



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

March 29, 2016

John O'Brien
Director, Healthcare and Insurance
U.S. Office of Personnel Management
1900 E Street, NW
Washington, DC 20415

Re: *Federal Employees Health Benefits Program Call Letter (Letter No. 2016-03)*

Dear Director O'Brien:

On behalf of the Consortium for Citizens with Disabilities (CCD) Task Force on Health and Task Force on Developmental Disabilities, Autism, and Family Support, we write to thank the Office of Personnel Management (OPM) for directing Federal Employees Health Benefits (FEHB) Program carriers not to exclude coverage of applied behavior analysis (ABA) for the treatment of autism spectrum disorders in the 2017 plan year. We applaud OPM's decision to expand ABA benefits and commend the work of Dr. Christine Hunter, Rhoda Schulzinger, and others at the agency.

The CCD is a coalition of over 100 national disability organizations working together to advocate for public policy that ensures the self-determination, independence, employment, integration, and inclusion of children and adults with disabilities in all aspects of society. The Health Task Force works on all the issues encompassed in the very broad term "health," with specific emphasis on public and private health insurance. The Developmental Disabilities, Autism, and Family Support Task Force has as its mission advocating for federal public policies that directly relate to individuals with developmental disabilities, autism spectrum disorders, family supports and the prevention of child abuse and neglect. Jointly, our task forces support policies that improve the healthcare of individuals on the autism spectrum.

As the call letter notes, OPM has since 2013 encouraged FEHB plans to offer ABA benefits for children with autism spectrum disorders. But gaps in coverage have persisted within FEHB, and many have not been able to access an ABA benefit. The new policy requiring appropriate coverage of ABA treatment by all FEHB plans is both necessary and welcome. We hope that it will serve as a catalyst for other health plans to cover such evidence-based treatments for individuals with autism spectrum disorders, improving the quality of life for our families, neighbors, and friends.

Sincerely,

Autism Society of America
Autism Speaks
American Academy of Pediatrics
American Association on Health and Disability

Madison House Autism Foundation
National Association of State Directors of Special Education
National Respite Coalition
The Arc