necessary therapy to patients with ASD. It is critical they are able to stay healthy. In addition, ABA provider shortages are pervasive throughout the country, so the loss of any provider to illness or necessary quarantine due to exposure will have a serious impact on access to treatment.

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<sup>1</sup> Centers for Disease Control and Prevention, "The Advisory Committee on Immunization Practices' Interim Recommendation for Allocating Initial Supplies of COVID-19 Vaccine — United States, 2020," *Morbidity and Mortality Weekly Report*, Vol. 69 (Dec. 3, 2020), <https://www.cdc.gov/mmwr/volumes/69/wr/pdfs/mm6949e1-H.pdf>. See also Advisory Committee on Immunization Practices, "Allocation of initial supplies of COVID-19 vaccine: Phase 1a" (Dec. 1, 2020), <https://www.cdc.gov/vaccines/acip/meetings/downloads/slides-2020-12/COVID-02-Dooning.pdf>.

Because of the 1:1 nature of treatment and the fact that many patients are children, physical distancing is not possible, and proper hygiene can be difficult to maintain. Many patients with ASD also have other underlying health conditions, placing them at greater risk if they were to be exposed to COVID-19. Of significant note is the fact that at this time, there is no vaccine available for children. While some clinical trials are beginning for children ages 12 and up, even if approved, this will still leave many children with ASD ineligible for a COVID-19 vaccine. This expected gap in the vaccination of children younger than 12 makes it even more critical that ABA providers, whose patients are often very young children, are included with other health care personnel in the first phase of vaccination to protect *both* providers and patients and their families.

NCAAS members remain committed to serving all patients with ASD and their families. We strongly urge states to ensure behavioral health providers *including* ABA providers are encompassed in definitions of health care personnel for the purpose of priority vaccine distributions.