



Interim Joint Committee on Families and Children: Early Intervention, Autism, and ABA

Bart Baldwin, CEO & Founder, Baldwin Consulting

Shannon O'Connor, Executive Director, ABA Advocates

Olivia Hardy, BCBA/LBA, Behavior Services Director, Puzzle Pieces

June 17th, 2026

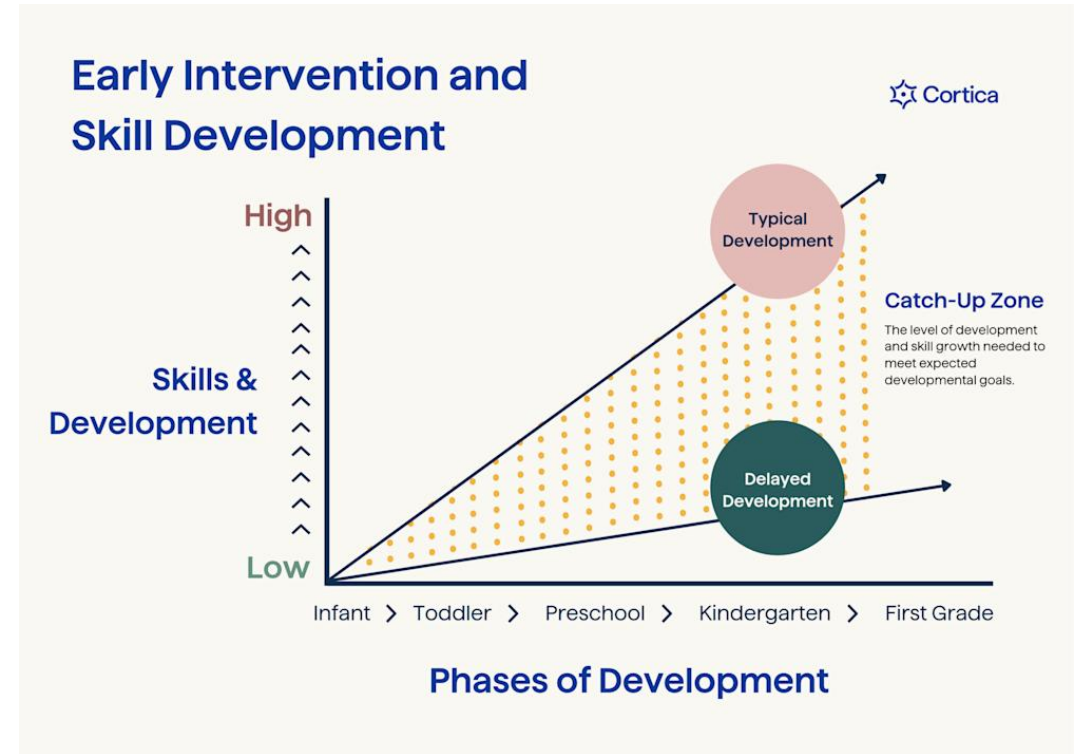
ABA Advocates

- ABA Advocates is a nonprofit association of Kentucky Applied Behavior Analysis (ABA) providers championing a Kentucky where children & families have access to high-quality, evidence-based ABA services. We unite providers, advance policy, and strengthen the field to ensure children can reach their fullest potential and families receive the support needed to thrive.
- ABA Advocates represents 19 ABA providers serving more than 2,000 Kentucky families in communities from Pikeville to Paducah.
- Our providers have a total of more than 1,500 families on their (often capped) waitlists.



Early Intervention and Autism

- Early intervention (EI) is defined as a critical period in development during which children receive the greatest benefit from therapy.
- The severity of a child's symptoms and behaviors dictates what EIs are most appropriate



Sources: [Autism Speaks](#), [CDC](#), [Cortica](#)

Types of Early Interventions for Autism

Speech Therapy

Learning to talk
and make
sounds
Feeding
Therapy



Occupational Therapy

Adaptive
Behavior Skills
Fine Motor Skills
Sensory
Processing



Physical Therapy

Gross Motor
Skills
Muscle
Strength
Coordination
Walking



Applied Behavior Analysis

Behavior Change
Safety
Emotion
Regulation
Effective
Communication



Applied Behavior Analysis

- ABA is widely acknowledged as the standard of care for treating autism and is, as such, recognized by the following national bodies:

