# Medicaid and the Behavior Analyst

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#### **Presentation Outcomes**

#### Purpose:

This training is meant to inform about the Medicaid process and to educate BCBAs on how billable services and expectations fit into the scope of practice for a BCBA.

#### Objectives:

- Understand how certain typical activities with students would align to Medicaid billable services (and those that would not)
- Develop a working understanding of the Medicaid billing process
- Explain the purpose of the Random Moment Time Sample (RMTS) related to reimbursement

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#### Expansion of Medicaid services that apply to BCBAs

As of July 2022 Medicaid now allows school divisions to submit claims for **Adapted Behavior Treatment** services provided by a LBA or LABA

This presentation is intended to inform you of the expectations and how your current work aligns with the Medicaid process.



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- You are a licensed, qualified <u>health care</u> professional working in a school setting.
- Educational needs and health care needs can and do overlap!
- As a licensed provider, you have special skills and training to address underlying health and behavioral issues that are impacting a student's ability to succeed in the educational environment.

### Health Care Professionals working in Schools

"...the school setting offers a unique opportunity to enroll children in Medicaid and facilitate access to coverage as well as provide health services directly to ANY Medicaid enrolled children. Schools provide a venue to enhance early identification of health needs and connect students to a broad range of health care services, including behavioral health resources."

- Centers for Medicare and Medicaid Services, May 2023

https://www.medicaid.gov/resources-for-states/medicaid-state-technical-assistance/medicaid-and-school-based-services/index.html

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# School Services on the Continuum of Care

 School-based practitioners provide important health-related services on the continuum of care for the children you serve.



To help product post order

#### Continuum of Care

- School division direct services are an important healthcare component on the continuum of care in a school setting.
- Other healthcare providers, such as long-term care providers and hospital providers, are also on the continuum.
- All services on the continuum represent important  $\mbox{\bf health}$  care services.
- The direct services that school divisions provide are not "less than" other services and settings.
- orner services and settings. When students receive services both in-schooland out, the services that school divisions provide do not duplicate services in other settings, but rather compliment them.

  Schools provide important health care services, which when taken together with community-based services, can address the full scope of services that kids need on the complete continuum of care.

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#### Health Care Professionals working in Schools

- As a provider working under the scope of your license, you are a health care provider, providing services in an education setting.
- Anytime that you are wearing your discipline's "hat" remember that you are bringing your skills, training, experience and scope of license to the work that you are doing, including:  $\frac{1}{2} \int_{-\infty}^{\infty} \frac{1}{2} \left( \frac{1}{2} \int_{-\infty}^{\infty} \frac{1}{2} \int_{-\infty}^{\infty} \frac{1}{2} \left( \frac{1}{2} \int_{-\infty}^{\infty} \frac{1}{2} \int_{-\infty}$ 
  - O Direct services with student(s)
  - O Preparation/planning for services and paperwork/follow-up activities related to services (report writing, documentation, etc.)
  - Bringing your skills/training/license to contribute to a meeting, consultation, communication, coordination, training and other similar activities.
- When you are doing an activity that can be done by an unlicensed provider (lunch duty, bus duty, teaching, etc.), this is considered educational.
- It's important to keep your role as a health care professional in mind when responding to the RMTS. (More to come on RMTS later in this presentation.)



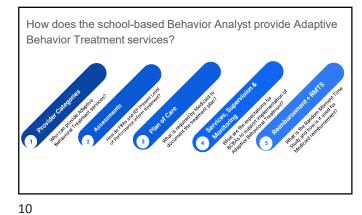
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#### General practice of a BCBA



Surveys and school division job descriptions have indicated that BCBAs are expected to complete the following tasks as part of their role:

- Develop and implement behavioral programs
- Conduct descriptive and systematic behavioral assessment
- Teach others to carry out ethical and effective behavior analytic interventions
- Develop student data collection tools
- Monitor classroom instructional procedures and Behavior Intervention Plans





Medicaid includes broad categories:

- Licensed provider
  - Referring provider
  - Non-referring provider
- Unlicensed provider





