

The Division of Health Care Financing and Policy

Applied Behavior Analysis Presentation

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September 30, 2015

Guidance for Children with Autism Spectrum Disorder (ASD)

- July 7, 2014 – CMS released guidance on ASD

<http://www.medicaid.gov/Federal-Policy-Guidance/Downloads/CIB-07-07-14.pdf>

- Coverage of comprehensive services for children with ASD under Medicaid State Plan authority.
- Coverage must include an evidence based behavioral intervention benefit.
- No time frame, expectation that States must move expeditiously.

Applied Behavior Analysis (ABA)

Applied Behavior Analysis

“Is the design, implementation and evaluation of environmental modifications using behavioral stimuli and consequences to produce meaningful changes in human behavior.”

Behavior Analyst Certification Board (2014). *Practice Guidelines for Healthcare Funders and Managers*.

http://www.bacb.com/Downloadfiles/ABA_Guidelines_for_ASD.pdf

Commonly Used Acronyms

Applied Behavior Analysis	ABA
Autism Spectrum Disorder	ASD
Behavior Analyst Certification Board	BACB
Board Certified Behavior Analyst	BCBA
Board Certified Assistant Behavior Analyst	BCaBA
Certified Autism Behavior Interventionist	CABI
Centers for Medicare & Medicaid Services	CMS
Early Periodic Screening, Diagnosis and Treatment	EPSDT
Registered Behavior Technician	RBT
State Plan Amendment	SPA

Medical Coverage Policy Development

DHCFP has taken the following steps:

- Held workshops to gain stakeholder input on medical coverage policy, provider qualifications, and billing codes;
 - September 15, 2014
 - November 13th, 2014 (South), November 18, 2014 (North)
 - December 10th, 2014
 - March 16th, 2015 Rates
 - April 28th, 2015 Rates
 - July 1, 2015 Rates

- Worked with sister agency to gain ATAP criteria; and

- Obtained copyright permission from the Behavior Analyst Certification Board to use the BACB guidelines.

Medical Coverage Criteria Highlights

- Recipients must be under 21 years of age;
- Have an established supporting diagnosis of ASD, and medical necessity;
- Exhibits excesses and/or deficits in behavior that impedes access to age appropriate home or community activities;
- Services are rendered in accordance with an individual's treatment plan with realistic and obtainable goals;
- Reasonable expectation individual will improve, or maintain to the maximum extent practical functional gains;
- Evidence based assessment criteria and individual test results; and
- Must be prior authorized.

Non Covered Services Highlights

- Services which do not meet medical necessity criteria;
- Services used to reimburse parent/guardian for participation in the treatment plan;
- Services rendered by the parent/guardian;
- Services that are duplicative under an Individual Family Service Plan (IFSP) or an Individual Education Plan (IEP);
- Vocational, recreational, respite, child care, education, equine therapy;
- Care coordination billed independently of direct services; and
- ABA cannot be reimbursed on the same day as other rehabilitative mental health services.

Billing Codes

CPT Category III Codes

- Assessments
- Adaptive Behavior Treatment (Individual)
- Adaptive Behavior Treatment (Group)
- Adaptive Behavior Treatment (Family) without child present
- Adaptive Behavior Treatment (Family) with child present

ABA Rates

Research

- National review of CPT Category III Code rates.
- States Medicaid policy coverage and rates.
- National review of RBT salaries.
- Staff development and credentialing costs for RBTs.

Calculation

Rates were determined using average wage information and allowing for normal business costs such as:

- FICA;
- Health Care Cost;
- Sick Leave Costs;
- Vacation Allowances;
- FUTA;
- Medicare;
- Workers Compensation;
- State Unemployment;
- Business Taxes;
- Indirect costs and some non-billable time*;
- Supervision;
- Staff Training and development, including Certification;
- Productivity Adjustments;
- Documentation; and
- Travel.

*Nevada Medicaid is governed by CMS and is required to follow OMB guidelines with regard to acceptable indirect costs and non-billable services.

