



**House Bill 627: Maryland Medical Assistance Program – Registered Behavior Technicians
– Reimbursement**

Health and Government Operations Committee

February 23, 2022

POSITION: SUPPORT

Dear Chair Pendergrass and Members of the Committee:

Pathfinders for Autism (PFA) is Maryland’s largest autism organization dedicated to helping individuals, parents, and professionals find resources, support, and training while working to increase the awareness of autism spectrum disorders. We accomplish this through a variety of programs and services, all of which are offered FREE of charge. Last year our programs served over 20,000 Maryland residents.

PFA supports HB627 which seeks to remove the requirement that a technician working under the direction of a Board-Certified Behavior Analyst hold a certification as a Registered Behavior Technician (RBT) in order to bill Medical Assistance for Applied Behavior Analysis services (ABA). ABA is a common behavioral health therapy that helps people with autism reach their full potential in areas including communication, education, employment, independent living, and life satisfaction. Some children may require intensive ABA therapy, up to 40 hours per week.

One in 49 Maryland children are diagnosed with an autism spectrum disorder (ASD)¹. There are over 13,400 children in Maryland public schools with an ASD diagnosis². One-quarter of children in Maryland are covered by Medicaid³. The requirement that the technician be certified as an RBT prior to the child receiving services is NOT clinically necessary or appropriate and is NOT a typical requirement under private insurance policies sold in Maryland.

This requirement creates yet another systemic barrier in access to medical treatment for thousands of the most vulnerable children in our state. Beyond the issue of equity, this requirement is fiscally irresponsible as it impedes access to treatment that may reduce or eliminate the child’s need for special education services and/or adult service programs covered by the state.

The requirement that a technician hold an RBT certification to bill Medical Assistance for services creates a burden on the provider that is not clinically necessary nor in line with the Standards of Practice for the tiered delivery model of ABA therapy. Furthermore, it creates inequity in access to medical care between those with private insurance sold in Maryland and recipients of Medical Assistance.

¹ <https://www.cdc.gov/ncbddd/autism/data.html>

² <https://www.marylandpublicschools.org/about/Documents/DCAA/SSP/20202021Student/2021SpecialEducationCensusData.pdf>

³ <https://www.medicaid.gov/state-overviews/scorecard/percentage-of-population-enrolled-medicaid-or-chip-state/index.html>



The requirement results in excessive delays for children in receiving service and repeated gaps in service delivery when staff turnover occurs. PFA hears from families who have waited three, six, or even twelve months to start services because there are limited ABA providers that take Medical Assistance. The delay in starting services during early childhood development can adversely impact a child's long-term outcomes. Furthermore, families with medical assistance report routine gaps in services lasting as long as three months because of staff turnover, resulting in the child losing the gains in life skills they have achieved. The cycle of delays and gaps in ABA services for children on medical assistance is yet another example of healthcare inequity perpetuated by Maryland Medicaid.

Nothing about this requirement makes clinical, business, equitable, or fiscal sense. I respectfully ask that you vote in favor of HB 627 to create greater access to medical treatment for the growing number of children with autism in our State. For more information, please contact Rebecca Rienzi, Executive Director, Pathfinders for Autism at 443-330-5370 or rrienzi@pathfindersforautism.org.

Sincerely

A handwritten signature in black ink that reads "Rebecca Rienzi". The signature is written in a cursive, flowing style.

Rebecca Rienzi
Executive Director