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Requirements for Registered Behavior Technician	
Must follow individual licensing related laws and regulations	
VA Licensure defaults back to certification board	
Includes requirements for supervision and frequency of	
supervisory visits  If individual licensing requirements do not specify frequency,	
the supervisor will complete supervisory visits at least every 90	
days BACB	
Constant of the Constant of th	
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Supervision Considerations	
Supervising RBT     Regulated by the BACB	
Follow guidelines and supervisory structure     Supervision of other unlicensed personnel (IA or para staff)	
<ul> <li>Professional judgement and justification</li> </ul>	
<ul> <li>Monitoring for fidelity</li> <li>Assessing training needs</li> </ul>	
o AT LEAST every 90 days	
L 14	
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Comittees and CDT Codes	
Services and CPT Codes	
CPT Codes - Current Procedural Terminology Code     Each service has a code	

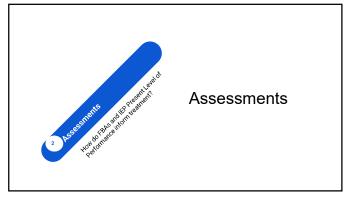
 $\circ \;\;$  Codes are used to categorize the services rendered

o Adaptive Behavior Supporting Assessment - 97152

o Required when submitting a claim

o Adaptive Behavior Assessment - 97151

Assessment CPT Codes





#### Conducting assessments aligns with the BACB Ethics Code:

2.13 Selecting, Designing, and Implementing Assessments

Before selecting or designing behavior-change interventions behavior analysts select and design assessments that are conceptually consistent with behavioral principles; that are based on scientific evidence; and that best meet the diverse needs, context, and resources of the client and stakeholders. They select, design, and implement assessments with a focus on maximizing benefits and minimizing risk of harm to the client and stakeholders. They summarize the procedures and results in writing.

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#### Functional Behavior Assessments (FBA) or Analyses (FA)

- Typically include the following components:
  - Description of the target behavior
  - Data collection tools
  - Data analysis
  - o Hypothesis of the function of the problem behavior
  - o Determination if a Behavior Intervention Plan is required
- School divisions vary in how they document FBA results
   Through IEP system options provided

  - Separate documents with same components
  - May be summarized within the Present Level of Performance of a child's IEP

CPT Code: Adaptive Behavior Assessment

#### Activities related to assessment by a BCBA

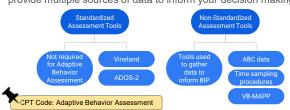
- File Review
- Indirect assessment
- Parent and teacher interviews
- Direct observation and data collection
- Criterion Referenced Assessments (VB-MAPP, FACTER, Vineland, ABLLS)
- Scoring Assessments
- Interpreting results / synthesizing information
- · Preparing observation and reports
- Meeting with parents and teachers to discuss findings and recommendations
- Developing the plan of care

CPT Code: Adaptive Behavior Assessment

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#### Assessment Tools & Procedures

Your standards of practice, professional training and experience guide you to select instruments, tools and procedures that will provide multiple sources of data to inform your decision making.



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#### Data collection is a team effort!

There are times when the data gathered for assessments is taken by classroom staff. Data collection can be completed by not-DMAS qualified provider that supports the assessment. It is only billable if performed by a RBT.

- Unlicensed individual under the direction of a physician or other qualified healthcare professional (LBA or LABA).
- BCBA may or may not be on site
- Interpretation of results must still be completed by the LBA/LABA



## Adaptive Behavioral Assessment - Documentation

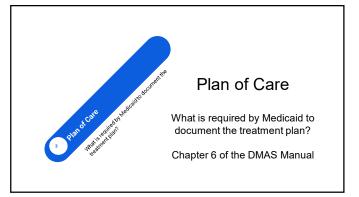
Component Required:	Required by Medicaid	Typically documented by BCBAs
Diagnostic impression (related to ICD-10 code)	✓	
Behavioral history	✓	✓
Observations of student behavior	√	√
List of assessment procedures and instruments used	√	√
Teacher/Guardian/Caregiver interviews	√	√

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## Adaptive Behavioral Assessment - Documentation

Component Required:	Required by Medicaid	Typically completed by BCBAs	
Professional's scoring of assessment	✓	√	
Interpretation of results/Data analysis	✓	√	
Discussion of findings & recommendations	✓	√	
Preparation of report	√	√	
CPT Code: Adaptive Behavior Assessment			

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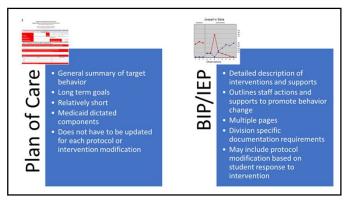


# Each student receiving Medicaid reimbursable services must have a Plan of Care



A Plan of Care (POC) is a required document for ongoing Adapted Behavior Treatment services delivered to a student.

