



Commission on Services for Persons with Disabilities



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August 19, 2015

Michael Willden, Chief of Staff

101 North Carson Street

Carson City, Nevada 89706

Mr. Willden,

The CSPD is concerned with the recently released Medicaid rates for Applied Behavior Analysis, specifically the hourly rate for the Registered Behavior Technician (RBT) provider.

We believe the proposed rate will discourage quality companies or individual providers from participating in Medicaid. It has already been acknowledged there are not enough ABA providers currently in Nevada to serve all the Medicaid eligible children with Autism. In order for Nevada to compete, grow our own and draw new ABA Provider Companies and Board Certified Behavior Analysts to our state, the rate must be competitive with other states and private insurance.

Companies need to make a profit to stay in business and to continue to deliver high quality treatment. We want these businesses and the licensed BCBA's to want to practice in Nevada, not be enticed by other states to open shop in their state.

The current suggested rate for Nevada of \$29.80 is far below most national private insurance rates and recently proposed Medicaid rates for other states. Nevada ABA providers have already indicated this rate will not cover all the indirect costs associated with delivering quality treatment and allow them to make a small profit. Providers have already indicated that rate should be in the \$50 an hour range.

Nevada BCBA's have started credentialing their staff to become RBT's to follow new regulations effective July 1, 2015, mostly to support children utilizing private insurance now. Currently there are only 76 RBT's in Nevada. There are a total of 117 BCBA's and BCaBA's in Nevada, but not all are providing services to individuals with autism.

Nevada needs all of those BCBA's currently serving children with Autism and many, many more to participate in Medicaid. The hourly RBT rate will need to be comparable to other state rates and private insurance so Nevada has a chance to attract the providers necessary to serve all of the Medicaid eligible children with Autism. Medicaid eligible children should have access to the same quality of treatment as those able to private pay.

Thank you for your consideration.

Sincerely,

Brian Patchett, Chair

Commission on Services for Persons with Disabilities

CC: Richard Whitley, DHHS; Elyse Monroy, Governor's Office