



April 20, 2021

Submitted via Email: BronnaKahle@house.mi.gov

The Honorable Bronna Kahle
Anderson House Office Building
N-991 House Office Building
Lansing, MI 48933

Re: **House Bill 4657 -- OPPOSE**

Dear Representative Kahle:

I am writing on behalf of the Center for Autism and Related Disorders (CARD), the world's largest organization treating autism spectrum disorder (ASD) and the nation's third largest non-governmental organization contributing to autism research. CARD provides services to thousands of individuals of all ages at more than 200 locations in 26 states, including two locations in Michigan. In my capacity at CARD, I also serve as a member of Michigan's Autism Services Legislative Workgroup and am the chair of the ABA Billing Codes Commission, headquartered in Portage, Michigan. CARD is grateful for your commitment to the patient population we serve and for all you do to ensure the House is focused on the needs of vulnerable constituents. We are also thankful for the ongoing efforts of your staff to hear our concerns.

Unfortunately, CARD must **oppose HB 4657** because it has the potential to upend access to autism treatment in Michigan by expanding the definition of "treatment" in Michigan's autism insurance reform statute to include "parent implemented model of intervention." In its current form, the language in HB 4657 makes no distinction between "parent implemented model of intervention," which represents only a fraction of the medically necessary treatment a child with autism spectrum disorder needs, and the other forms of treatment delineated in Sec. 3406s (7)(l).

HB 4657 Seeks to Require Services that Are Already Mandated: Services provided in a "parent implemented model of intervention" are already mandated under Insurance Code Sec. 3406s (7)(l)(i), (iv) and (v) of Michigan's autism mandate when clinically appropriate, but they are only a small component of a behavioral health treatment model meant to supplement a full treatment program and not intended as a stand-alone treatment.

HB 4657 Would Confuse Insurers and Health Plans: Insurers and health plans would likely view "parent implemented model of intervention" as an alternative way to comply with Michigan's autism mandate, authorizing only the parent implemented model of intervention, rather than a full treatment plan delivered by highly trained professionals. As a result of the proposed language, consumer choice could be limited to this one component of treatment, rather than a full-fledged treatment plan.

Research Shows Parent-Led Treatment Is Less Effective and Costs More: Research has repeatedly demonstrated that parent-led treatment of autism is significantly less effective than treatment implemented by trained professionals (Smith, et al., 2000). In fact, the single study on Play Project urges caution, saying that the results of the study do not make sense clinically and that the study needs to be replicated (Solomon, Van Egeren, Mahoney, et al., 2014). That publication elicited an objection from authors cited in the study, saying their work had been mischaracterized, which further supports the scientific method that would call for replicating the results of the Play Project study. If children are diverted to a parent implemented model with weak evidence of effectiveness when they need ABA, they will be deprived of the opportunity to fulfill their potential. The lifetime cost of not treating autism spectrum disorder

effectively has been estimated at \$3.2 million per capita (Ganz, 2007), and most of those costs are borne by taxpayers as children require additional services and supports in school and are less likely to become independent adults.

Thank you for your commitment to Michigan's autism community. Our goal is to support your efforts, and we would welcome the opportunity to work with you on a bill to help the autism community and contribute to access to mental health services. Should you have any questions or require additional information, do not hesitate to contact me via email at J.Kornack@centerforautism.com or directly at (818) 345-2345, extension 1070.

Respectfully submitted,



Julie Kornack
Vice President, Government Relations