Physician & Psychologist Services Currently Covered Under EPSDT

Covered Services

- Screening
- Diagnostic
- Evaluation
- Neurological Testing

Examples

- Ages and Stages Questionnaires (ASQ)
- Modified Checklist for Autism in Toddlers (MCHAT)
- Autism Diagnostic Observation Schedule (ADOS)

A recommended list of screens may be found at

<http://www.medicalhomeinfo.org/downloads/pdfs/DPIPscreeningtoolgrid.pdf>

Therapy Services Currently Covered Under Medicaid & NV Check Up (MSM 1700)

Covered Services

- Physical Therapy
- Occupational Therapy
- Speech Therapy

Coverage Criteria

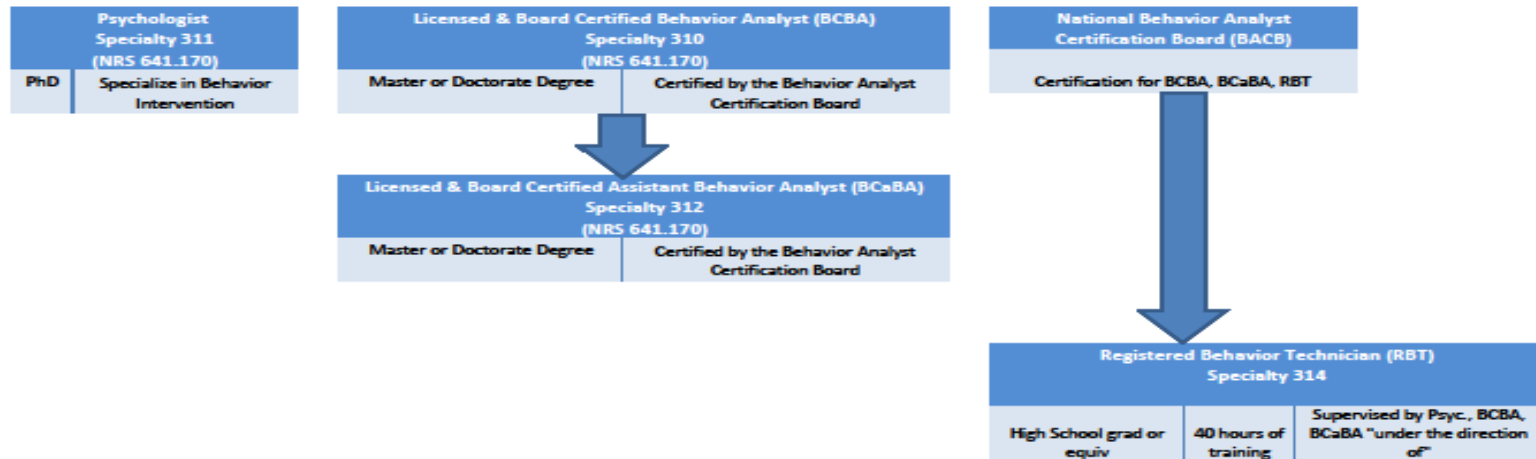
- Medically Necessary
- All therapy services must be prior authorized, with the exception of initial evaluations and re-evaluations

