

# The Division of Health Care Financing and Policy

## Applied Behavior Analysis Presentation

Shannon Sprout, SSPSIII  
Child and Adolescent Services Specialist  
Clinical Policy Unit, DHCFP  
775-684-3732  
[shannon.sprout@dhcfp.nv.gov](mailto:shannon.sprout@dhcfp.nv.gov)

# 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](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 three workshops to gain stakeholder input on medical coverage policy, provider qualifications, and billing codes;
  - September 15, 2014
  - November 13<sup>th</sup>, 2014 (South), November 18, 2014 (North)
  - December 10<sup>th</sup>, 2014
  - March 16<sup>th</sup>, 2015 workshop scheduled for 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



# Physician & Psychologist Services Currently Covered Under EPSDT

## Covered Services

- Screening
- Diagnostic
- Evaluation
- Neurological Testing

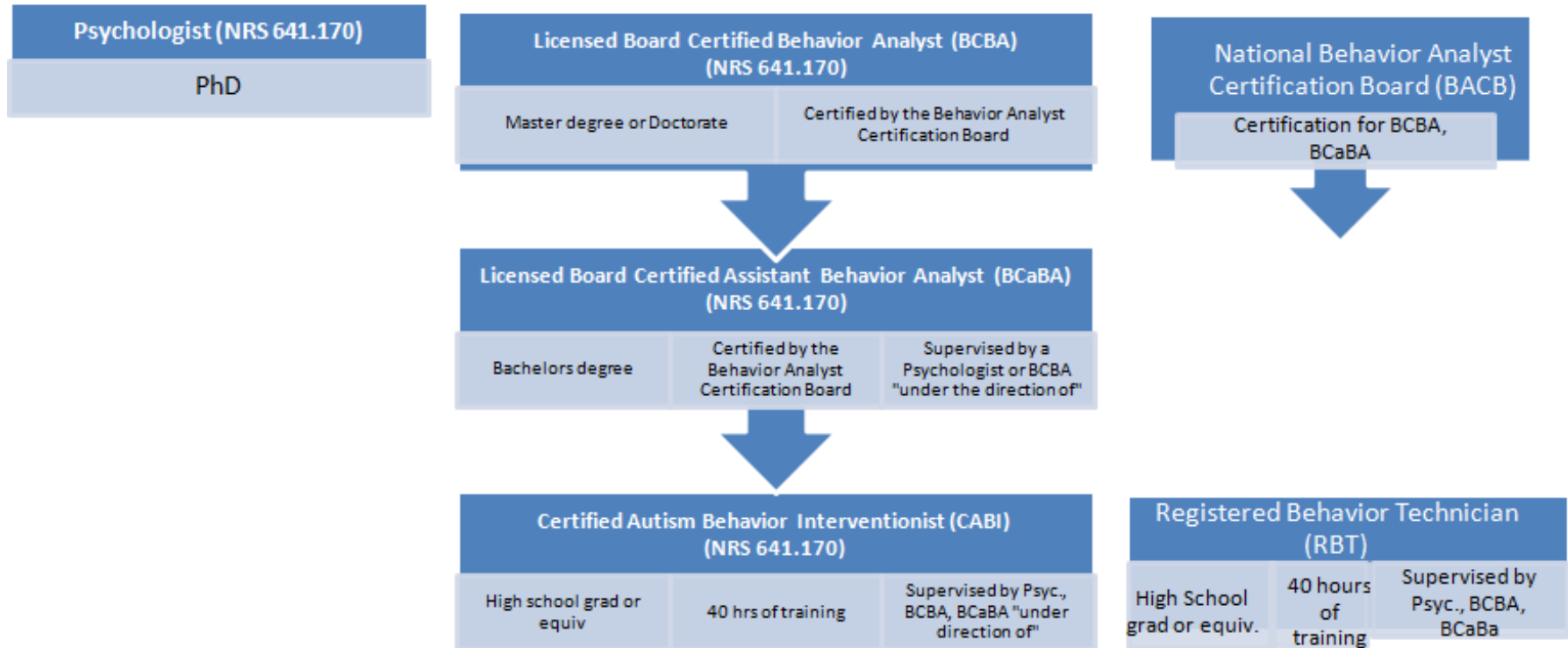
## Examples

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

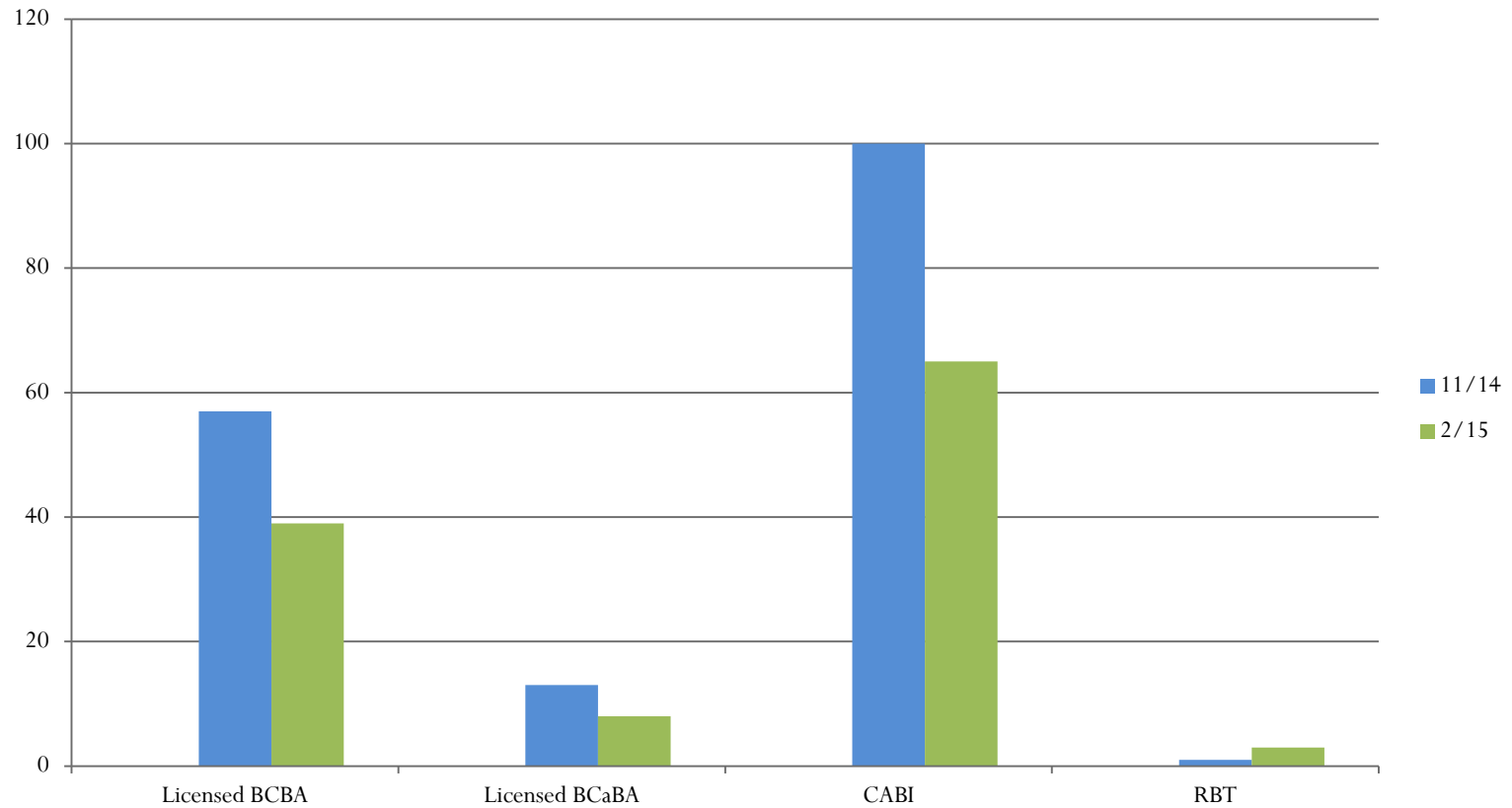
A recommended list of screens may be found at

