

## ABA Public Comment

On the bottom of page 13, top of page 14 add “DD Waiver” to the list of “may be provided in coordination with other medically necessary services.” Add after the sentence on the EPSDT program that ABA is also a covered benefit for adults.

On page 16 – #4 why are the criteria for other providers specified, but not for “behavior technician”?

On page 17 – why is the “at risk” age taken out? One cannot be “at risk” for autism indefinitely. “At risk” is usually a clinical category up to age three.

On page 19 –#6 is unclear. What does “residential facility” mean? Since #7 uses “residential treatment center” it must be different. Is a “residential facility” a nursing home, a DD Waiver supported living home? Or is a “residential facility” either a residential treatment center, accredited residential treatment center, or a group home? That is implied, but not stated, in #7. How could a “facility” “specialize in or has as part of its treatment modalities MAD ABA services,” and not be a stage two and three provider, as stage 1 is not treatment?

On page 19 - #7 isn’t clear either. “An eligible recipient who meets the criteria for ABA services who is in a residential treatment center, accredited residential treatment center, or a group home may receive ABA services to the extent that the residential provider is unable to provide the services.” Are residential treatment centers and group homes expected to provide ABA?

On page 20 – #2 there is now no maximum age for ABA services

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