ABA Provider Qualifications

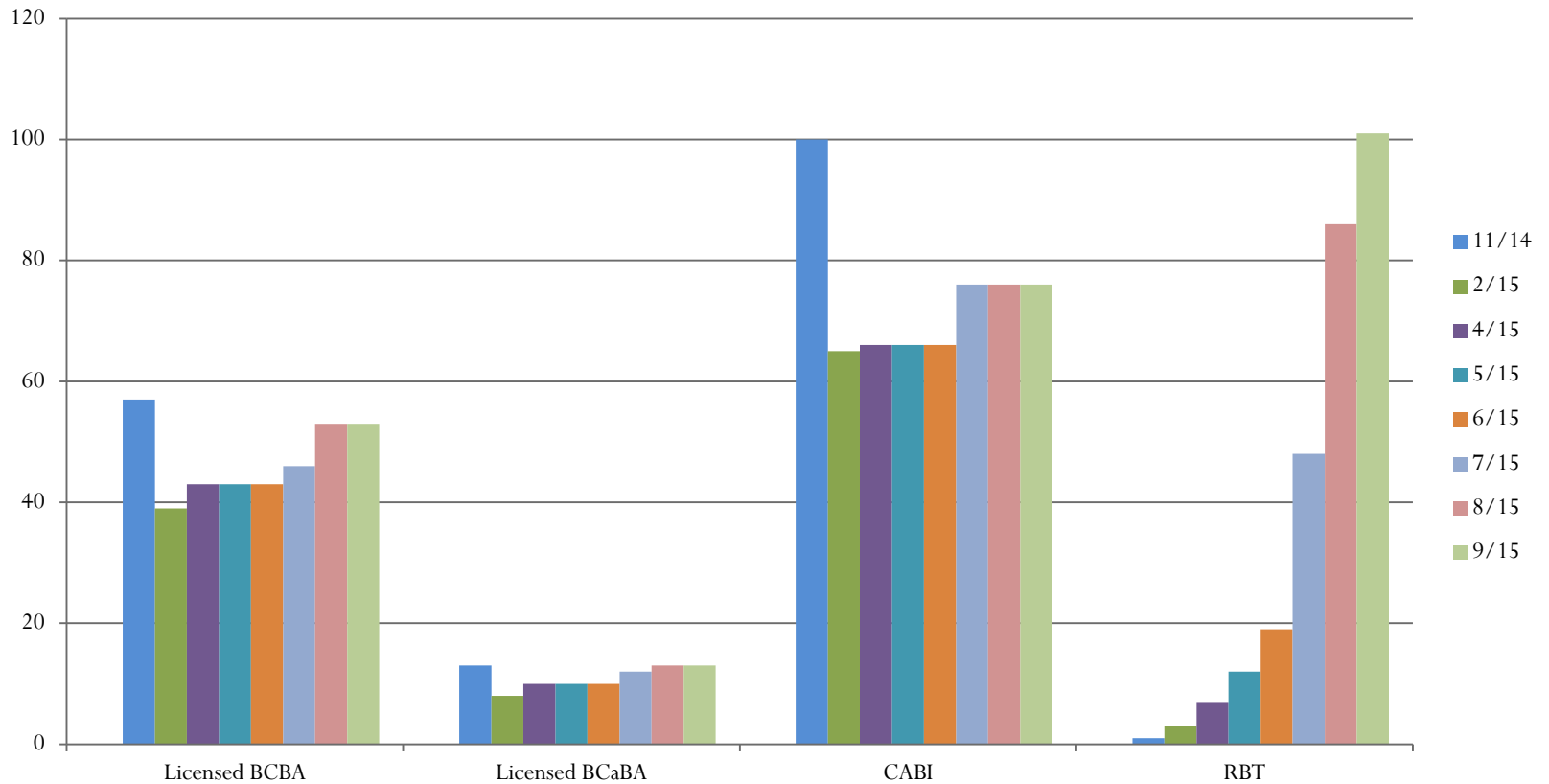
Division of Health Care Financing and Policy

