

## Provider Notice

To: Capital Area BHRS Providers and non-licensed entities providing BSC-ASD and TSS services

From: Scott Daubert, PhD, VP Operations

Date: Revised May 1, 2019  
(original July 1, 2018)

Subject: BHRS 18 100 Differential Reimbursement of TSS with the RBT Credential  
(revised)

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**5/1/19: The original Provider Notice BHRS 18 100 and this revision is currently limited to Members who are served under the Capital Area contract (Cumberland, Dauphin, Lancaster, Lebanon, Perry counties). Providers have asked for clarification from PerformCare regarding three issues:**

- **What constitutes case supervision of the TSS/RBT by the BCBA?**
- **Would PerformCare recognize the BCaBA credential as appropriate to provide the case supervision of the TSS/RBT?**
- **What level of BSC-ASD services for the Member's case are required to be directly provided by the BCBA?**

**According to the Behavior Analyst Certification Board (BACB), the following individuals can provide case supervision for the RBT:**

- a. BCBA/BCBA-D OR**
- b. BCaBA OR**
- c. An individual licensed in another behavioral health profession that has applied behavior analysis in its legislative scope of practice and who is competent in applied behavior analysis\***

**Effective for dates of service on or after the date of this revised Provider Notice BHRS 18 100, PerformCare will adopt the BACB criteria for appropriate supervisors. Agencies can bill the TSS/RBT services with the RBT billing modifier and rate when supervision is delivered by such individuals. Thus, PerformCare will recognize BCBA, BCBA-D, and BCaBA as meeting the supervisory requirements. For an individual meeting c. above but is not a BCBA, BCBA-D, or BCaBA, PerformCare will follow the BACB requirements:**

**\* The BACB lists examples for what this may be in the drop down for "Licensee Type" on the Noncertified RBT Supervisor Form. These include:**

- Psychologist
- School Psychologist
- Clinical Social Worker
- Mental Health Counselor
- Marriage & Family Therapist

- Other (please specify)

It is up to the provider, and specifically the BCBA/BCBA-D that is the Requirements Coordinator for this individual, who will decide if they are qualified to provide supervision. An attestation to BACB must be confirmed by the RBT Requirements Coordinator confirming ABA is within the Supervisor's scope of *competence & practice*.

It is PerformCare's view that a Licensed Behavior Specialist could qualify under "Other" IF the attestation is completed by the RBT Requirement Coordinator who confirms:

- ABA is within supervisor's scope of competence (university training, supervised experience)
- ABA is within scope of practice of supervisor's license

Also, effective as of the date of this notice, in order to most effectively utilize the BCBA/BCBA-D, BcaBA, or licensed individual, PerformCare will consider adequate direct involvement in the case for RBT billing to consist of the following minimum requirements:

- a. Lead development and writing of the treatment plan (including signature). Treatment plan development can involve additional team members.
- b. Directly oversee the treatment and directly supervise the RBT staff in accordance with the defined RBT supervision requirements.
- c. Provide routine on-site support to each TSS/RBT during treatment delivery at least once per month.
- d. The BCBA/BCBA-D providing supervision can personally deliver, but is not required to deliver, additional prescribed BSC services. In addition to the TSS/RBT service oversight, the BCBA/BCBA-D should assure that BSC services are delivered in accordance with the prescription and the treatment plan.

The revised requirements in this 5/1/19 revision presumes that all additional state and federal Medicaid requirements for delivery of BHRS are also met.

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#### ORIGINAL PROVIDER NOTICE 18 100

7/1/18

The following information is currently limited to Members who are served under the Capital Area contract (Cumberland, Dauphin, Lancaster, Lebanon, Perry counties).

For applied behavior analysis (ABA) service delivery for children with Autism Spectrum Disorder (ASD) diagnoses, the Registered Behavior Technician™ (RBT) is an additional credential that can be obtained by individuals working as Therapeutic Staff Support (TSS). The RBT is a paraprofessional who practices under the close, ongoing supervision of a Board Certified Behavior Analyst (BCBA). Both the BCBA and RBT credentials are administered by the Behavior Analyst Certification Board. In recognition of the additional training and BCBA supervision associated with the RBT credential, PerformCare is establishing a distinct CPT Code / Modifier combination and enhanced rates for TSS/RBT that can be billed to PerformCare under the following conditions:

- The primary diagnosis meets the definition of accepted HealthChoices encounters for Autism Spectrum Disorder
  - F84.0 Autistic disorder
  - F84.5 Asperger's syndrome
  - F84.9 Pervasive developmental disorder, unspecified

- The BSC-ASD services for the Member’s case are directly provided by a BCBA, who also provides the case supervision to the TSS/RBT.
- The TSS/RBT is implementing a treatment plan that is focused on Applied Behavior Analysis (ABA).
- Minimum staff qualifications continue to be met for TSS.\*

\*If BHRS or non-licensed entities would like to seek approval for use of RBT staff who hold the credential, but do not meet the educational or experience requirements for TSS, this would be supported by PerformCare, but it would require a specific Service Description revision that would then be submitted for approval to the Office of Mental Health and Substance Abuse Services (OMHSAS).

