

VIA EMAIL: www.regulations.gov

February 27, 2012

Secretary Leon E. Panetta
Department of Defense
c/o Federal Docket Management System Office
Room 3C843
1160 Defense Pentagon
Washington, DC 20301-1160

Dear Secretary Panetta,

RE: DOD-2011-HA-0076; RIN 0720-AB53, "TRICARE: Extended Care Health Option"

As an association representing behavioral healthcare provider organizations and professionals, the National Association of Psychiatric Health Systems (NAPHS) appreciates the opportunity to provide comments on the Department of Defense (DoD) proposed rule titled "TRICARE: Extended Care Health Option" (DOD-2011-HA-0076) as published in the December 29, 2011, *Federal Register*.

Founded in 1933, NAPHS advocates for behavioral health and represents provider systems that are committed to the delivery of responsive, accountable, and clinically effective prevention, treatment, and care for children, adolescents, adults, and older adults with mental and substance use disorders. Our members are behavioral healthcare provider organizations, including more than 700 psychiatric hospitals, addiction treatment facilities, general hospital psychiatric and addiction treatment units, residential treatment centers, youth services organizations, outpatient networks, and other providers of care. Our members deliver all levels of care, including inpatient, residential, partial hospitalization, and outpatient services.

COMMENTS

We are writing to support the DoD's proposal to adopt a tiered Applied Behavior Analysis (ABA) service delivery and reimbursement methodology for children with autism spectrum disorder. We also support the proposed rule's provision that would establish that the Director of TRICARE Management Activity will determine the requirements for ABA-authorized providers and ABA tutors as well as the allowed amount of reimbursement for ABA services.

A DoD demonstration tested whether ABA services would have a positive impact on the lives of children with autism and their families. The subsequent evaluation of the demonstration showed that parents of dependent children with autism did indeed indicate that these services had a positive impact on their children.

According to Autism Speaks, the nation's largest autism science and advocacy organization, autism affects 1 in 10 children and costs the nation more than \$35 billion each year. It is the fastest growing serious developmental disability in the U.S. More children will be diagnosed with autism this year than with AIDS, diabetes, and cancer combined.

We applaud the Department of Defense for moving forward with these additional services under the TRICARE program so that military children and their families will have access to the best and most effective treatments available to treat this very disabling and devastating illness.

Sincerely,

/s/

Mark Covall
President/CEO