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

# ABA Provider Qualifications

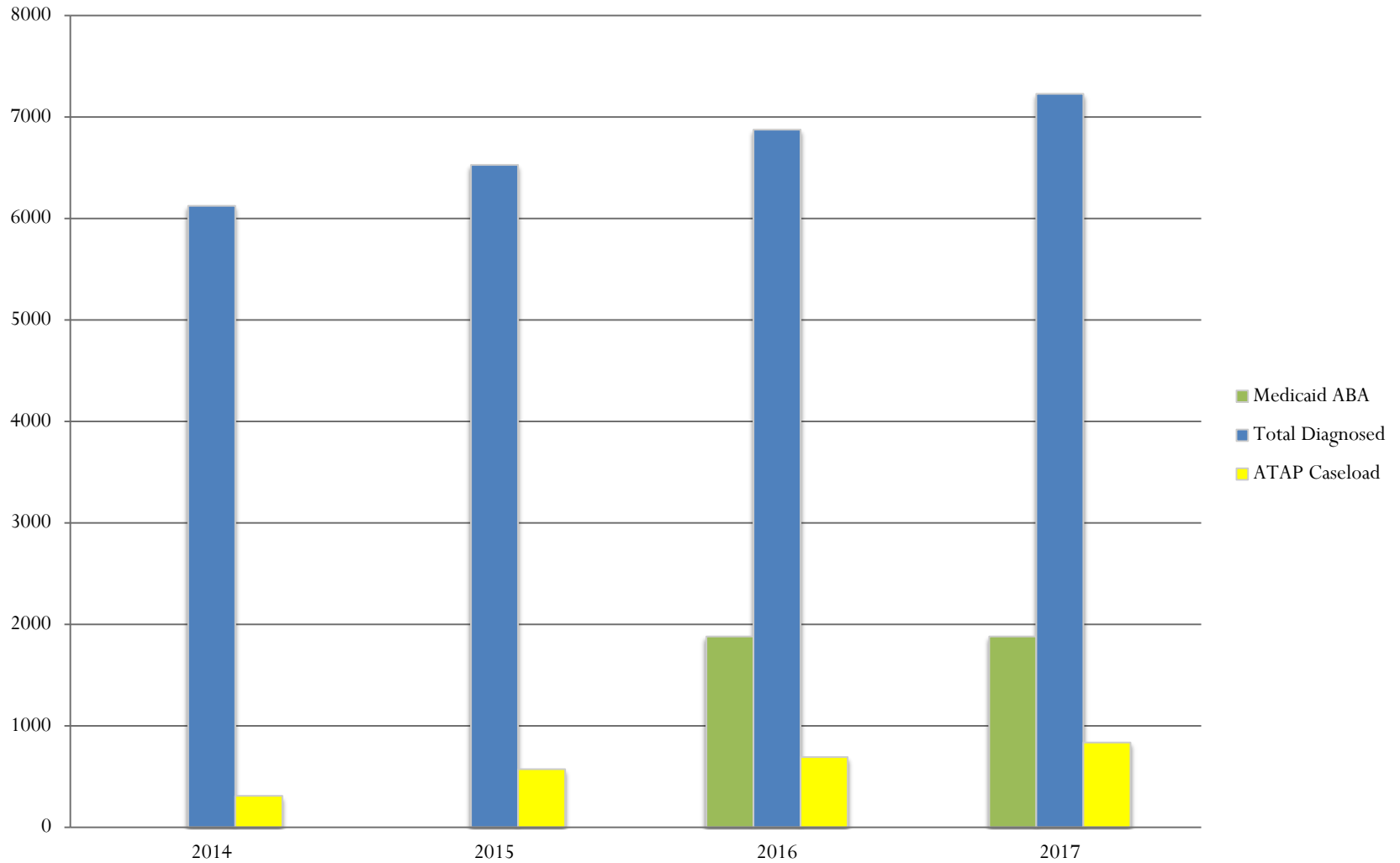


## Provider Access



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, as a result some of the decrease in providers is associated with renewals; an increase is anticipated with the State exam in March. 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 (2<sup>nd</sup> ed.)"