Minimum TSS qualifications and other associated requirements for TSS and ABA delivery are outlined in the following state documents:

- MAB 01-94-01, “Outpatient Psychiatric Services for Children Under 21 Years of Age,” issued January 11, 1994.
- MAB 01-01-05, “Revisions to Policies and Procedures Relating to Mobile Therapy, Behavioral Specialist Consultant and Therapeutic Staff Support Services,” issued June 1, 2001.
- OMHSAS-09-01, “Guidance for Conducting Functional Behavioral Assessments in the Development of Treatment Plans for Services Delivered to Children with Behavioral Needs Compounded by Developmental Disorders,” issued January 1, 2009.
- OMHSAS-14-02, “Enrollment and Payment of Licensed Providers that Provide Behavior Specialist Consultant Services to Child with Autism Spectrum Disorders,” issued May 23, 2014.
- OMHSAS-16-02, “Training and Supervision Requirements for Therapeutic Staff Support Workers that Implement Treatment Plans that Include Applied Behavioral Analysis,” issued March 11, 2016.
- OMHSAS-16-04, “Training Requirements for Licensed Behavior Specialists Who Use Behavioral Specialist Consultant-Autism Spectrum Disorder Services to Provide Applied Behavioral Analysis,” issued April 26, 2016.
- OMHSAS-16-07, “Enrollment and Payment of Provider Entities that Do Not Have a License to Provide Outpatient, Partial Hospitalization, or Family Based Mental Health Services to Use Behavioral Specialist Consultant Services and Therapeutic Staff Support Services to Provide Applied Behavioral Analysis to Children with Autism Spectrum Disorders,” issued June 6, 2016.
- OMHSAS-17-01, “Reissue of Medical Necessity Guidelines for Applied Behavioral Analysis Using Behavioral Specialist Consultant-Autism Spectrum Disorder and Therapeutic Staff Services,” issued January 13, 2017.

- OMHSAS-17-02, “Applied Behavioral Analysis Using Behavioral Specialist Consultant-Autism Spectrum Disorder and Therapeutic Staff Services,” issued January 13, 2017.

Billing for TSS-ABA when conducted by an RBT should use the CPT/Modifier combinations indicated on Table 1 on the following page. The base rate effective July 1, 2018 will be \$12.50 per 15 minute unit.

Table 1: TSS/RBT Procedure Codes and Modifiers

Pvr Type	Specialty	Proc. Code	Modifier 1	Modifier 2	Modifier 3	Modifier 4	Service Description	Units	Place of Service	Effective Date
<b>Licensed Entities - RBT(TSS)-ASD-ABA</b>										
08	800, 804, or 808	H2021	EP	HW	HA		Registered Behavior Technician (RBT-ASD-ABA)	15 min	03, 12, 23, 99	7/1/18
09	548	H2021	EP	HW	HA		Registered Behavior Technician (RBT-ASD-ABA)	15 min	03, 12, 23, 99	7/1/18
11	442, 446, 450, or 548	H2021	EP	HW	HA		Registered Behavior Technician (RBT-ASD-ABA)	15 min	03, 12, 23, 99	7/1/18
19	548	H2021	EP	HW	HA		Registered Behavior Technician (RBT-ASD-ABA)	15 min	03, 12, 23, 99	7/1/18
31	548	H2021	EP	HW	HA		Registered Behavior Technician (RBT-ASD-ABA)	15 min	03, 12, 23, 99	7/1/18
08	800, 804, or 808	H2021	EP	HW	HA	U4	Registered Behavior Technician (RBT-ASD-ABA) with interpreter	15 min	03, 12, 23, 99	7/1/18
09	548	H2021	EP	HW	HA	U4	Registered Behavior Technician (RBT-ASD-ABA) with interpreter	15 min	03, 12, 23, 99	7/1/18
11	442, 446, 450, or 548	H2021	EP	HW	HA	U4	Registered Behavior Technician (RBT-ASD-ABA) with interpreter	15 min	03, 12, 23, 99	7/1/18
19	548	H2021	EP	HW	HA	U4	Registered Behavior Technician (RBT-ASD-ABA) with interpreter	15 min	03, 12, 23, 99	7/1/18
31	548	H2021	EP	HW	HA	U4	Registered Behavior Technician (RBT-ASD-ABA) with interpreter	15 min	03, 12, 23, 99	7/1/18

Non-Licensed Entities - RBT(TSS)-ASD-ABA										
11	562	H2021	EP	HW	HA		Registered Behavior Technician (RBT-ASD-ABA)	15 min	03, 12, 23, 99	7/1/18
11	562	H2021	EP	HW	HA	U4	Registered Behavior Technician (RBT-ASD-ABA) with interpreter	15 min	03, 12, 23, 99	7/1/18

cc: James Laughman, PerformCare  
 Scott Suhring, Capital Area Behavioral Health Collaborative  
 PerformCare Account Executives