

I am reaching out regarding SB 2190 and the provision to expand ABA across populations. This is an issue that is close to our work at WFPS as we are the only district in ND that has billed ABA. As such, we have a unique understanding of the opportunities and challenges.

First, I want to thank you for bringing this to the floor. As a BCBA, these services are critical preventative interventions and can be life changing. We have seen the positive impact of ABA and believe that expansion beyond the autism diagnosis is much needed. We currently provide these services to students who have the need for this kind of intensive programming regardless of their diagnosis - and are only able to bill for those with autism. Expanding beyond the single diagnostic label would support us in obtaining reimbursement for services we are already providing for learners with high needs.

After reviewing the testimony from the previous committee hearing, I recognize the concerns that current language in the bill may be overly broad. Other states have addressed this issue by expanding ABA to specific diagnostic criteria (or even just specific diagnoses), including [Virginia](#)

and [Minnesota](#). While behavior analysis can support a wide range of issues, there may be need to narrow the scope of medically necessary services for the purposes of Medicaid reimbursement. I believe these examples can provide a good foundation for North Dakota's discussion on what populations to target for these valuable services.

While expanding the population beyond autism would better reflect the work being done, I want to be transparent and share that it may not actually lead to a dramatic increase in number of learners who can access these services. In the past few years of providing ABA, WFPS has found that the administrative barriers uniquely associated with ABA limit our ability to expand this service beyond a very narrow scope. These administrative barriers are not present in other IEP services like SLP, OT, and PT services. I have found in my research that other states have worked to reduce these barriers and am hoping that ND can take similar measures soon. ABA is a valuable early intervention tool and reducing administrative burden would support schools (and community agencies) to implement more efficient services.

Thank you for reading this email - please feel free to reach back out to me if you have any questions or would like to chat further about any of the topics I addressed. My cell is 701-261-0776.

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