



AUTISM SPEAKS®

June 22, 2018

Hon. R. Alexander Acosta, Secretary
U.S. Department of Labor
200 Constitution Ave. NW
Washington, DC 20210

Hon. Alex Azar, Secretary
U.S. Department of Health and Human Services
200 Independence Ave. SW
Washington, DC 20201

Hon. Steven Mnuchin, Secretary
U.S. Department of the Treasury
1500 Pennsylvania Ave. NW
Washington, DC 20220

Submitted electronically via E-OHPSCA-FAQ39@dol.gov

Re: Proposed guidance regarding nonquantitative treatment limitations (NQTLs) and disclosure requirements in connection with the Mental Health Parity and Addiction Equity Act (MHPAEA)

Dear Secretary Acosta, Azar and Mnuchin:

Autism Speaks is dedicated to promoting solutions, across the spectrum and throughout the life span, for individuals with autism and their families. As the nation's leading autism science and advocacy organization, we are deeply interested in your agency's work to implement section 13001(b) of the 21st Century Cures Act. Thank you for the opportunity to provide comments in response to the proposed guidance regarding NQTLs in connection with MHPAEA.

Autism Speaks has strongly supported increased efforts by the Departments to enforce MHPAEA protections for individuals with autism. We consistently have advocated to the Departments that more guidance should be issued that clarified MHPAEA protections specifically for individuals diagnosed with autism spectrum disorder and the treatments recommended by medical professionals. The proposed FAQs include guidance specifically related to the coverage of treatments for autism spectrum disorder which Autism Speaks strongly supports.

Specifically, Q2 includes a question and answer about the exclusion of applied behavior analysis (ABA) which is an evidence-based treatment for autism spectrum disorder. The proposed question and its answer specifically limits excluding ABA based on whether it is experimental or investigative as an NQTL. Autism Speaks strongly supports this guidance and the wording as proposed and we strongly urge you to finalize the language as written in the proposed FAQ.

We look forward to working with you to further improve coverage for individuals with autism spectrum disorders. If you have further questions please contact me at angela.ello@autismspeaks.org or 202-955-3111 ext. 58677.

Sincerely,

A handwritten signature in blue ink that reads "Angela Lello". The signature is written in a cursive, flowing style.

Angela Lello
Sr. Director for Public Policy