

IBHS-ABA Tour Q&A

1. TREATMENT PLANS

- ➔ Does the teacher need to sign a treatment plan?
 - » In addition to all required signatures, it is best practice to have others contributing to treatment sign the plan.
- ➔ For larger agencies, can there be more than clinical director?
 - » Yes
- ➔ Is the requirement a clinical director or an individual who is qualified to be a clinical director signs treatment plans?
 - » Per MA regulation § 1155.33. Payment conditions for ABA services....(5) The ITP and all updates have been reviewed and signed by the youth, young adult, or parent or legal guardian of the child or youth, the staff person who completed the ITP and an individual who meets the qualifications of a clinical director in § 5240.81 (relating to staff qualifications for ABA services).
 - » Because it is not always possible to determine whether an individual is qualified to sign the treatment plan based on signature alone, it is helpful to denote their position in addition to the signature
- ➔ Do BHT sign or just BC?
 - » Per the CBH ABA Performance Standards, “It is best practice for treatment plans to be signed by all parties who participated in the development or updating of the plan”. It is also recommended that BHTs sign the plan as part of the treatment team.
- ➔ If there is a change of staff fulfilling a role within the plan time frame, does the new staff member sign?
 - » Yes, the new person should sign the treatment plan.

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- ➔ In regard to sufficiency of interventions on treatment plans, what were some observations from the ABA tour?
 - » In regard to best practices but not necessarily a tour trend, generic language of “work with child” and “supervise child”, is not sufficient.

2. BILLING OF SERVICES

- ➔ Was billing incorrect service code a trend in tour?
 - » No, not as a tour trend but there could have been provider specific instances.
- ➔ Can the FQ modifier be used for ABA services? A provider gave the example, typically with parent for parent training.
 - » Yes, FQ can be used for telephone interactions. Audio-only services should be rare and would be a red flag if CBH notes frequent usage in IBHS-ABA. It must be clinically justifiable.

3. SUPERVISION

- ➔ Who provides supervision for a clinical director who also has a caseload?
 - » Providers need a protocol for peer supervision of the clinical director(s). OMHSAS July 2021 FAQ discusses that situation.
 - <https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/mental-health-in-pa/documents/ibhs-documents/IBHS%20FAQ%207.21.21.pdf>

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4. SUGGESTIONS FOR FUTURE GUIDANCE

- ➔ Update the IBHS Billing Guide. ABA is still really confusing. There are many procedure codes and names are not common language. It is difficult to crosswalk from billing guide to schedule A because there is reuse of procedure codes.
- ➔ CBH Program Integrity asks providers to email any specific questions to be included in the update to the billing guide. CBH.ComplianceContact@phila.gov