American
Academy of
Pediatrics



NATIONAL
ACADEMIES

Sciences
Engineering
Medicine

AMERICAN ACADEMY OF
CHILD & ADOLESCENT
PSYCHIATRY



AMERICAN
PSYCHOLOGICAL
ASSOCIATION

NIMH

National Institute
of Mental Health



OFFICE OF THE UNITED STATES SURGEON GENERAL

— ∞ —
ABA Advocates

Applied Behavior Analysis

- ABA is the science of changing behavior in systematic and programmatic ways.
- ABA is a highly structured, evidence-based therapy designed to increase skills and decrease problem behaviors in individuals with autism and other developmental and intellectual disabilities.
- For children who are most severely impacted by autism, ABA is often a necessary precursor to be able to access other critical therapies (mentioned previously), and eventually to access the classroom

Sources: [Autism Speaks](#), [BACB](#), [The Cleveland Clinic](#), [NIH](#)

What does ABA look like in Kentucky's Communities?

- Children learn to express their wants, needs, feelings, and choices using spoken language, sign language, picture systems, communication devices, or other forms of communication
- Replace dangerous behaviors such as self-injury or aggression with safer ways to communicate, cope with frustration, and ask for help
- Teach skills such as using the bathroom independently, tolerating medical appointments, and participating safely in school and community activities

Impact on Families

*Bluegrass Alliance of Behavioral Health Family Survey (2025)



ABA Advocates

- A mother in Kenton County shared, “We’ve been waiting 4 months now for ABA services & therapies that my toddler desperately needs...it could be 4 more months- or longer to receive services. My child is missing critical developmental milestones and, as his parent, I feel like I’m failing him because Medicaid is failing him...I know early support can change lives, yet here we are. Stuck. Waiting.”
- A Warren County educator shared that they “have a 4-year-old student who is a giant safety hazard to herself. She has run away from her home three times and lives on a busy street. The police have been called because it’s such a dangerous situation. And yet she is on a waitlist for ABA therapy services. These children need help right now.”
- A parent in McCracken County shared...”My child was in ABA for three years and excelled. His ABA closed in Dec '23 and he hasn’t had ABA since. He’s been on waitlists. His behaviors have worsened.”

Impact on Families

*Bluegrass Alliance of Behavioral Health Family Survey (2025)



A Northern Kentucky ABA provider shared two examples:

- A foster family reached out to get services started...Due to the hoops the foster family has to jump through to get access to care for a child that is in their care short term, by the time we started making a plan the child was already placed into the custody of a new family. So for 2 years the child was referred to providers for care but had still not accessed any care because waitlists are so long and not every provider works with insurance.
- A guardian reached out to set up therapy for the child with a late diagnosis. Not many providers work with this age group or operate in-network with Medicaid. Now, the child's school is having difficulties with the behaviors and the guardian is required to pick them up multiple times a week. The family also really needs support in the home with the behaviors so everyone can remain safe.

Kentucky's Network Adequacy Standard

– Waitlists

- 907 KAR 17:015 Managed Care Organization requirements and policies related to providers.
 - (7) Appointment Wait Times.
 - (a) ..an appointment wait time for a primary care provider, behavioral health provider, specialist, or dental, general vision, laboratory, or radiological service **shall not exceed thirty (30)** calendar days from the date of an enrollee's request for a routine or preventive service.

Waitlist Crisis

- **Most providers have a waitlist range of 6 months to 4 years**
 - The longest a child has sat on a provider's wait list is 6 years (2,190 days)
 - The shortest amount of time a child spends on a provider's waitlist is 3-5 months
- In Kentucky, many children sit on a diagnostic waiting list for months to years, then sit on a treatment waitlist for months to years.