Provider Type 85

Applied Behavior Analysis Provider Qualifications



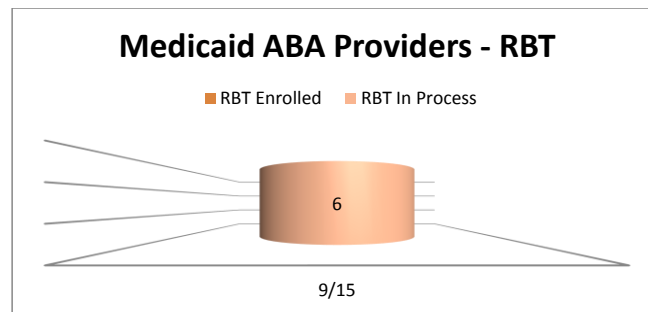
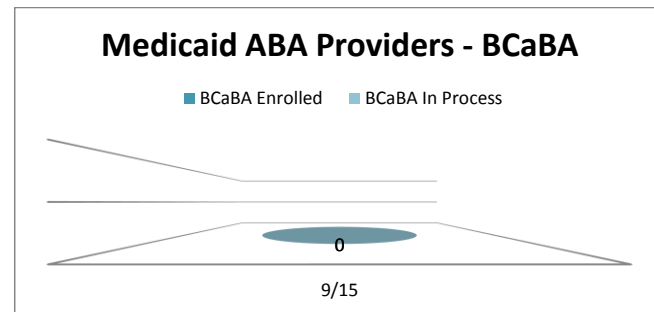
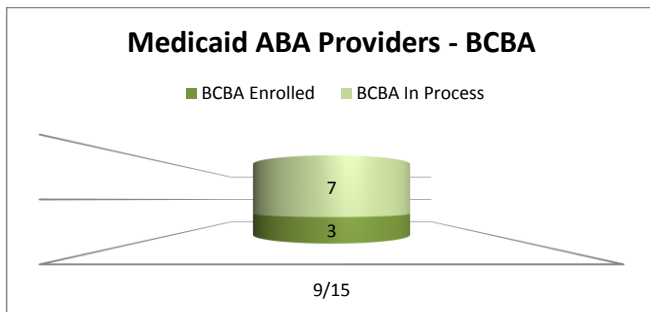
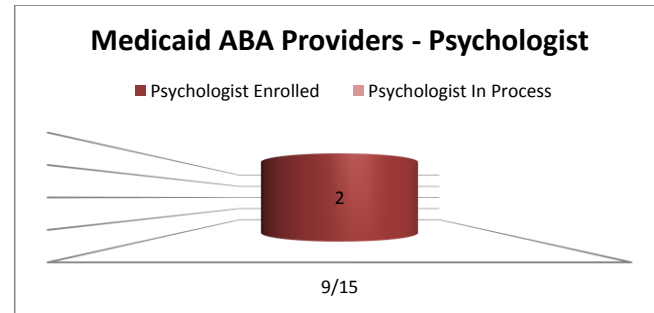
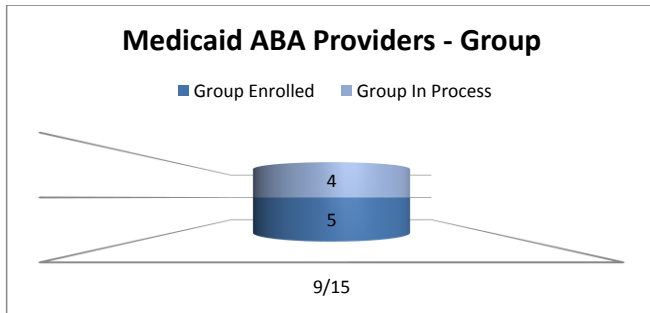
Provider Access



