

## Michigan Behavioral Analysis Provider (MiBAP) Association

To: Matthew Hambleton  
Bureau of Medicaid Policy, Operations, and Actuarial Services  
Medical Services Administration  
P.O. Box 30479  
Lansing, Michigan 48909-7979

Re: *MiBAP Comments, Project 1911–Autism (Extending Deadline for Certification of LP, LLP, QBHP Supervision of Behavioral Health treatment services beyond September 30, 2020)*

MiBAP is a non-profit membership organization of providers whose mission is to promote access to the science of applied behavior analysis (ABA) through advocacy, education, and quality practices. At its core, MiBAP is committed to providing the broadest possible access to *quality* ABA services across the State of Michigan. The question of extending the deadline for LP, LLP, and QBHP supervision of Behavioral Health Treatment is fundamentally an issue of balancing access, quality, and cost. The clinical role of directing treatment is of utmost importance in achieving outcomes for all children and families served. Without question, the quality of supervision directly impacts treatment outcomes. In a recent study by Dixon et. al., 2016, researchers examined the impact of supervisor qualifications on outcomes in the treatment of Autism Spectrum Disorder. The results indicated that “...a significant correlation was found, revealing that supervisors with BCBA certifications produce 73.7% greater mastery of learning objectives per hour as compared to supervisors without a BCBA.”

At the same time, the State of Michigan continues to experience a shortage of ABA professionals, particularly when compared to the ongoing waiting list for ASD-diagnosed children to receive ABA services. This is especially true for older (school-aged) children, where we believe there are still over one thousand individuals on Medicaid waiting lists across the state. Clearly, any policy that allows (or restricts) supervision by a broader set of mental health professionals must carefully balance the need for access with the need for quality, cost-effective ABA services.

MiBAP feels strongly that any change to current policy must be made only after a thoughtful and evidence-based data analysis of current practitioners providing supervision, combined with an analysis of current diagnostic and wait list trends. We believe that the state can achieve an appropriate balance in access to *quality* ABA services and supervision through the following approach and recommendations:

- MiBAP requests that the state analyzes and shares current statistics with respect to ASD diagnosis rates, ABA service waiting lists, average length of ABA service by supervisor type, numbers of Medicaid ABA supervision providers across the state (BCBA, BCaBA, LP, LLP, and QBHP), and to the extent possible, trends since 2013 regarding LP, LLP, and QBHP’s becoming BCBAs or BCaBAs. From this analysis, the state should determine a baseline estimate for the potential “gap” between individuals needing service and the anticipated number of individuals requiring ABA services in September 2020.

- Assuming a gap is predicted to remain as of September 2020, MiBAP would offer to work directly with appropriate state representative(s) to define and establish policy guidelines by which an LP, LLP, or QBHP could continue to provide *quality* ABA supervision. This might include (but is not limited to) requirements for ABA-specific course work and/or education levels, requirements for oversight by BCBA's, or requirements to remain on a path to BCBA certification or to achieve certification within a certain timeframe. These guidelines would be developed from the *data*, as well as other studies and evidence-based analysis previously performed. During this process, the state must also determine how the current policy, and any potential changes or extension to this policy, will be impacted by the January 2020 Michigan licensure requirement for behavior analysis services.

The quality of ABA supervision and ASD-related services in the state of Michigan is of utmost importance to MiBAP, and our member providers. We look forward to supporting MDHHS BHDDA in this critical endeavor.

Respectfully,



Michael F. Dow

President

Michigan Behavioral Analysis Providers (MiBAP) Association