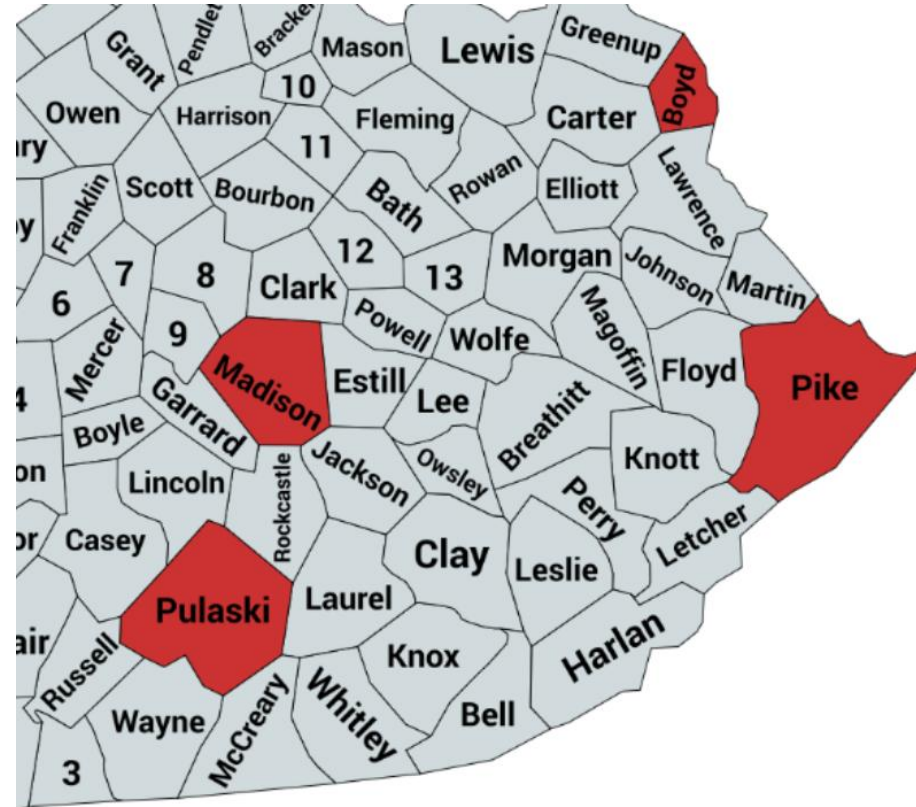
Source: ABA Advocates

Kentucky's Network Adequacy Standard – Time/Distance

KRS 304.17A-515 Requirements for managed care plan

- For urban areas, a provider network that is available to all persons enrolled in the plan within thirty (30) miles or thirty (30) minutes of each person's place of residence or work, to the extent that services are available; or
- For rural areas...all other providers shall be available to all persons enrolled in the plan within fifty (50) minutes or fifty (50) miles of each enrollee's place of residence or work, to the extent those services are available.

Reality for Families



■ Has an ABA Clinic
■ Has NO ABA Clinics

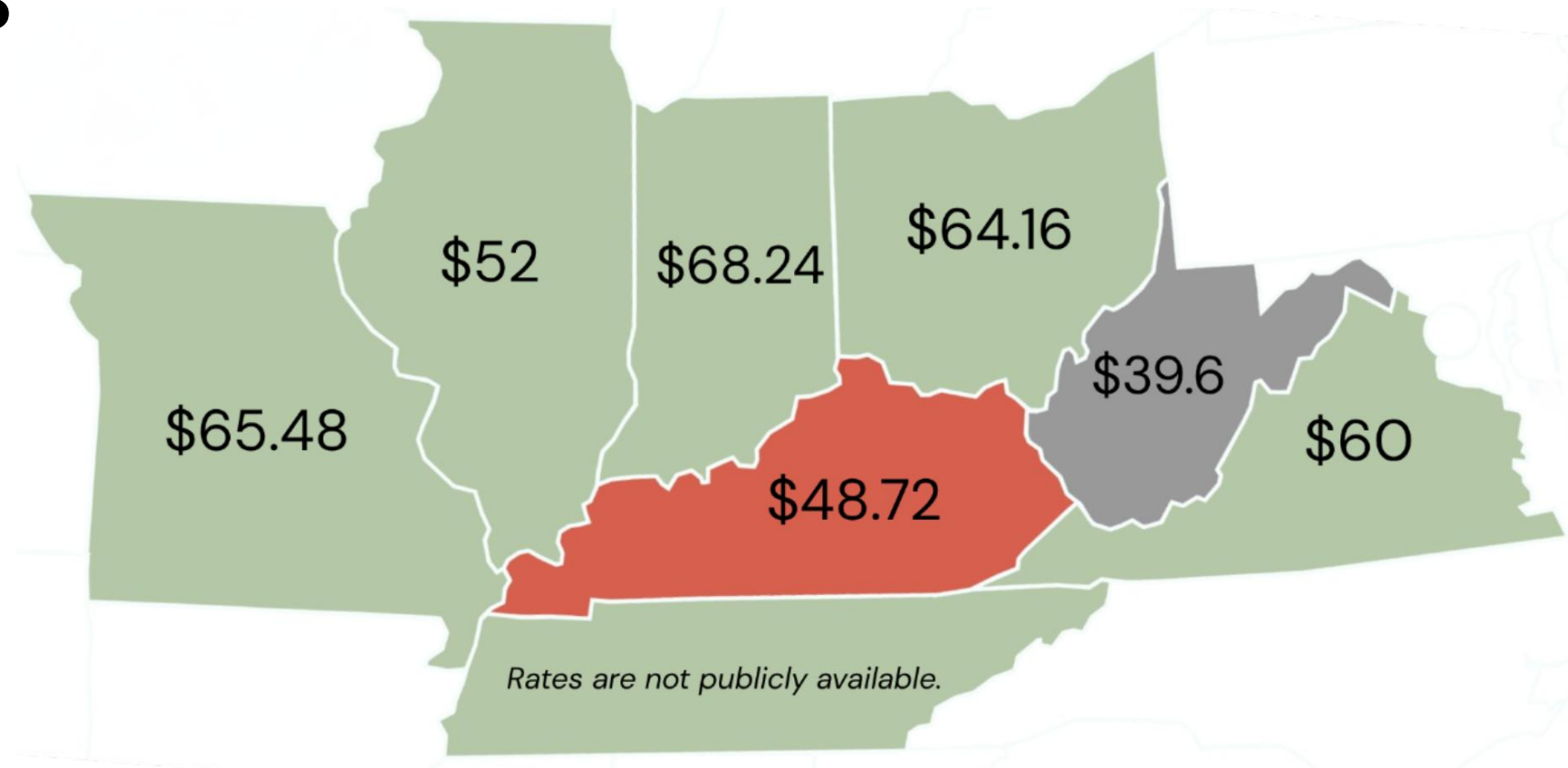
Network Adequacy Challenges – Service Rates

