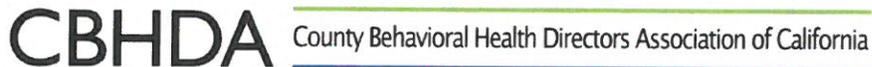


CMHDA & CADPAAC are now



September 9, 2014

Ms. Rene Mollow, Deputy Director
Ms. Margaret Tatar, Acting Deputy Director
Department of Health Care Services
1501 Capitol Avenue
Sacramento, California 95899

SUBJECT: Interim Policy for the Provision of Behavioral Health Treatment Coverage for Children Diagnosed with Autism Spectrum Disorder – Draft All Plan Letter 14-XXX

Dear Ms. Mollow and Ms. Tatar:

On behalf of the County Behavioral Health Directors Association of California (CBHDA), which represents the public mental health and substance use disorder programs in counties throughout California, I offer its perspective on the *Interim Policy for the Provision of Behavioral Health Treatment Coverage for Children Diagnosed with Autism Spectrum Disorder – Draft All Plan Letter 14-XXX*.

Effective treatment for children with Autism Spectrum Disorder (ASD) can measurably improve physical and mental development. CBHDA supports increased access to effective interventions for individuals with ASD, specifically those that can be implemented within community settings. CBHDA supports the Department of Health Care Services' (DHCS) commitment to improving the service delivery system for people with ASD and their families evidenced by the draft All Plan Letter (APL) that outlines the DHCS' interim policy guidance to managed care plans for the coverage of Applied Behavioral Analysis (ABA) effective September 15, 2014.

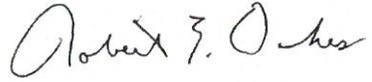
CBHDA is encouraged by DHCS' efforts to respond to recent guidance provided by the Centers for Medicare and Medicaid Services (CMS) related to Medicaid coverage of services to children with autism, while also recognizing that important policy and beneficiary access considerations will need to be addressed. CBHDA welcomes the opportunity to work with DHCS and managed care plan representatives to fully explore beneficiary access and other policy considerations, particularly related to system crossover.

Medi-Cal beneficiaries receive comprehensive, high quality behavioral health services, including Early and Periodic Screening, Diagnostic and Treatment (EPSDT) services when productive collaboration occurs between DHCS, managed care plans, and county mental health plans. A robust continuum of care for Medi-Cal beneficiaries with ASD and their families only results from collaboration, assuring timely access to (and coordination of) emergency, inpatient, and outpatient treatment.

CBHDA appreciates DHCS' continued commitment to California's community behavioral health care system and welcomes the opportunity to work with DHCS to strengthen the health care delivery system for Medi-Cal beneficiaries with ASD and their families. Please do not hesitate to contact me (roakes@cbhda.org) or Molly Brassil (mbrassil@cbhda.org) with any questions.

CBHDA Comments to DHCS on Draft Interim Policy for the Provision of BHT for Children
Diagnosed with ASD – September 8, 2014

Sincerely,



Robert E. Oakes
Executive Director
County Behavioral Health Directors Association of California

Cc. Toby Douglas, Director, DHCS
Mari Cantwell, Chief Deputy Director, DHCS
Karen Baylor, Deputy Director, DHCS
Brenda Grealish, Chief, DHCS
Laurie Weaver, Chief, DHCS
Sarah Brooks, Chief, DHCS
Abbie Totten, California Association of Health Plans
Kelly Brooks, California State Association of Counties