



T H E M I L I T A R Y C O A L I T I O N

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November 19, 2007

The Honorable S. Ward Casscells M.D.
Assistant Secretary of Defense for Health Affairs
1200 Defense Pentagon, Room 3E1082
Washington, DC 20301-1200

Dear Secretary Casscells,

The Military Coalition, a consortium of nationally prominent uniformed services and veterans organizations representing more than 5.5 million current and former members of the seven uniformed services, plus their families and survivors, would like to express our appreciation for the completion of the Congressionally-mandated report on the provision of services to military dependent children with autism under the Enhanced Care Health Option (ECHO) program. Military families with autistic children face many challenges in coordinating the care their children need from medical, educational, and local social services programs. These challenges are exacerbated by frequent military-ordered moves and by the deployment of the service member parent.

The Coalition applauds the planned implementation of the demonstration project outlined in the report to increase access to care through the use of the corporate model relative to Applied Behavior Analysis (ABA) providers. We hope there will be no delay in initiating this action and we look forward to learning more about this demonstration.

While we are pleased with the proposed improvements regarding how ABA therapy will be reimbursed under ECHO, the Coalition is concerned the report was so narrowly focused and that the Department chose to concentrate only on the provision of ABA therapy and not on related issues regarding access to care under ECHO. While ABA therapy is certainly the therapy with the most scientific validation, the Coalition is concerned the report did not address other types of therapy that might be covered if ABA is not available. Nor did the report address the significant problems families face in coordinating the TRICARE and ECHO benefits with services provided through other agencies. Families have asked for a plan to address and resolve the continuity of care issues experienced across duty stations. While awareness of families' difficulties in obtaining coverage of ABA therapy was the prime reason for the Congressional interest that resulted in the inclusion of Section 717 in the FY 2007 National Defense Authorization Act, the Coalition notes that Section 717 did not specifically mention ABA. We believe the Congressional mandate calling for the Department of Defense (DoD) to "develop a plan to provide services to military dependent children with autism" speaks to a broader issue than simply ABA therapy.

The Coalition is concerned the report does not address some of the key issues raised by the parents selected to provide input and those who submitted e-mail comments. The Coalition is also concerned the timeline for the implementation of the recommendations has not yet been announced. Following are several additional issues we feel strongly should have been addressed in the report and acted upon by DoD:

- The Coalition believes a discussion should have been included on whether it would be appropriate for the Department to implement a policy change making a diagnosis of Autism Spectrum Disorder (ASD) an additional and distinct qualifying condition for entry into the ECHO Program.
- The Coalition believes the report should have addressed whether the current monthly reimbursement limit of \$2,500 is sufficient to cover needed therapy. As you are aware, ABA therapy is a scientifically-validated treatment that is most beneficial with intensive use. The legal limit of \$2,500 per month for services under ECHO is discussed in the report, but no analysis is provided indicating whether this amount is sufficient to cover what might be the optimal number of therapy hours prescribed by physicians. Coalition members have heard from families that the cost of the therapy hours required each week for maximum benefit for the child would exceed the \$2,500 limit, especially for families who are unable to access other services in the community.
- Families and military leaders have asked DoD to address the medical necessity of behavior intervention (specifically ABA) to treat the disabling effects of ASD and improve a child's quality of life and potential to function safely and independently within their community. The Coalition believes this is a valid position warranting further discussion.
- The Coalition believes the ability for a family to qualify for respite care should not be contingent on receipt of other services provided under ECHO during that month. Enrollment in ECHO should be the only qualifying factor for respite care.

As stated, the Coalition believes this report is a good first step. But, it is a long way from the development of a comprehensive plan to meet the needs of military families with autistic children, even under the limited parameters of the ECHO program. We hope DoD will continue to identify policy and programmatic changes needed to ensure our family members with ASD can receive the appropriate level of care.

ASD has become an increasing concern to our military leadership and military families. The Coalition firmly believes that the support we provide our service members and their families, particularly as expressed in policy decisions relating to health care, is essential to the near and long term readiness of our Armed Forces. We look forward to a continuing dialogue on these issues and offer our assistance with this important work to improve support for these vulnerable military families.

Thank you for your consideration and hearing our concerns.

The Military Coalition

(Signatures enclosed)

cc:

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