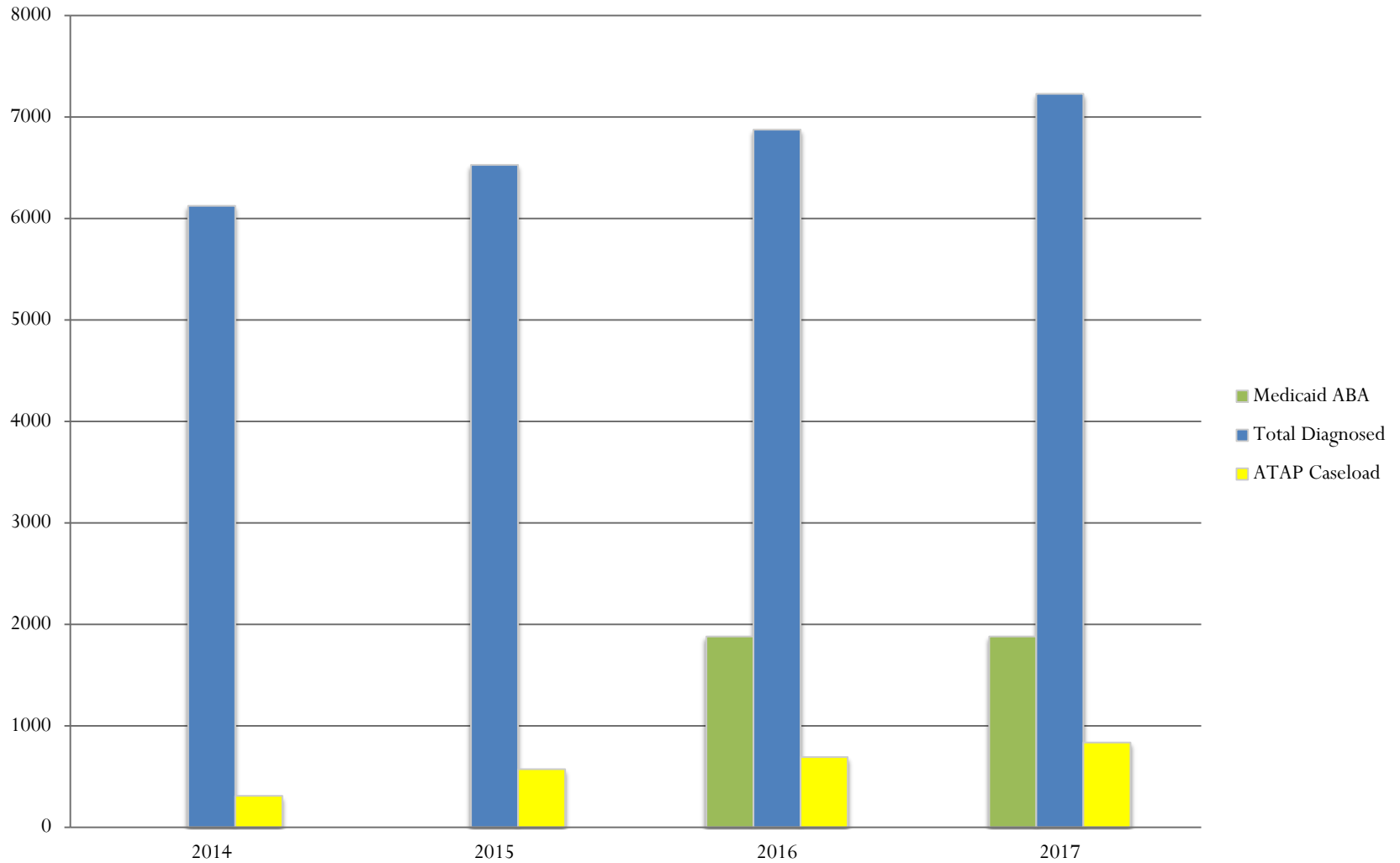
As of July 2015 the Board of Psychological Examiners reports with the passing of AB6 CABI's the Board is no longer certifying CABI's the numbers will drop as certifications expire. As of September 30th 2015 the BACB Registry reports 101 credentialed RBT's.

The data for current provider access is reported from the Nevada State Board of Psychological Examiners for Licensed BCBA's, Licensed BCaBA's and CABI's. Licensing/Certification occurs three times per year. Due to the fact there is no specialty category to identify Licensed Psychologists providing ABA services, Psychologists are not represented on the chart. RBT Data is reported from the Behavior Analyst Certification Board Registry; <http://www.bacb.com/index.php>. The Provider to Recipient ratio ranges from 16:1 to 24:1 depending on the treatment complexity "Applied Behavior Analysis Treatment of Autism Spectrum Disorder: Practice Guidelines for Healthcare Funders and Managers (2nd ed.)"

Medicaid ABA Provider Enrollment



Caseload Projections



Approximately 6,000 Nevada children have been diagnosed with Autism. ATAP reports approximately 30% are eligible for Medicaid.

Aging and Disability Services Division (ADSD) Initiatives and Workforce Development for ABA

- ADSD has partnered with University of Nevada, Reno to develop an Autism Learning Center that will be able to offer trainings and resources to families prior to beginning intensive intervention treatment. The goal of the learning center will be to prepare families for the intensity of treatment and to help families understand autism, behavioral therapy, and their role in their child's services.
- ADSD has partnered with University of Nevada, Las Vegas to purchase licenses for the online RBT training modules. This is the first step needed for people to begin the process in becoming an RBT.

