

February 7, 2025

Oregon House of Representatives
House Health and Social Services Committee
RE: HB 2023

Dear Members of the House Health and Social Services Committee,

Thank you for your service to the state of Oregon and your participation in the House Health and Social Services Committee. I write today on behalf of The Council of Autism Service Providers (CASP). CASP is a non-profit trade association of autism service provider organizations, with a demonstrated commitment to promoting and delivering evidence-based practices for individuals with autism. CASP represents the autism provider community to the nation at large, including government, payers, and the general public. CASP provides information, education, and promotes the generally accepted standards of care for applied behavior analysis (ABA). CASP is committed to addressing barriers that impact access to quality services delivered by qualified providers.

We urge you to pass HB 2023. HB 2023 recognizes the applicability and medical necessity of ABA services for intellectual and developmental disorders in the current edition of the diagnostic and statistical manual (DSM V- TR) and requires coverage for these diagnoses, in addition to autism spectrum disorder (ASD).

Passing autism insurance coverage resulted in meaningful access to medically necessary care and services for children and youth across the state. However, children with related conditions, including intellectual disabilities, Down syndrome, and rare genetic conditions have been unable to access ABA therapy.

Individuals should be able to access medical care, regardless of their primary diagnosis, as long as the services are medically necessary. Expanding coverage beyond ASD is consistent with recent federal guidance for state medicaid officials and is consistent with recent legislation in other states.

CASP recommends the language within HB 2023 be updated to reflect Mental Health Parity and Addiction Equity Act (MHPAEA) requirements including the removal of hard caps or limits on the number of hours authorized per week, age of diagnosis requirements. The Oregon Department of Insurance addressed parity concerns in the following DOI bulletins and letters: 2014-01, 2014-02,

FAQ related to Mental Health Parity and Autism Spectrum Disorder Bulletins, and the November 14, 2014 letter from Commissioner Cali. Finally, following the AF v Providence lawsuit, the Oregon Department of Justice published a legal opinion declaring that the 25 hours per week had to be treated as a floor, not a ceiling.

Please consider the important edits recommended above to align this bill with state and federal MHPAEA requirements and then pass HB 2023 from Committee. Thank you for your time and your service to the great state of Oregon.

Sincerely,



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