Kentucky has the 45th lowest rate in the nation.

- ABA Direct Service (97153 – per hour)
 - KY - \$48.72 (\$9.53 lower)
 - AVG border states - \$58.25
- ABA Supervision/Treatment Modification (97155 – per hour)
 - KY - \$87.96 (\$29.59 lower)
 - AVG border states - \$117.55

Source: [CASP Medicaid Benefit Comparison Data \(2025\)](#)

Network Adequacy Challenges – Service Rates



Source: [CASP Medicaid Benefit Comparison Data \(2025\)](#)

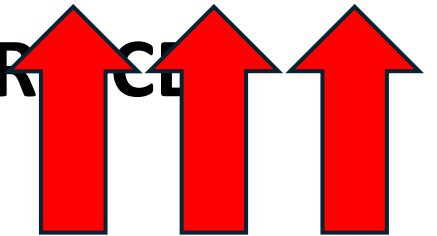
Kentucky Trains Professionals, Then Loses Them

- ABA programs at UofL, UK, NKU, EKU, Murray State, WKU (coming soon)
- Because neighboring states reimburse at higher rates, recruiting and retaining BCBAs and RBTs is increasingly difficult.
- ***Workforce shortages increase waitlists.***

**AVAILABLE
WORKFORCE**



NEED FOR SERVICE



Network Adequacy Challenges – MCOs Partnership and Compliance

- Network adequacy definitions
 - Should not account for providers with an active license who are not practicing
 - HB 479 will help collect accurate data
 - Should not assume 100% of an in-network provider's capacity is reserved for a single payer
- Rate negotiation
 - MCOs are required to negotiate rates with providers to meet regulatory Network Adequacy Standards.
 - However, providers most often experience MCOs referencing the woefully inadequate KY traditional Medicaid Fee Schedule rather than negotiating rates.
- Contract Compliance
 - Shifting regulatory and medical necessity interpretations & determinations
 - Timely notification of changes affecting the provision of services or the requirements for payment
 - Overly burdensome and inefficient prior authorization and audit processes

Recommendations to Expand Access to ABA Services

1. Ensure the Kentucky Department of Medicaid Services (DMS) holds MCOs accountable for compliance with federal regulations, state statutes/regulations, and state contract terms, and enforces fines and penalties for noncompliance as directed in HB 2.
2. Perform the required analysis to determine the reimbursement level needed to meet network adequacy standards set forth in state and federal law and to ensure parity with surrounding states. **Adjust reimbursement rates accordingly.**