

Provider Notice

To: **IBHS Providers**
 From: **Dan Eisenhauer, Director of Operations**
 Date: **March 3, 2021**
 Subject: **IBHS 21 102 IBHS Billable Activity**

This Provider Notice serves to clarify billable activities for Intensive Behavioral Health Services (IBHS) in response to provider questions generally centered on whether non face to face activities are billable under IBHS Individual, IBHS Group, and ABA billing codes.

Providers have also raised similar questions to OMHSAS. OMHSAS reissued their IBHS FAQ dated 2/9/2021, which includes the below question and answer.

5. Why can providers of behavior consultation-ABA services bill for indirect activities, including data analysis, but providers of behavior consultation services cannot bill for these activities?

The national ABA codes include codes that allow for billing of activities, such as data analysis, which was taken into account in the development of the ABA rates. While providers of behavior consultation services cannot bill directly for activities such as data collection, documentation, and staff oversight, the time associated with these activities was taken into account when the fee schedule rate for behavior consultation services was developed.

As indicated in Provider Notice IBHS 21 100 ABA CPT Billing Guide, PerformCare has adopted the 2019 CPT supplemental guidance for ABA codes. Please note that TMCA, CABHC and PerformCare used the same assumptions as OMHSAS in setting our IBHS fee schedule rates. Both TMCA and CABHC adjusted IBHS rates compared to BHRS rates to incorporate additional requirements under IBHS regulations and billable activity assumptions consistent with the OMHSAS FFS rates published in OMHSAS Bulletin 20-01 and OMHSAS-21-03. Please note that telephone services are not billable for IBHS except for telehealth during the COVID 19 Public Health Emergency.

A summary of billing codes and guidelines for ABA and IBHS Individual and Group are:

IBHS Individual Services		
Core Code	Assumption	Exclusion
H0031 Mental health assessment by non-physician	Includes face to face with member, guardian/caregiver, face to face with other relevant team members, observation, data collection, use of standardized tools	Non face to face, write up and written order update all non-billable
H0032 Behavior Consultation Service	Includes face to face, consultation with team members, attendance at meetings, development of treatment plan (including observations, behavior tracking, defining antecedents and consequences etc.), other standardized tools.	Not inclusive of writing the treatment plan or online research for treatment plan development. Training and research is not billable. Role of consultant is to give information to team.

IBHS Individual Services		
H2019 Mobile Therapy	Includes face to face individual and family therapy, development of treatment plan (including observations, behavior tracking, defining antecedents and consequences etc.); crisis stabilization, and addressing problems the youth has encountered; attending team meetings when family, youth or external team member is present for coordination and treatment plan development. Can be provided to siblings only as it relates to identified members treatment goals.	Not inclusive of writing the treatment plan or online research for treatment plan development. Training and research is not billable.
H2021 Behavioral Health Technician Service	Includes face to face with child to implement treatment plan	
H2014 Non ABA Behavioral Health Technician Assessment & Assistance Supervision	Skills training and development for newly hired BHT for a maximum of 6 hours for skill development; monitoring the BHT workers interventions and interaction with the child/adolescent. The service must be provided on-site in the course of delivering authorized BHT services to an eligible Member by a qualified supervisor prior to the BHT staff working alone with a child/adolescent Member.	
IBHS Group Services		
H2021 HQ Any IBHS Group Service	Member needs to be present for each unit billed; clear therapeutic objectives for each group session that correlate to members treatment plan; includes family therapy sessions onsite Note: Family therapy must be specific to the IP	Does not include time for meals, purely recreational activities, breaks
ABA Individual and Group		
97151	Behavior identification assessment, administered by a physician or other qualified health care professional, each 15 minutes of the physician's or other qualified health care professional's time face-to-face with patient and/or guardian(s)/caregiver(s) administering assessments and discussing findings and recommendations, and non-face-to-face analyzing past data, scoring/interpreting the assessment, and preparing the report/treatment plan	See Supplemental Guidance On Interpreting And Applying The 2019 CPT Codes For Adaptive Behavior Services January 2019 for further clarification
97152	Behavior identification supporting assessment, administered by one technician under the direction of a physician or other qualified health care professional, face-to-face with the patient, each 15 minutes	See Supplemental Guidance On Interpreting And Applying The 2019 CPT Codes For Adaptive Behavior Services January 2019 for further clarification
97153	Adaptive behavior treatment by protocol, administered by technician under the direction of a physician or other qualified health care professional, face-to-face with one patient, each 15 minutes	See Supplemental Guidance On Interpreting And Applying The 2019 CPT Codes For Adaptive Behavior Services January 2019 for further clarification
97154	Group adaptive behavior treatment by protocol, administered by technician under the direction of a physician or other qualified health care professional, face-to-face with two or more patients, each 15 minutes	See Supplemental Guidance On Interpreting And Applying The 2019 CPT Codes For Adaptive Behavior Services January 2019 for further clarification

ABA Individual and Group		
97155	Adaptive behavior treatment with protocol modification administered by physician or other qualified health care professional, which may include simultaneous direction of technician, face-to-face with one patient, each 15 minutes	See Supplemental Guidance On Interpreting And Applying The 2019 CPT Codes For Adaptive Behavior Services January 2019 for further clarification
97156	Family adaptive behavior treatment guidance, administered by physician or other qualified health care professional (with or without the patient present), face-to-face with guardian(s)/caregiver(s), each 15 minutes	See Supplemental Guidance On Interpreting And Applying The 2019 CPT Codes For Adaptive Behavior Services January 2019 for further clarification
97158	Group adaptive behavior treatment with protocol modification, administered by physician or other qualified health care professional face-to-face with multiple patients, each 15 minutes	See Supplemental Guidance On Interpreting And Applying The 2019 CPT Codes For Adaptive Behavior Services January 2019 for further clarification

PerformCare will continue to provide updates and information on the implementation of IBHS including distributing and posting our IBHS policies and procedures upon approval by OMHSAS. As with all HealthChoices funded services, PerformCare will monitor and evaluate the adequacy of IBHS rates.

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