

## MEDICAID POLICY INFORMATION SHEET

**Policy Analyst:** Matthew Hambleton

**Phone Number:** 517-284-1209

Initial ☐

Public Comment ☒

Final ☐

### Brief description of policy:

Behavioral health treatment (BHT) services must be provided under the direction of a Board Certified Behavior Analyst (BCBA), another appropriately qualified Licensed Psychologist (LP) or Limited License Psychologist (LLP), or a master's prepared Qualified Behavioral Health Professional (QBHP). Current policy indicates BHT supervisors including LPs, LLPs, and QBHPs must be certified as a BCBA by September 30, 2020. This policy deadline is being extended to a date to be determined by the Michigan Department of Health and Human Services (MDHHS) Behavioral Health and Developmental Disabilities Administration (BHDDA).

### Reason for policy (problem being addressed):

BHDDA recently completed a statewide applied behavior analysis provider capacity survey of the Prepaid Inpatient Health Plan (PIHP)/Community Mental Health Services Program (CMHSP) system and is forecasting a provider network shortage that will negatively affect access, quality, and compliance of autism spectrum disorder benefit services.

### Budget implication:

☒ budget neutral

☐ will cost MDHHS \$ , and (select one) budgeted in current appropriation

☐ will save MDHHS \$

### Is this policy change mandated per federal requirements?

No

### Does policy have operational implications on other parts of MDHHS?

No

### Does policy have operational implications on other departments?

No

### Summary of input:

☐ controversial

☐ acceptable to most/all groups

☐ limited public interest/comment

### Supporting Documentation:

State Plan Amendment Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, please provide status: <input type="checkbox"/> Approved <input type="checkbox"/> Pending <input type="checkbox"/> Denied Date: Approval Date:	Public Notice Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, Submission Date:
--	--

<b>DRAFT FOR PUBLIC COMMENT</b>  <b>Michigan Department of Health and Human Services</b>		
	<b>Project Number:</b> 1911-Autism	<b>Date:</b> May 20, 2019

**Comments Due:** June 24, 2019  
**Proposed Effective Date:** September 1, 2019  
**Direct Comments To:** Matthew Hambleton  
**Address:** Program Policy Division/MDHHS/MSA/CCC 7<sup>th</sup> Floor  
**E-Mail Address:** [hambletonm@michigan.gov](mailto:hambletonm@michigan.gov)  
**Phone:** 517-284-1209 **Fax:** 517-241-8969

**Policy Subject:** Update of Coverage of Autism Services for Children Under 21 Years of Age

**Affected Programs:** Medicaid, Healthy Michigan Plan, MIChild

**Distribution:** Practitioners, Local Health Departments, Federally Qualified Health Centers, Rural Health Clinics, Medicaid Health Plans, Tribal Health Centers, Prepaid Inpatient Health Plans (PIHPs), Community Mental Health Services Programs (CMHSPs)

**Summary:** Behavioral health treatment (BHT) services must be provided under the direction of a Board Certified Behavior Analyst (BCBA), another appropriately qualified Licensed Psychologist (LP) or Limited License Psychologist (LLP), or a master's prepared Qualified Behavioral Health Professional (QBHP). Current policy indicates BHT supervisors including LPs, LLPs, and QBHPs must be certified as a BCBA by September 30, 2020. This policy deadline is being extended to a date to be determined by the Michigan Department of Health and Human Services (MDHHS) Behavioral Health and Developmental Disabilities Administration (BHDDA).

**Purpose:** BHDDA recently completed a statewide applied behavior analysis (ABA) provider capacity survey of the PIHP/CMHSP system and is forecasting a provider network shortage that will negatively affect access, quality, and compliance of autism spectrum disorder (ASD) benefit services.

**Cost Implications:** Budget neutral

**Potential Hearings & Appeal Issues:** Minimal

**State Plan Amendment Required:** Yes ☐ No ☒  
**If yes, date submitted:**

**Public Notice Required:** Yes ☐ No ☒  
**Submitted date:**

**Tribal Notification:** Yes ☐ No ☒ - **Date:**

**THIS SECTION COMPLETED BY RECEIVER**

<input type="checkbox"/> <b>Approved</b>	<input type="checkbox"/> <b>No Comments</b>
	<input type="checkbox"/> <b>See Comments Below</b>
<input type="checkbox"/> <b>Disapproved</b>	<input type="checkbox"/> <b>See Comments in Text</b>

<b>Signature:</b>	<b>Phone Number</b>
<b>Signature Printed:</b>	
<b>Bureau/Administration</b> <i>(please print)</i>	<b>Date</b>

Comment001

Revised 6/16

# Proposed Policy Draft

Michigan Department of Health and Human Services  
Medical Services Administration

**Distribution:** Practitioners, Local Health Departments, Federally Qualified Health Centers, Rural Health Clinics, Medicaid Health Plans, Tribal Health Centers, Prepaid Inpatient Health Plans (PIHPs), Community Mental Health Services Programs (CMHSPs)

**Issued:** August 1, 2019 (Proposed)

**Subject:** Update of Coverage of Autism Services for Children Under 21 Years of Age

**Effective:** September 1, 2019 (Proposed)

**Programs Affected:** Medicaid, Healthy Michigan Plan, MICHild

Behavioral health treatment (BHT) services are highly specialized services that require specific qualified providers who are available within Prepaid Inpatient Health Plan (PIHP)/Community Mental Health Services Program (CMHSP) provider networks and have extensive experience providing specialty mental health and behavioral health services. BHT services must be provided under the direction of a Board Certified Behavior Analyst (BCBA), a qualified Licensed Psychologist (LP) or Limited License Psychologist (LLP), or a master's prepared Qualified Behavioral Health Professional (QBHP).

The Michigan Department of Health and Human Services (MDHHS) Behavioral Health and Developmental Disabilities Administration (BHDDA) recently completed a statewide applied behavior analysis provider capacity survey of the PIHP/CMHSP system and is forecasting a provider network shortage that will negatively affect access, quality, and compliance of autism spectrum disorder benefit services. Current policy indicates BHT supervisors, including LPs, LLPs, and QBHPs, must be certified as a BCBA by September 30, 2020. This policy deadline is being extended to a date to be determined by BHDDA to ensure there is adequate access to a network of providers of BHT services.