



EHB Benchmark Plan Selection

In Support of Adding Coverage for Applied Behavior Analysis (ABA)

March 28, 2023

Commissioner Vicki Schmidt
Kansas Insurance Department
1300 Arrowhead Dr.
Topeka, KS 66604

Dear Commissioner Schmidt,

My name is Mike Wasmer, and I am the Chief Operating Officer for the Council of Autism Service Providers (CASP). CASP is a non-profit trade association of autism service provider organizations that have demonstrated a commitment to providing evidence-based services, such as applied behavior analysis (ABA), to individuals with autism.

I am a resident of Olathe and the father of a young adult with autism. On behalf of CASP and personally, as a past consumer of ABA services and an advocate for Kansas families impacted by autism, I strongly support the Lewis & Ellis recommendation to add coverage for ABA for the treatment of autism to the Kansas Essential Health Benefit (EHB) Benchmark.¹

As of 2019, coverage for ABA services for the treatment of autism is required in most fully insured health benefit plans in all 50 states. Additionally, coverage for ABA is required in all Federal Employee Health Benefit plans, the majority of self-funded health benefit plans, and under the Early and Periodic Screening, Diagnostic and Treatment (EPSDT) benefit of Medicaid in all 50 states.

The current Kansas EHB Benchmark Plan is discriminatory because it does not cover the standard and essential treatment for autism, i.e., ABA. The analysis performed by Lewis and Ellis demonstrates that adding coverage for ABA to the Kansas EHB meets all of the key actuarial requirements outlined by CMS, including typicality and generosity standards. I encourage the Kansas Insurance Department to include coverage for this important treatment in the Kansas EHB Benchmark.

Thank you for pursuing the grant to conduct the actuarial analysis and for considering my comments.

A handwritten signature in black ink, appearing to read 'mwasmer', with a long, sweeping flourish extending to the right.

Michael Wasmer
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¹ <https://insurance.ks.gov/documents/healthlife/ehb/EHB-recommendation.pdf>