



September 19, 2019

Jami Snyder, Director  
Arizona Health Care Cost Containment System  
801 E. Jefferson Street  
Phoenix, AZ 85034

RE: Applied Behavior Analysis Proposed Policy

Dear Ms. Snyder:

On behalf of the American Speech-Language-Hearing Association, I write to recommend an amendment to the proposed applied behavior analysis (ABA) policy, which includes treatment for communication.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 204,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,100 ASHA members reside in Arizona.

The proposed Arizona Health Care Cost Containment System Medical Policy Manual Section 320-S, III Policy, A, Applied Behavioral Analysis (ABA) services description includes the following section:

“ABA services are medically necessary when there are specific and objectively-defined target behaviors impacting the member’s development, communication, or ability to access or participate in their environment or community.”

ASHA recommends deleting the reference to communication in the proposed policy manual for the ABA services description. While ASHA supports the provision of ABA services to meet the behavioral needs of individuals with Autism Spectrum Disorder (ASD), the development of communication skills and treatment of communication disorders—including social communication disorders for individuals with ASD—is within the scope of practice of state licensed and ASHA certified speech-language pathologists (SLPs) in Arizona. SLPs play a central role in the screening, assessment, and treatment of individuals with ASD.<sup>1</sup>

### **Support for Individualized Treatment Options for Individuals with ASD**

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The Centers for Medicare & Medicaid Services (CMS) has indicated that treatment for speech, hearing, and language disorders for individuals with ASD are to be provided under the direction of an SLP or an audiologist.<sup>2</sup> CMS also states that ABA is only one treatment modality for ASD and that they do not endorse or require any single treatment modality for ASD.<sup>3</sup>

The U.S. Department of Education (the Department) identified ABA therapy as one methodology used to address the needs of children with ASD.<sup>4</sup> The Department reminded states and local programs that they must ensure that decisions regarding services are made based on the unique needs of each individual child with a disability and the child’s family in the case of Part C of the Individuals with Disabilities Education Act.

## **Speech-Language Pathology Professional Qualifications**

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SLPs are highly skilled professionals who, at minimum, hold a master's degree in communication disorders from an accredited program recognized by the Department. SLPs must complete a supervised clinical fellowship and pass a nationally standardized examination to earn certification (Certificate of Clinical Competence in Speech-Language Pathology). SLPs identify, assess, and treat a variety of communication disorders involving speech, language, fluency (e.g., stuttering), voice and resonance problems, cognitive communication disorders such as memory, attention and problem-solving disorders, and swallowing and associated feeding disorders. SLPs provide services for clients with ASD, based on their individualized needs, in a variety of practice settings ranging from schools to institutions such as hospitals and rehabilitation centers, early intervention programs, and private practice.

## **Audiology Professional Qualifications**

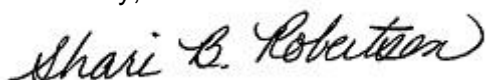
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Audiologists earn a clinical doctoral degree and are highly qualified to conduct comprehensive assessments that determine hearing loss, auditory function, balance and related systems, and evaluate, select, and dispense hearing aids. Audiologists also assess the candidacy of individuals with hearing loss for cochlear implants and work with medical teams to provide fitting, mapping, and audiologic rehabilitation to optimize the use of these devices.

ASD is a complicated disorder often requiring a team of skilled professionals to provide assessment and treatment. While ABA is often an appropriate treatment for behavioral aspects of ASD, SLPs are the professionals educated and trained to meet the communication needs of individuals with ASD. For this reason, ASHA recommends that references to communication in the ABA services policy manual be eliminated.

Thank you for considering ASHA's recommendation to remove communication from the ABA services policy manual. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).

Sincerely,



Shari B. Robertson, PhD, CCC-SLP  
2019 ASHA President

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<sup>1</sup> The American Speech-Language-Hearing Association. (n.d.). *Autism Spectrum Disorders*. Retrieved from [https://www.asha.org/PRPSpecificTopic.aspx?folderid=8589935303&section=Roles\\_and\\_Responsibilities](https://www.asha.org/PRPSpecificTopic.aspx?folderid=8589935303&section=Roles_and_Responsibilities).

<sup>2</sup> Department of Health & Human Services: Centers for Medicaid and Medicare Services. (2014). *Clarification of Medicaid Coverage of Services to Children with Autism*. Retrieved from <https://www.medicaid.gov/Federal-Policy-Guidance/Downloads/CIB-07-07-14.pdf>.

<sup>3</sup> Department of Health & Human Services: Centers for Medicare & Medicaid Services. (2014) *Medicaid and CHIP FAQs: Services to Address Autism*. Retrieved from <https://www.medicaid.gov/federal-policy-guidance/downloads/faq-09-24-2014.pdf>.

<sup>4</sup> The United States Department of Education: Office of Special Education and Rehabilitative Services. (2015). *Services Delivered to Children with Autism Spectrum Disorder*. Retrieved from <https://www2.ed.gov/policy/speced/guid/idea/memosdcltrs/dclspeechlanguageautism0706153q2015.pdf>.