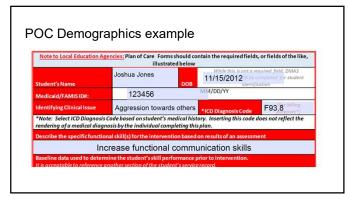
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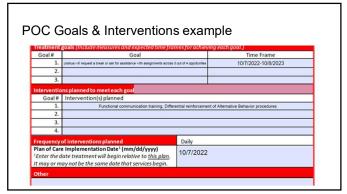


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# Sample Plan of Care







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### ICD-10, Diagnosis, Eligibility

- Codes are selected from the ICD-10 Manual
  - o International Classification of Diseases, 10th Edition
- Align ICD-10 Codes with diagnostic impression
- This is <u>NOT DIAGNOSING</u> an individual
- Use existing data (IEP, BIP, educational records, medical documentation, presenting issue) to make an informed decision

#### Determining an ICD-10 Code for billing purposes

- Codes are only for reimbursement purposes
- Codes selected must be related to the services being provided
  - o Speech services provided for student with Autism, or
  - o SLI-eligible student with behavior concerns

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## Case Study #1

A 12 year old student eligible for special education services for Speech-Language Impairment. He receives speech services under the ICD-10 code of F80.1 Expressive Language Disorder, and has recently started displaying behaviors that are impacting his learning. The BCBA interviews the parent and classroom teacher and conducts a classroom observation of the student, The BCBA writes several student specific recommendations and meets with the school team to review. The team decides that additional support from the BCBA is needed in developing strategies to address the challenging behavior and in training classroom staff in implementing these strategies. The BCBA may select another ICD-10 code for services provided to address the behavior concerns.

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### Finding ICD-10 Codes

- High frequency codes
- Most found under Mental, Behavior, and Neurodevelopmental Disorders
  - o F01-F99
  - o https://www.icd10data.com/ICD10CM/Codes/F01-F99
- Align with the treatment being provided

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ICD-10 Codes: Mental, Behavior, &	
Neurodevelopmental Disorders	
F70 Mild intellectual disabilities     F89 Unspecified disorder of psychological     F71 Moderate intellectual disabilities     development	
F72 Severe intellectual disabilities     F79 Attention-deficit hyperactivity     F73 Profound intellectual disabilities     disorders	
<ul> <li>F78 Other intellectual disabilities</li> <li>F79 Unspecified intellectual disabilities</li> <li>F80 Specific developmental disorders of</li> <li>F93 Emotional disorders with onset specific to childhood</li> </ul>	
speech and language F94 Disorders of social functioning with r81 Specific developmental disorders of scholastic skills adolescence	
F82 Specific developmental disorder of motor function  F95 Tic disorder  F98 Other behavioral and emotional	
F84 Pervasive developmental disorders disorders with onset usually occurring in F88 Other disorders of psychological childhood and adolescence development	
34	
Specific Billable Codes - Example  Code F84 - Pervasive Developmental Disorders  Considered a non-billable/non-specific code	
Should not be used for reimbursement purposes     Must select a billable/specific ICD code	
F84.0 Autistic disorder F84.2 Rett's syndrome F84.3 Other childhood disintegrative disorder	
F84.5 Asperger's syndrome	
F84.8 Other pervasive developmental disorders F84.9 Pervasive developmental disorder, unspecified	
35	
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Case Study #2 for ICD-10 code decisions	
·	
Student has both IDEA eligibility category of Autism & an	
outside diagnosis from a medical provider. The student is exhibiting SIB during school when any work task is presented	

or asked to transition from break to work table. FBA results

hypothesize an escape function to the behavior.

a halp protectly our privary,	CD-10 Code decision options:					
	EDMAS provider may choose ICD-10 code F84.0 Autistic Disorder eligibility documentation and/or medical diagnosis.					
presenting	2: DMAS provider may choose another ICD-10 code associated with challenging behaviors. For example: F93.8 Other childhood emotional disorders F93.9 Childhood emotional disorder, unspecified F98.9 Other specified behavioral and emotional disorders with onset usually occurring in childhood and adolescence F98.9 Unspecified behavioral and emotional disorders with onset usually occurring in childhood and adolescence F98.9 Unspecified behavioral and emotional disorders with onset usually occurring in childhood and adolescence					

