



Subject: Oppose AB 2233 — Program Integrity Risks

Dear Assembly Member Ta,

I respectfully urge you to withdraw AB 2233. While well-intended, the bill risks perpetuating known fraud vulnerabilities in California’s behavioral health treatment system by removing practical utilization constraints without sufficient safeguards.

Recent and concurrent developments underscore this risk:

- The Doogri Institute CMS federal audit request (March 9, 2026) identifies concerning billing and utilization patterns in Medi-Cal ABA services and calls for CMS and HHS-OIG scrutiny:
<https://doogri.org/2026/03/09/cms-audit-request-san-diego-pilot-march-6-2026/>
- SB 874 (Medi-Cal Behavioral Health Treatment Workgroup) reflects active legislative concern regarding utilization oversight and system integrity:
<https://legiscan.com/CA/text/SB874/id/3397604>
- Executive Order 14395 (“Establishing the Task Force to Eliminate Fraud,” March 16, 2026) directs strengthened federal enforcement across Medicaid programs:
<https://www.federalregister.gov/documents/2026/03/19/2026-05497/establishing-the-task-force-to-eliminate-fraud>

Advancing AB 2233 in this context would expand flexibility in a system already under investigation, without clearly reinforcing audit, documentation, and medical necessity controls.

For these reasons, I urge you to hold or withdraw the bill until program integrity risks are fully addressed.

Respectfully,

Dr. Henny Kupferstein
Policy Analyst, Doogri Institute
Autistic-Led Activism organization