# Caseload Projections



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

# DHCFP Upcoming Activities

## March 2015

- Policy SPA Draft- Review with CMS
- Policy SPA Draft – Internal Clearance
- Rates - Workshop
- EPSDT Screening Web Announcement

## April 2015


- Outreach - Quarterly Newsletter
- Rates – Draft Rates SPA


## May 2015


- Rates SPA Draft – Send to CMS for Review
- Forms Development – Prior Authorization


**Division of Health Care Financing and Policy**  
**Applied Behavior Analysis (ABA) Timeline Dashboard as of 03/09/2015**

Task	Start	End	Actual End	% Complete	Project Status
<b>Policy Development</b>	07/01/14	01/01/16		38%	
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		80%	
Policy Posting	08/21/15	09/04/15		0%	
Policy to Public Hearing	10/08/15	10/08/15		0%	
Policy Effective	01/01/16	01/01/16		0%	
<b>Policy State Plan Amendment (SPA) Development</b>	07/01/14	01/01/16		32%	
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		90%	
Policy SPA Review Manager Clearance	03/01/15	08/21/15		0%	
Policy SPA Posting	08/21/15	09/04/15		0%	
SPA to Public Hearing	09/04/15	10/08/15		0%	
Estimated CMS Approval	01/01/16	01/01/16		0%	
<b>Rate State Plan Amendment (SPA) Development</b>	11/07/14	01/01/16		19%	
Research	11/07/14	03/01/15	02/20/15	100%	
Rates Public Workshop	03/01/15	03/31/15	03/16/15	75%	
Rates SPA Draft	04/01/15	04/30/15		0%	
Rates SPA Draft review w/CMS	05/01/15	05/30/15		0%	
Rates SPA RM Clearance	08/01/15	08/21/15		0%	
Rates SPA Public Notice Paper	08/21/15	09/04/15		0%	
Rates SPA Posting	08/21/15	09/04/15		0%	
Rates SPA Public Hearing	10/08/15	10/08/15		0%	
Estimated CMS Approval	01/01/16	01/01/16		0%	
<b>Fee For Service (FFS) System Development</b>	08/04/14	07/01/15		46%	
Statement of Work	01/22/15	02/15/15	02/17/15	100%	
Rates Mapped	01/22/15	03/31/15		75%	
System Design & Test	02/15/15	08/30/15		10%	
System Implementation	07/01/15	07/01/15		0%	
<b>Hewlett Packard (HP) Enterprise Services</b>	08/19/14	01/01/16		6%	
Enrollment Checklist	12/02/14	09/15/15		10%	
Billing Guide	12/02/14	09/15/15		10%	
Prior Authorization (PA) Form	12/02/14	05/15/15		25%	
Provider Training Enrollment Process	08/01/15	06/30/15		0%	
Provider Enrollment Begins	07/01/15	01/01/16		0%	
PA and Billing Training	10/01/15	10/30/15		0%	
PA Submittal Begins	11/02/15	01/01/16		0%	
<b>Managed Care Organizations (MCOs)</b>	08/19/14	01/01/16		0%	
Provider Training Enrollment Process	08/01/15	08/30/15		0%	
Provider Contract/Credential Enrollment Begins	07/01/15	01/01/16		0%	
Billing System Update	07/01/15	01/01/16		0%	
PA and Billing Training	10/01/15	10/30/15		0%	
PA Submittal Begins	11/02/15	01/01/16		0%	
<b>Provider Outreach</b>	07/01/14	12/30/16		44%	
ABA Updates Tribal Meetings	07/10/14	01/01/16		52%	
ABA Updates School District Collaboration Meetings	07/08/14	01/01/16		52%	
Quarterly Newsletter	10/10/14	01/01/16		40%	
Quarterly Web Announcements	11/21/14	01/01/16		25%	
Act Early Summit	02/02/15	03/13/15		90%	
Web Announcement EPSDT Screens	02/02/15	03/13/15		50%	
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 