## Explore ICD-10 Codes

#### Explore ICD-10 page

https://www.icd10data.com/ICD10CM/Codes/F01-F99

F99 - Conduct Disorder

F70 - Mild Intellectual Disability

F93 - Emotional Disorders with onset specific to childhood

F41 - Other Anxiety Disorders

#### Answer these questions

- 1. Is the code a billable/specific code? How do you know?
- If it is a non-billable/non-specific code, what are the billable/specific codes that you found?
- 3. What did you learn about navigating

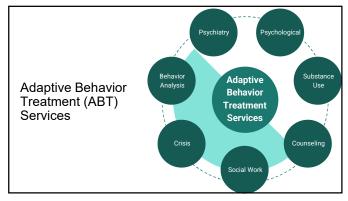
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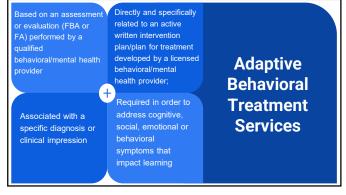
# Services, Supervision & Monitoring What are the expectations

for BCBAs to support implementation of ABT?

Chapter 4 of the DMAS Manual







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### Qualifying for Medicaid Reimbursement

- must be deemed "necessary" by a licensed provider in order to correct or improve an identified health condition
- In the school setting, such correction or improvement is often needed to ensure a student's safety, attendance and/or academic performance at school.
- Included in Plan of Care

# Unplanned Services- Behavioral Health Crisis Services

- Rendered by a licensed behavioral/mental health provider to a member student experiencing acute behavioral health symptoms requiring immediate attention
- De-escalation
- Crisis Management
- · Services to stabilize the individual

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Codes	Adaptive Behavior Treatment by Protocol	97154	
CPTC	Adaptive Behavior Treatment with Protocol Modification	97155	
and	ABT Guidance to Teacher or other Caregiver	97156	
ice Title	Group ABT by Protocol	97153	
Service	Group ABT with Protocol Modification	97158	

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# DMAS Manual Service Description: Adaptive Behavior Treatment by Protocol

- Administered by an LBA or LABA OR
- An unlicensed person
  - o performs the service according to a written protocol
  - o Protocol aligns with Plan of Care
- The licensed professional providing supervision must have developed the protocol or approved the written protocol
- LBA/LABA may or may not be on site during the treatment



#### Sample activities: ABT by Protocol

- Implementation of a Behavior Intervention Plan
- Implementation of other adaptive behavior protocols
  - o Functional Communication Training
  - Early Learner behaviors (scanning, visual discrimination, choice making, etc.)
  - o Task Analysis
  - o Implementation of token board
- Must align with goals identified in the plan of care
- Written protocol is separate document from the POC

CPT Code: Adaptive Behavior Treatment by Protocol

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# DMAS Manual Service Description: ABT with Protocol Modification

- Administered by LBA or LABA face-to-face with the student
- Must align with plan of care
- May include direction, coaching & modeling for an unlicensed professional to implement the protocol changes
  - The student may or may not be present for unlicensed training or modeling



CPT Code: ABT with Protocol Modification

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#### Sample Activities: ABT with Protocol Modification

- Updates to behavior intervention plans
- Updating programmatic changes (DTT, task analyses, etc.)
- Other adaptive behavior program modifications
- Directing and providing feedback to other staff on the procedure



CPT Code: ABT with Protocol Modification

# DMAS Manual Service Description: Adaptive Behavior Treatment Guidance to Teacher or Other Caregiver

- Student may or may not be present
- Scoring assessments, interpreting results, reviewing data
- Face to face interaction with teacher or other caregiver
- In class time coaching on procedures



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# Sample Activities: ABT Guidance to Teacher or Other Caregiver

- Student specific training on protocols relevant to the POC
  - Teachers and related service providers
  - o IAs
  - o Parents
- Examples include:
  - o Components of the BIP
  - o Procedures for reinforcing replacement behavior
  - Skill building to in sease access to academics

CPT Code: ABT Guidance to Teacher or other Caregiver

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#### DMAS Manual Service Description:

Group adaptive behavior treatment by protocol

- Services provided in a group setting but based on individual POC and protocol
- There must be two or more students participating,
- Based on written protocol that align with the plan of care
- The activities must involve face-to-face interaction with the student,
- Maximum group size is 8.



