

March 18, 2025

The Honorable Susan Donovan, Chair, House Committee on Health and Human Services  
Via email to: [HouseHealthandHumanServices@rilegislature.gov](mailto:HouseHealthandHumanServices@rilegislature.gov)

**Re: House Bill 5253, relating to insurance (autism spectrum disorders)**

Dear Chairwoman Donovan and Members of the Committee:

On behalf of Blue Cross & Blue Shield of Rhode Island (Blue Cross), I am writing to share information and drafting concerns, while also expressing willingness to work with the sponsor and Committee to address providers' concerns.

Blue Cross is aligned with the intent of the proposal.

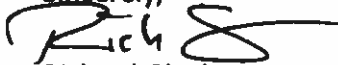
Section one of the bill eliminates the age limit for eligibility to receive services for the treatment of autism spectrum disorders. The Assembly adopted this language when enacting the law in 2011. **Blue Cross does not apply that age restriction.**

Section two of the bill sets a reimbursement rate, for certified applied behavior analysis (ABA) providers who are designated by the state, to be at least equal to the prevailing integrated state Medicaid rate. **Blue Cross reviews Medicaid rates at the time it sets the fee schedule and designs those payment levels to be at or above Medicaid's amounts.**

**Blue Cross urges the Committee to consider that if a fee schedule obligation were to be set in law, then more specific definitions and terms would aid in compliance.** Notably, Blue Cross uses common industry billing codes for ABA services, while Medicaid uses a mix of other codes.<sup>1</sup> Furthermore, timing and access to the information would need to be considered.

While the expense of these treatments can be significant, Blue Cross recognizes the concern of the sponsors and advocates. We appreciate your consideration.

Sincerely,



Richard Glucksman,  
Assistant General Counsel

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<sup>1</sup> [BCBSRI's payment policy for Autism Spectrum Disorders](#)