DHCFP Completed Activities

July 2015

- Rates Workshop #3
 - As a result of the workshop DHCFP made revisions and the final rates draft has been completed
- Virtual Provider Enrollment Training was held on July 29th
- System implemented
- Provider enrollment/credentialing is in process

August 2015

- Review Manager
- Chapter, Policy SPA, and Rates SPA cleared RM and was prepared for posting
- Provider Outreach
 - HP made contact with 92 providers for enrollment outreach efforts
 - DHCFP followed up with 8 providers who indicated rates would prohibit from enrollment. Reducing that to 5 after outreach, which are assessing the feasibility and are considering
 - 33 providers are in the process of gathering necessary documentation to enroll
 - 14 are building the structure with recruiting professionals that meet provider qualifications then will enroll
 - 4 groups and 3 individuals have successfully enrolled (5 did not attend original events)
 - 3 groups and 2 individuals are pending enrollment

September 2015

- Chapter, Policy SPA, and Rates SPA have been posted to the DHCFP website for the October 19th Public Hearing
- Provider Outreach continues
 - ABA and Rehabilitative Mental Health coordination of care workshop was held on September 28th, 2015
 - Medicaid Newsletter article completed regarding status of ABA

DHCFP Upcoming Activities

October 2015

- Billing guide to be finalized and approved.
- Public Hearing October 19th for Chapter, Policy SPA, and Rates SPA
- Submittal of Policy and Rates SPA to CMS
- Prior Authorization to be finalized by DHCFP
- Continued outreach efforts for provider enrollment
- PA and Billing Training

November 2015

- PA and Billing Training
- PA system implementation
- PA submittal begins
- Continued outreach efforts for provider enrollment

December 2015

- Continued outreach efforts for provider enrollment
- PA and Billing Training
- PA submittal ongoing

Division of Health Care Financing and Policy
Applied Behavior Analysis (ABA) Timeline Dashboard as of 09/30/2015

Task	Start	End	Actual End	% Complete	Project Status
Policy Development	07/01/14	01/01/16		80%	
Policy Workshop 1	09/15/14	09/15/14	09/15/14	100%	
Policy Workshop 2	11/13/14	11/13/14	11/13/14	100%	
Policy Workshop 3	12/10/14	12/10/14	12/10/14	100%	
Policy Draft	08/01/14	12/24/14	12/24/14	100%	
Policy Review Manager Clearance	01/12/15	08/21/15	06/29/15	100%	
Policy Posting	08/21/15	09/18/15	09/18/15	100%	
Policy to Public Hearing	10/08/15	10/08/15	10/19/15	0%	
Policy Effective	01/01/16	01/01/16		0%	
Policy State Plan Amendment (SPA) Development	07/01/14	01/01/16		67%	
Policy Workshop 3*	12/10/14	12/10/14	12/10/14	100%	
Policy SPA Draft	09/15/14	12/24/14	12/24/14	100%	
Policy SPA Draft review w/CMS	12/24/14	02/27/15	05/07/15	100%	
Policy SPA Review Manager Clearance	03/01/15	08/21/15	08/15/15	100%	
Policy SPA Posting	08/21/15	09/18/15	09/18/15	100%	
SPA to Public Hearing	10/08/15	10/08/15	10/19/15	0%	
Estimated CMS Approval	01/01/16	01/01/16		0%	
Rate State Plan Amendment (SPA) Development	11/07/14	01/01/16		78%	
Research	11/07/14	03/01/15	02/20/15	100%	
Rates Public Workshop	03/01/15	03/31/15	03/16/15	100%	
Rates Public Workshop 2	04/01/15	04/28/15	04/28/15	100%	
Rates Public Workshop 3	05/15/15	08/15/15	07/01/15	100%	
Rates SPA Draft	04/01/15	05/30/15	08/21/15	100%	
Rates SPA Draft review w/CMS	05/01/15	05/30/15	08/21/15	100%	
Rates SPA RM Clearance	06/01/15	08/21/15	08/21/15	100%	
Rates SPA Public Notice Paper	08/21/15	09/18/15	09/18/15	100%	
Rates SPA Posting	08/21/15	09/18/15	09/18/15	100%	
Rates SPA Public Hearing	10/08/15	10/08/15	10/19/15	0%	
Estimated CMS Approval	01/01/16	01/01/16		0%	
Fee For Service (FFS) System Development	08/04/14	07/01/15		100%	
Statement of Work	01/22/15	02/15/15	02/17/15	100%	
Rates Mapped	01/22/15	03/31/15	07/24/15	100%	
System Design & Test	02/15/15	06/30/15	06/30/15	100%	
System Implementation	07/01/15	07/01/15	07/02/15	100%	
Hewlett Packard (HP) Enterprise Services	08/19/14	01/01/16		64%	
Enrollment Checklist	12/02/14	05/15/15	06/04/15	100%	
Billing Guide	12/02/14	09/15/15		90%	
Prior Authorization (PA) Form	12/02/14	05/15/15		95%	
Provider Training Enrollment Process	06/01/15	06/30/15	06/05, 06/26	100%	
Provider Enrollment Begins	07/01/15	01/01/16		66%	
PA and Billing Training	10/01/15	10/30/15		0%	
PA Submittal Begins	11/02/15	01/01/16		0%	
Managed Care Organizations (MCOs)	08/19/14	01/01/16		48%	
Provider Training Enrollment Process	06/01/15	06/30/15	06/05, 06/26	100%	
Provider Contract/Credential Enrollment Begins	07/01/15	01/01/16		66%	
Billing System Update	07/01/15	01/01/16		75%	
PA and Billing Training	10/01/15	10/30/15		0%	
PA Submittal Begins	11/02/15	01/01/16		0%	
Provider Outreach	07/01/14	12/30/16		77%	
ABA Updates Tribal Meetings	07/10/14	01/01/16		87%	
ABA Updates School District Collaboration Meetings	07/08/14	01/01/16		87%	
Quarterly Newsletter	10/10/14	01/01/16		84%	
Quarterly Web Announcements	11/21/14	01/01/16		78%	
Act Early Summit	02/02/15	03/13/15		100%	
Web Announcement EPSDT Screens	02/02/15	03/13/15		100%	
Monthly ABA Provider Calls	01/01/16	12/30/16		0%	

