October 9, 2026

Detroit Wayne Integrated Health Network (DWIHN)
Attn: Provider Network Management / Contracting Department
707 W. Milwaukee Avenue
Detroit, MI 48202

Subject: Request for Information and Meeting Regarding ABA Provider Contracting, Communication Practices, and Service Delivery Requirements

Dear DWIHN Leadership Member,

On behalf of the Michigan Behavior Analysis Providers (MiBAP), we are writing to request information and the opportunity to meet regarding several concerns raised by our member organizations seeking to serve children and families within Wayne County.

MiBAP has been made aware of multiple providers who have successfully completed the approval and credentialing processes required to become authorized providers within the Wayne County network. Despite receiving approval, these providers have reported challenges in obtaining contracts that would allow them to begin delivering services to all eligible families, regardless of payor source. As a result, families actively seeking services are being directed to providers who are unable to accept referrals or initiate care due to the absence of executed contractual agreements.

Given the ongoing need for timely access to Applied Behavior Analysis (ABA) and behavioral health services, we would appreciate clarification regarding:

1. The process and timeline for approved providers to obtain service contracts.
2. Any current limitations on network expansion or provider onboarding.
3. Steps providers may take to facilitate the contracting process.
4. Opportunities for approved providers to begin serving eligible Wayne County residents.
5. The criteria utilized to determine network adequacy for ABA services.
6. How provider capacity, geographic access, waitlists, and family choice are evaluated when assessing network needs.
7. The process by which approved providers may seek reconsideration if contracting opportunities are delayed or unavailable.

In addition, several MiBAP members with existing contracts have expressed concerns regarding recently implemented supervision requirements, service delivery expectations, documentation standards, and communication practices. Providers share a commitment to maintaining high-quality, compliant services and therefore seek additional clarity regarding operational expectations and implementation requirements.

Of particular concern are reports from providers that policy guidance, operational directives, and provider notices have occasionally been communicated after the effective date of implementation. Providers have described situations in which letters or directives were distributed during the middle of a month while the associated requirements were applied retroactively to the first day of that same month. Such circumstances create significant challenges for providers who are expected to comply with evolving requirements without adequate notice, training, operational planning, or opportunity to seek clarification.

MiBAP members have conveyed that retroactive implementation of new requirements may create unnecessary administrative burden, increase compliance risk, and divert resources away from service delivery. More importantly, confusion regarding changing expectations can result in delays, interruptions, or limitations in access to medically necessary services for children and families.

To better understand and support compliance with DWIHN requirements, our members would appreciate clarification regarding:

1. New supervision requirements and implementation expectations, including flexibility in situations involving provider illness, staffing shortages, scheduling disruptions, and other unavoidable circumstances.
2. Service delivery standards, assessment and authorization requirements, and documentation expectations, including assessment hour limitations, reassessment requirements, service initiation timelines, authorization methodologies, and processes for addressing missed treatment hours due to circumstances outside of provider and family control.
3. Any recent policy changes affecting ABA and related behavioral health services.
4. Expectations for provider compliance, audits, quality monitoring activities, and provider performance metrics, including utilization expectations, census thresholds, referral acceptance, startup timelines, staffing measures, and related performance indicators
5. The process utilized to communicate policy and operational changes to providers.
6. Standard notice periods provided prior to implementation of new requirements.
7. Whether transition periods are available before enforcement activities begin.

8. How DWIHN addresses situations where provider guidance is issued after an effective date.
9. Opportunities for provider feedback and stakeholder engagement before significant operational changes are implemented.
10. Available channels for providers to seek clarification and receive timely responses regarding policy interpretations, support coordination responsibilities, the IPOS process, and communication among DWIHN, providers, families, and support coordination agencies.
11. The processes and expectations related to service coordination, including coordination between providers, support coordinators, and families, and efforts to promote timely communication and continuity of care.

MiBAP strongly believes that transparent communication, consistent implementation practices, and meaningful provider engagement are critical components of a successful provider network. Advanced notice of policy changes and reasonable implementation timelines allow providers to train staff, update procedures, ensure compliance, and continue delivering uninterrupted care to beneficiaries. These practices ultimately support shared goals of quality outcomes, regulatory compliance, and timely access to medically necessary services.

We believe an open dialogue between DWIHN and the provider community would be beneficial in addressing these questions and supporting continued access to services for children and families throughout Wayne County. We respectfully request a written response to the questions outlined above and the opportunity to schedule a meeting with members of your leadership, provider relations, contracting, and clinical operations teams to discuss these matters further.

Thank you for your consideration and for your continued commitment to serving individuals and families throughout Wayne County. We look forward to working collaboratively to strengthen provider partnerships, improve communication, expand access to care, and ensure families have timely access to medically necessary ABA services.

Sincerely,

Janna Ruedisale

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