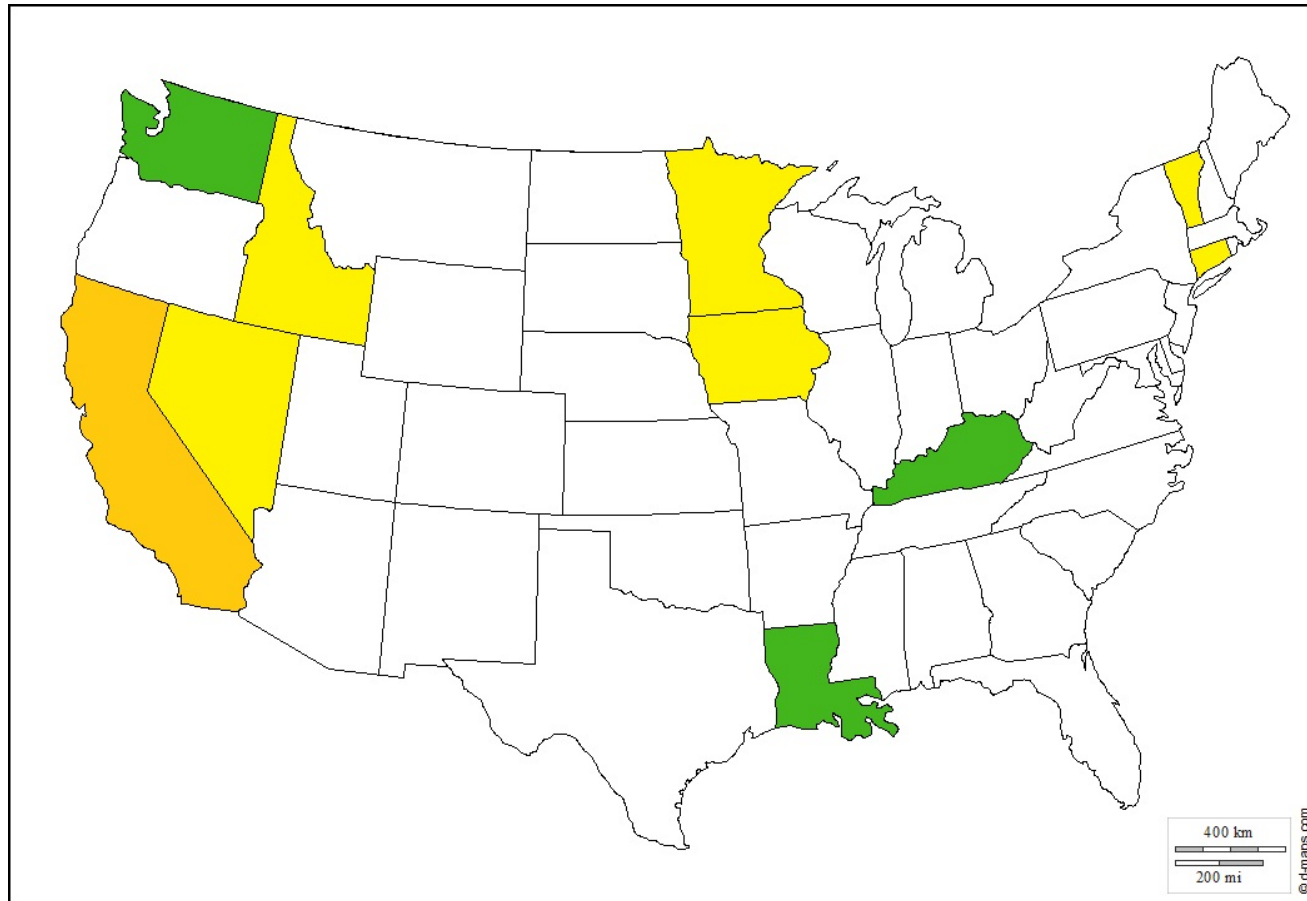
Risks

Overall Risk/Issue Status **Yellow**

**GENERAL RISKS**

ID	RYG	Title	Action Plan	Risk Owner	Risk Response	Risk Type	Status	Due Date	Comments / Updates
1	R	CMS review of Policy SPA – exceeded initial estimate fo timeframe	DHCFP is closely monitoring and communicating with CMS	DHCFP	Accept	Schedule	Active	02/27/2015	Communication with CMS requesting a response. CMS will review with the team and provide a status update by 03/06/2015.
2	Y	Policy SPA enter into internal clearance	Dependent upon ID 1.	DHCFP	Mitigate	Schedule	Active	03/01/2015	Lead time is sufficient on internal review if resolution with ID 1 is reached within the next 2 weeks. Plan remains to continue to monitor and communicate with CMS for final feedback.
3	Y	Policy SPA Posting	Dependent upon ID 2	DHCFP	Mitigate	Schedule	Active	08/21/2015	Lead time is sufficient on internal review. If resolution with ID 1 is reached within the next 2 weeks dependencies will be resolved. Plan remains to continue to monitor and communicate with CMS for final feedback on ID 1.
4	Y	Policy SPA to Public Hearing	Dependent upon ID 3	DHCFP	Mitigate	Schedule	Active	09/04/2015	Lead time is sufficient on internal review. If resolution with ID 1 is reached within the next 2 weeks dependencies will be resolved. Plan remains to continue to monitor and communicate with CMS for final feedback on ID 1.
5	Y	Estimated CMS Approval	Dependent upon ID 4	CMS	Accept	Schedule	Active		ID 4 is dependednt 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.
6	G	Rates Workshop	Rates workshop is scheduled for March 16 <sup>th</sup> to gain stakeholder input	DHCFP	Accept	Schedule	Active	03/16/2015	Rates workshop will provide draft rates for CPT Category III codes and allow for input from stakeholders
7	G	EPSDT Web Announcement	Release Web Announcement indicating screening for ASD	HP	Accept	Schedule	Active	03/13/2015	DHCFP submitted draft WA to HP. HP is in the process of internal approvals and then to submit to DHCFP for final approval.

# National Progress



Green indicates SPA “Approved”.

Orange indicates SPA “Pending Approval”.