Indicates activity is on schedule, no risk factor ■
 Indicates activity is complete, no risk factor ■
 Indicates activity is at risk ■
 Indicates activity is behind schedule and critical ■



Overall Risk/Issue Status **Yellow**

GENERAL RISKS

ID	RIG	Title	Action Plan	Risk Owner	Risk Response	Risk Type	Status	Due Date	Comments / Updates
1	G	CMS review and feedback of Policy SPA is complete.	DHCFP to enter Policy SPA into Review Manager for internal review.	DHCFP	Accept	Schedule	Complete	02/27/2015	Completed -DHCFP received final feedback from CMS and entered Policy SPA into RM on 05/15/2015.
2	G	Policy SPA enter into internal clearance.	DHCFP entered Policy SPA into RM for internal review.	DHCFP	Accept	Schedule	Complete	03/01/2015	Internal review complete, SPA with Doc Control for posting. Public hearing is scheduled for 10/19
3	G	Policy SPA Posting	DHCFP ready for posting	DHCFP	Accept	Schedule	Active	09/18/2015	Internal review complete, SPA with Doc Control for posting. Public hearing is scheduled for 10/19
4	G	Policy SPA to Public Hearing	DHCFP ready for posting	DHCFP	Active	Schedule	Active	09/18/2015	Public hearing scheduled for 10/19
5	Y	Estimated CMS Approval	Dependent upon ID 4	DHCFP	Mitigate	Schedule	Active		ID 5 is dependent upon ID 1-4. CMS is an external source and timeframes will remain a risk factor. DHCFP plan remains to continue to monitor and communicate DHCFP staff and CMS.
6	G	Rates Workshop	Rates workshop is scheduled for March 16 th to gain stakeholder input	DHCFP	Accept	Schedule	Complete	03/16/2015	Completed – Stakeholders are submitting feedback to DHCFP for review. Potential request for second workshop depending on outcomes of feedback.
7	G	EPSDT Web Announcement	Release Web Announcement indicating screening for ASD	HP	Accept	Schedule	Complete	03/13/2015	Completed. Web Announcement 892 has been posted. https://www.medicaid.nv.gov/Downloads/provider/web_announcement_892_20150313.pdf
8	G	Rates Workshop 2	Rates revised on feedback from workshop 1. Workshop 2 is scheduled and posted to gain stakeholder input.	DHCFP	Accept	Schedule	Complete	04/28/2015	Completed - Rates have been revised based on feedback from Workshop 1. Revisions addressed on 04/28/2015.
9	G	Rates Workshop 3	Rates are being revised on feedback from feedback on workshop 2. Workshop 3 is to be scheduled and posted to gain stakeholder input	DHCFP	Accept	Schedule	Complete	07/01/2015	DHCFP Rates workshop completed 07/01/2015. Final rates established based on additional feedback from stakeholders.
10	G	Rates Mapping	Dependent upon ID 9	DHCFP	Mitigate	Schedule	Complete	07/24/2015	Rates finalized and to IS Unit for mapping.
11	G	Provider Enrollment Training	Provider enrollment training to be held in the North and South as an introduction to NV Medicaid and how to enroll with HPES and MCO's	HP	Accept	Schedule	Complete	06/05/2015 06/26/2015	Trainings are scheduled, agenda is set, and Web Announcement 916 has been posted. DHCFP emailed a copy of WA to stakeholders to share with potential ABA providers. Training completed. Additional virtual trainings have also been scheduled.
