



Public Statement from the Autism Treatment Association of Minnesota on DHS Pre-Payment Review and Payment Suspension

The [Autism Treatment Association of Minnesota \(ATAM\)](#) issues this statement in response to the Minnesota Department of Human Services' (DHS) implementation of pre-payment review for services delivered under the Early Intensive Developmental and Behavioral Intervention (EIDBI) benefit.

ATAM represents 23 autism treatment organizations serving more than 2,500 children with autism across Minnesota. Our members provide medically necessary autism therapy that depends on regular, predictable Medicaid reimbursement to remain operational. Any unnecessary delays or interruption of lawful Medicaid reimbursement payments by the State of Minnesota could result in irrevocable harm to numerous children with autism.

ATAM supports strong and effective efforts to prevent fraud, waste, and abuse in public programs. However, the current implementation of pre-payment review, including the suspension of payments for up to 90 days, has placed Minnesota's autism services system in immediate jeopardy and poses serious, potentially permanent health impacts for thousands of children with autism.

A 90-Day Payment Suspension Is Not Survivable for Many Autism Providers

While providers were aware that DHS intended to conduct pre-payment review, the scope and impact of the implementation is far more severe than anticipated.

For ATAM members, the impact was immediate and widespread. Every EIDBI claim submitted by all 23 ATAM member organizations in accordance with existing state and federal requirements and longstanding billing practices was suspended for review by a for-profit, third party organization with serious conflicts of interest. For many providers whose work is fully funded through EIDBI, this resulted in zero payment for the services already delivered.

DHS has publicly acknowledged that the suspension of all claims is a result of the directive to place all claims into pre-payment review rather than an identification that there is anything wrong with any of the claims individually. In other words, payments were not halted because of credible, evidence-based allegations of fraud or other deficiencies. Instead, DHS has arbitrarily decided to halt all payments to particular groups of service providers (and by extension the children who rely on those services for their care).

A suspension of payments at this scale and for an extended duration is not survivable for many autism providers, most of which are small businesses or non-profit organizations. They operate on narrow margins and rely on the State of Minnesota to meet legal Medicaid obligations.

Minnesota has long grappled with a shortage of autism service providers, with many families languishing on waitlists for months or years to begin services. The closure of even a small number of autism providers will be devastating to families and children across the state, eliminating options that do not exist elsewhere.

“The issue is not fraud prevention,” said Dr. Eric V. Larsson, PhD, Chair of ATAM. “The issue is that suspending EIDBI payments for up to 90 days puts longstanding, compliant providers in an impossible position. Many will be forced to close their doors long before that review window ends, not because of wrongdoing, but because they cannot survive without reimbursement for services already delivered. This would be an atrocious outcome for children with autism.”

The Consequences Are Immediate and Irreversible

When providers are forced to close or terminate services due to prolonged payment suspension:

- Children lose access to time-sensitive early intervention services with permanent health impacts that cannot be recovered later.
- Clinicians lose their jobs in an already strained workforce, further reducing statewide capacity.
- Families are forced to leave the workforce to care for children whose serious needs cannot be met in school or other settings.

A Minnesota parent receiving autism services from a trusted provider shared:

“These services are the difference between a happy, fulfilling life and constant stress, frustration, and confusion. School is not an option for my son. Without specialized autism services, we would be on our own, and we would be worse off for it. What these providers give families like mine is hope that our children have a real future.”

Oversight Must Not Come at the Expense of Care

EIDBI already includes extensive fraud prevention safeguards, including provider enrollment requirements, background studies, service authorization, documentation standards, supervision requirements, and ongoing program integrity review including site visits. These controls were designed to ensure appropriate, medically necessary care while allowing services to continue uninterrupted for children and families.

If DHS proscribes universal payment suspensions of 90 days across an entire program without any evidence of wrongdoing, it will cause a de facto shutdown of EIDBI provider agencies, regardless of compliance or quality of care.

“We want to comply with every rule and regulation,” said Jay O'Neill, President and Owner of Behavioral Dimensions, an ATAM member organization. “But a 90-day suspension of EIDBI payments creates an untenable situation. You cannot maintain staff, serve families, or keep doors open under those conditions.”

A Call for Immediate Course Correction

ATAM urges DHS and state leadership to take immediate action to prevent irreversible harm by:

- Restoring regular payments for EIDBI services while individualized provider claims reviews are conducted so that any wrongdoing is punished individually, not collectively.
- Reviewing a batch of claims instead of all claims unless credible evidence of fraud.
- Reducing the review window to a timeframe that does not force provider closures.
- Implementing a targeted, risk-based approach that allows compliant providers to continue operating.
- Engaging providers as partners in designing fraud prevention strategies that protect both taxpayer dollars and children's timely access to care.

“Minnesota can address fraud without dismantling essential autism services,” Dr. Larsson said. “But allowing payment suspensions of this magnitude will result in provider closures, longer waitlists, and children losing services through no fault of their own.”

Endorsed by the CEOs of ATAM Member Organizations

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