Yellow indicates SPA development “In Process”.



# ABA Webpage

<https://dhcfp.nv.gov/ABA.htm>

**DHCFP INDEX**

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- Forms
- Grants
- Hearings
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- HPES
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- Medicaid Programs
- Medicaid State Plan
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- Providers
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- Subrogation
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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 7<sup>th</sup>, 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.

**WORKSHOPS**

- [Agendas](#)
- [Minutes](#)
- [Presentations](#)

**RESOURCES**

- [CMS Information Bulletin July 7, 2014](#)
- [Centers for Disease Control and Prevention](#)
- [Nevada Autism Coalition](#)
- [Autism Treatment Assistance Program \(ATAP\)](#)

**QUESTIONS**

Email [ABAServices@dhcfp.nv.gov](mailto:ABAServices@dhcfp.nv.gov) to ask questions about Applied Behavior Analysis services.

**WHAT'S NEW**

**IMPORTANT!**

- [Follow Up Communication](#)
- [Innovative Care Comments](#)
- [HCBS New Rule Information](#)
- [ICD-10](#)
- [Ordering, Prescribing or Referring Providers \(OPR\)](#)
- [Self-Attestation Form for Eligible Providers and Statement of Responsibility](#)
- [DHHS - Office of Health Information Technology \(HIT\)](#)
- [Nevada Compare Care - Transparency in Health Care](#)
- [Nevada Enterprise Medicaid Modernization \(NEMMo\)](#)

Friday February 20th 2015

100%

Carson City  
1100 East William Street  
Suite 101  
Carson City, NV 89701  
Main Number: (775) 684-2676

Las Vegas Medicaid District Office  
1210 S. Valley View  
Suite 104  
Las Vegas, NV 89102  
Main Number: (702) 659-4300

Elko  
1010 Ruby Vista Drive  
Suite 103  
Elko, NV 89801  
Main Number: (775) 753-1101

Reno  
560 Hammill Way  
Reno, NV 89511  
Main Number: (775) 687-1900

# Questions?

[ABAServices@dhcfp.nv.gov](mailto:ABAServices@dhcfp.nv.gov)

Shannon Sprout

DHCFP, Social Services Program Specialist III

[shannon.sprout@dhcfp.nv.gov](mailto:shannon.sprout@dhcfp.nv.gov)