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orig to Brian/John



OFFICE OF THE DIRECTOR

UNITED STATES  
OFFICE OF PERSONNEL MANAGEMENT  
WASHINGTON, DC 20415-0001

OCT - 7 2004

Mr. John Gage  
National President  
American Federation of Government Employees, AFL-CIO  
80 F. Street, NW  
Washington, DC 20001

Dear Mr. Gage:

This is in response to your recent letter concerning the Federal Employees Health Benefits (FEHB) Program. You asked that the Office of Personnel Management (OPM) direct FEHB Program carriers to provide coverage of Applied Behavioral Analysis (ABA) for the treatment of autism.

OPM's Insurance Services Programs (ISP), which administers the FEHB Program contracts, recently polled its nationwide health benefits plans regarding coverage for ABA. Each one indicated that it would consider ABA for the treatment of autism to be experimental or investigational. FEHB Program plans provide coverage only for services considered medically necessary and not experimental or investigational.

To validate the opinion of the FEHB Program health plans, ISP asked an expert independent medical consultant to conduct an analysis of ABA for the treatment of autism. ISP's consultant agreed that ABA would be considered investigational. The consultant indicated that ABA has not been proven in randomized experimental trials as beneficial, nor would it be considered medically necessary. According to this independent medical consultant, the American Academy of Pediatrics and the National Research Council also indicate that more replicative studies with improved methodology are needed before ABA can be recommended for all autistic children. Based on these findings, OPM cannot direct participating health plans to provide coverage for ABA. Should ABA undergo randomized trials, such that it is no longer considered investigational, we would still not mandate coverage as a matter of policy. At most, OPM would alert carriers to the fact that ABA was no longer investigational.

It is important to note that the FEHB Program provides the same health benefits for autism treatments as it does for other medical conditions. No FEHB Program plan may exclude services because they may be used to treat autism.

I appreciate the opportunity to respond to your interest in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Coles James".

Kay Coles James  
Director