# Sample Activities: Group ABT by Protocol

- Services provided in a group setting, but based on individual POC
- Indicates that the provider (licensed or unlicensed) is working with multiple students at the same time and providing individualized support
- Activities of Daily Living (cooking, transitioning, organization)
- Community Based Instruction

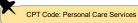


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## Personal Care Assistance (PCA) Services

- A range of personal assistance activities provided directly by a
  person to an identified student or group of students that enable
  the student(s) to meet fundamental needs and complete day-today tasks in order to participate in school.
- Billing code available to all medicaid providers
- Assistance may be in the form of hands-on assistance or cueing so that the student may perform day-to-day self-care tasks as independently as possible
- independently as possible.

  Existing Plans of Care written by other licensed professionals should and can remain with that professional



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# Reimbursement & RMTS

What are the reimbursement requirements for Medicaid? What is a Random Moment Time Study and how is it used for reimbursement?



#### Health Care Professionals working in Schools

- As a provider working under the scope of your license, you are a health care provider, providing services in an education setting.
- Anytime that you are wearing your discipline's "hat" remember that you are bringing your skills, training, experience and scope of license to the work that you are doing, including:
  - O Direct services with student(s)
  - O Preparation/planning for services and paperwork/follow-up activities related to services (report writing, documentation, etc.)
  - Bringing our skills/training/license to contribute to a meeting, consultation, communication, coordination, training and other similar activities.
- When you are doing an activity that can be done by an unlicensed provider (lunch duty, bus duty, teaching, etc.), this is considered educational.
- It's important to keep your role as a health care professional in mind when responding to the RMTS.



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### Did you know?

- The Random Moment Time Study (RMTS) determines how much federal funding your school division is eligible to receive through the Medicaid and Schools program.
- Reimbursement is not based on "billing" for services.
- Reimbursement is based on how all the school-based staff across the state answer their "moments."
- RMTS is actually a statewide group project! The responses from each individual staff member impact reimbursement for your school division, and for all school divisions in the state!



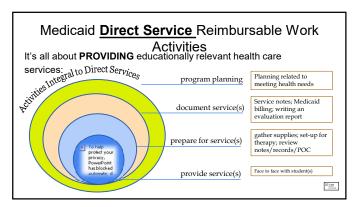
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# Health-Related work activities go far beyond time spent directly with students

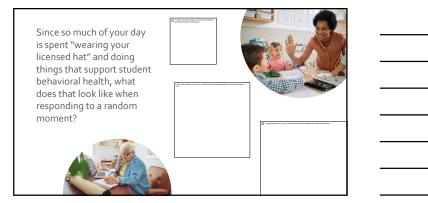
Reimbursable work activities are generally categorized for Medicaid purposes into two categories:

- Direct health care services, including all components that are integral to the delivery of services
- Medicaid "Administrative" activities

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#### Vignette 1: Assessing/evaluating a student

- Behavior analysts evaluate a student's behavior in the school environment to assess whether the student is functioning at an age-appropriate developmental stage for various skills.
- As a Licensed Behavior Analyst, you are providing the evaluation service under your scope and standards of practice.
- These are skilled health-related services.

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### Vignette 1: Assessing/evaluating a student

- Working with student(s) regarding EDUCATION / ACADEMICS skills / issues / needs
   Working with student(s) regarding EDUCATION / ACADEMICS skills / issues / needs
   DE What specifically, were you deling?
   AT EACHING TO tutoring an academic subject
   D COUNSELING services for EDUCATIONAL, ACADEMIC or SOCIAL needs (including course selection, schedule changes, career or college counseling, etc.)
   C ACADEMIC TESTING (includes proctoring AP exams, statewide testing, etc.)
   d) Other cholices.

a) Working with student(s) regarding **HEALTH CARE** (e.g., PT, OT, SPL, Nursing, dental, vision, hearing, mental and/or behavioral health)

health)

22. What, specifically, were you doing?

3) Providing MENTAL or BEHAVIORAL HEALTH Counseling Service / Intervention or Evaluation (includes adaptive behavior treatment and substance use disorder treatment)

b) Providing CRISIS INTERVENTION services for urgent HEALTH needs (for example: suicide risk or threat assessment, overdose, urgent behavioral or physical health interventions)

C) OBSERVATION of student(s) for the purpose of assessing HEALTH-related needs (PT, OT, SPL, psychological, etc.)

d) Other choices...