12	R	Prior Authorization Form	Provider Authorization (PA) form development and implementation	HP	Accept	Schedule	Active	05/15/2015	HP has developed and stakeholders have provided feedback. HP is in the process of final review of feedback and editing with medical reviewers. DHCFP continues to monitor to ensure activity is completed in time for PA training.
13	G	Rates SPA Draft	DHCFP posting of SPA	DHCFP	Accept	Schedule	Complete	09/18/2015	Internal review complete, Rates SPA posted. Public hearing is scheduled for 10/19
14	G	Rates SPA Draft Review with CMS	CMS review and feedback	DHCFP	Accept	Schedule	Complete	05/30/2015	Internal Review complete, Rates SPA posted. Public hearing is scheduled for 10/19
15	G	Rates SPA entered into RM	DHCFP is ready for public posting	DHCFP	Accept	Schedule	Complete	08/21/2015	Internal Review complete, Rates SPA posted.. Public hearing is scheduled for 10/19

ABA Webpage

<http://dhcfp.nv.gov/Pgms/CPT/ABA/>

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Division of Health Care Financing and Policy

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APPLIED BEHAVIOR ANALYSIS

Welcome to the State of Nevada Division of Health Care Financing and Policy (DHCFP) Applied Behavior Analysis (ABA) webpage. On July 7th, 2014 the Centers for Medicare and Medicaid Services (CMS) released guidance on approaches available under the federal Medicaid program for providing medically necessary diagnostic and treatment services to children with Autism Spectrum Disorder (ASD). The DHCFP is proposing coverage for ABA services rendered to Medicaid eligible individuals under age 21, including children with ASD, based on individual determinations of medical necessity.

Definitions

Autism Spectrum Disorder (ASD) is a group of developmental disabilities that can cause significant social, communication and behavioral challenges. A diagnosis of ASD can include Autistic Disorder, Pervasive Developmental Disorder-Not Otherwise Specified (PDD-NOS), or Asperger's Disorder.

Applied Behavior Analysis (ABA) is the design, implementation, and evaluation of environmental alterations to produce socially significant improvement in human behavior, including the use of direct observation, measurement and functional analysis of the relations between environment and behavior.

RESOURCES

- DHCFP ABA Provider Enrollment
- Introduction to Becomin a Nevada Medicaid Provider for ABA 2015.0615
- HPN ABA Credentialing Presentation
- Americgroup ABA Credentialing Presentation

REPORTS

FORMS

Contact

ABAServices@dhcfp.nv.gov

Links

- CMS Information Bulletin July 7, 2014
- Centers for Disease Control and Prevention
- Autism Treatment Assistance Program (ATAP)
- Nevada Autism Coalition
- Nevada Act Early
- CDC Milestone Moments

Meetings & Workshops

- Upcoming Meetings & Workshops
- 2015 Workshops
- 2014 Workshops

Regulatory

[LINK TO MSM CHAPTERS](#)

Last Edited: 7/30/2015

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Questions?

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