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#### Vignette 1: Assessing/evaluating a student

Q3: Was this activity pursuant to a student's IEP?

- a)Yes, my work activity was pursuant to a student's IEP
- b) No, my work activity was not pursuant to a student's IEP

Q4: Who were you working or interacting with?

- a)Student(s)
- b) Student(s) and School Staff
- C)Other choices...

- This was an INITIAL EVALUATION of a student to determine if mental/behavioral health-related services are needed, which I performed within the scope of practice allowed by my clinical license.

  | Net VALUATION FOR DETERMINATION TO CONTINUE IES PSERVICES OR BIOSCHARGE: and/or to adjust the plan of care or treatment plan, which I performed within the scope of practice allowed by my clinical license.

  - C) Other choices...

#### Vignette 2: Consultation with a teacher

- School behavioral health professionals collaborate and consult with other professionals in the school, such as teachers and administrators, to help support student behavioral health.
- When consulting with a teacher, it's important to clearly identify whether you are truly:
  - O mentoring/modeling teaching practices to improve behavior (discipline) management of their classroom, or
  - O Modeling behavior interventions for a teacher or behavior tech to ensure proper implementation of an intervention plan, or
  - O Observing students in the classroom through the lens of your expertise and training for the purpose of identification of need for implementation of MTSS or other interventions or determine the need for further assessment or evaluation.



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### Vignette 2: Consultation with a teacher

#### Q1: What type of activity were you doing?

- a) Planning or participating in MEETING / CONVERSATION regarding SPECIFIC STUDENT(S), including phone and email conversations
  - Q2: What, specifically, were you doing?
    - a) EDUCATIONAL, ACADEMIC, VOCATIONAL or SOCIAL services FOCUS: any other MEETING
       / COMMUNICATION / CONSULTATION regarding EDUCATIONAL OR ACADEMIC issues for
       a specific student (other than an IEP or Section 504 meeting)



- b) HEALTH-related FOCUS: any other MEETING / COMMUNICATION / CONSULTATION regarding HEALTH / MEDICAL issues for a specific student (other than an IEP / IFSP or Section 504 meeting)
  - c) None of the above (after selecting this response, a text box will open for you to type your
  - d) Other choices...

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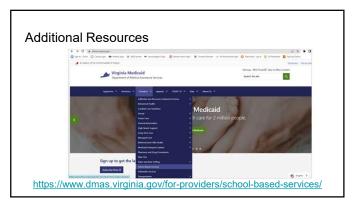
# Vignette 2: Consultation with a teacher – clinical supervision/BIP oversight

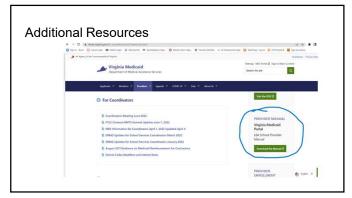
If you're directly performing interventions with the student while modeling for the  $teacher/assistant/behavior\ tech,\ then\ the\ primary\ activity\ occurring\ is\ the\ delivery\ of\ a$ health care service.

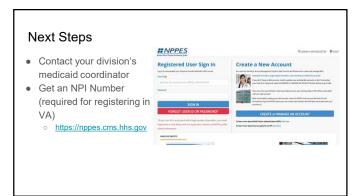
#### Q1: What type of activity were you doing?

- a) Working with student(s) regarding HEALTH CARE (e.g., PT, OT, SPL, Nursing, dental, vision, hearing, mental and/or behavioral health)
  - Q2: What, specifically, were you doing?
  - a) Providing AUDIOLOGY service or evaluation b) Providing OCCUPATIONAL or PHYSICAL THERAPY service or evaluation
- c) Providing SPEECH-LANGUAGE THERAPY service or evaluation
  - d) OBSERVATION of student(s) for the purpose of assessing HEALTH-related needs (PT, OT, SPL, psychological, etc.)
  - e) Other choices...









# Thank you for your attention and participation in this training.

For lingering questions, please contact

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