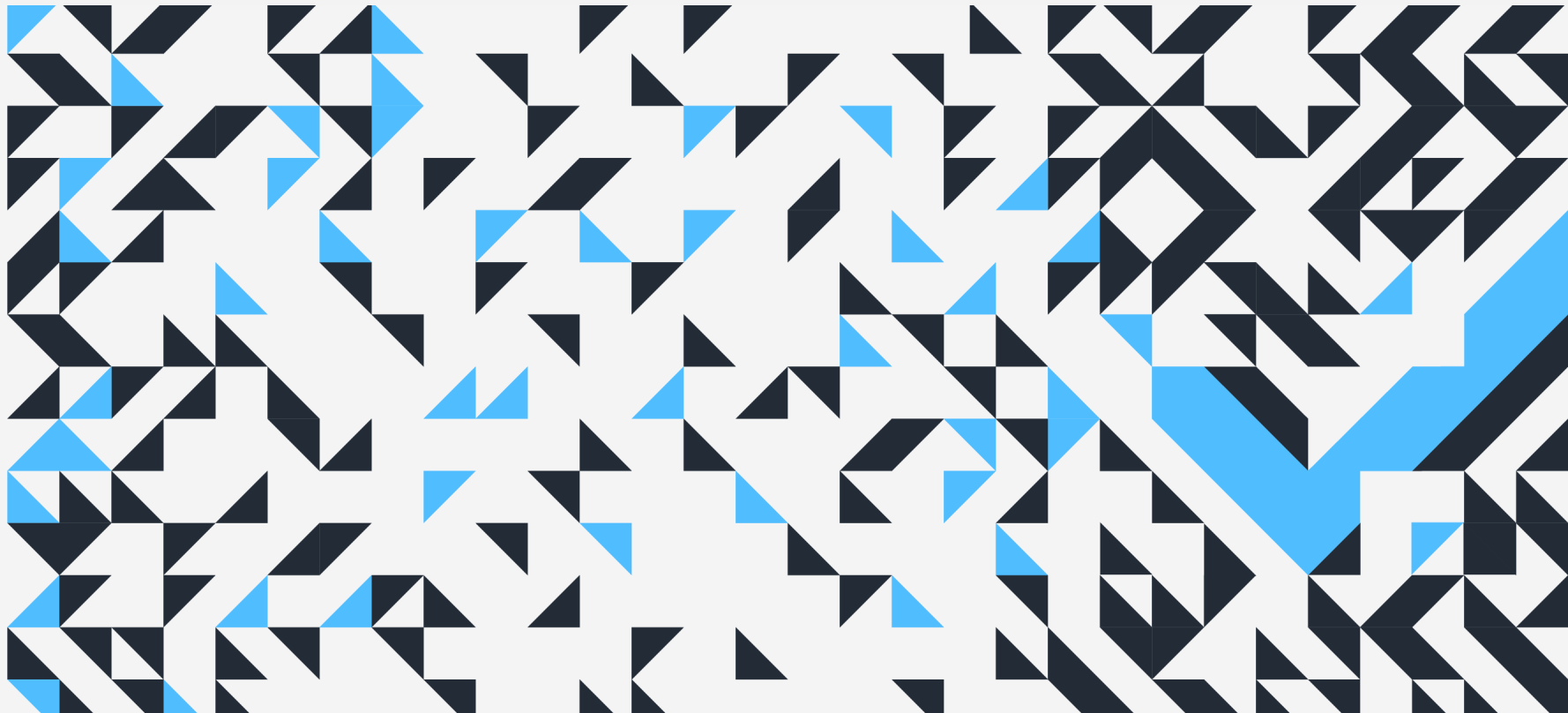


Applied Behavior Analysis Rate Study: Stakeholder Meeting #3



State of Hawai'i Med-QUEST Division (MQD)

December 4th, 2023



Agenda

- **Project Overview**
- **Stakeholder Input**
- **Overview of Comparison Rate Development Approach**
- **Review of Service Assumptions**
- **Draft Rate Calculations**
- **Project Next Steps**
- *Appendix A: Service Definition*
- *Appendix B: BLS Occupational Code Descriptions*
- *Appendix C: Rate Benchmarks*

Project Overview

ABA Rate Study Project Overview



Project Background:

- The State of Hawai`i Med-QUEST Division (MQD) is conducting an Applied Behavior Analysis (ABA) services rate study for its Medicaid program. The project will provide better insight into the current costs associated with service delivery and staffing requirements.
- MQD intends to align the ABA rate study efforts with its on-going Medicaid home-and-community based services (HCBS) rate studies, which were also requested by the legislature (Phase I HCBS rate study report was submitted by MQD before the 2023 legislative session).
- This work is in compliance with Hawai`i State Legislature's House Resolution #207 passed in 2023, which requests the Department of Human Services to conduct an ABA rate study and "submit a report of its findings and recommendations on appropriate reimbursement rate increases".⁽¹⁾

¹Source: SCR 132 - Requesting the Department of Human Services' Med-quest Division to Take Steps Necessary to Ensure That Adequate Provider Rates are Established for Applied Behavior Analysis Services. State of Hawai'i: Department Of Human Services. 2023. Retrieved from: https://www.capitol.hawaii.gov/session/measure_indiv.aspx?billtype=SCR&billnumber=132&year=2023

ABA Rate Study Overview



The Hawai'i ABA Rate Study includes the following services:

- 97151 - Behavior Identification Assessment
- 91752 - Behavior Identification Supporting Assessment - *observational assessment of behavioral functioning*
- 0362T - Behavior Identification Supporting Assessment - *exposure behavioral follow-up assessment*
- 97153 - Direct Treatment by Protocol
- 97154 - Group Treatment by Protocol
- 97155 - Direct Treatment with Protocol Modification
- 97156 - Family Training
- 97157 - Multiple-Family Training
- 97158 - Group Treatment with Protocol Modification
- 0373T - Direct Treatment of Severe Maladaptive Behavior

As a result of the rate study, we will develop a range for “comparison” payment rates for MQD and the legislature’s consideration. Any funding increases will need to be appropriated by the state legislature in order to be implemented. If approved, final comparison rates will be published for the use of providers and managed care organizations (MCOs) to consider when negotiating managed care contracts, and for MQD and other stakeholders to use when evaluating changes to overall funding.

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Stakeholder Input

ABA Provider Cost and Wage Survey

Survey Purpose and Timeframe

Purpose: Collect information on provider wages and costs to inform comparison rate assumptions

Timeframe for Reporting: Snapshot in time (e.g., average hourly wage) and others will require looking at one year's worth of data (e.g., administrative and program support costs for the most recent provider fiscal year end).

Survey Administration: Providers were given approximately three weeks to complete the survey, inclusive of a one week extension.

Support included:

Survey walkthrough
recorded session
posted on MQD website

Survey tool instructions
document posted on MQD
website

Dedicated email inbox for
questions

Provider Survey Data Results

Total of 20 surveys were submitted by providers; the following survey results were considered when developing specific rate assumptions

ABA Staff Information (for a single FTE)	Number of Observations	Average
PTO - Annual Hours	16	130
Training - Annual hours	18	93
Non-Client Facing Time - Annual Hours	16	328
Annual Turnover Rate	13	32%

Notes:

- A single survey submitted may represent a single provider entity or multiple provider entities.
- We removed outliers for the turnover rate for data above 50%.
- Results with fewer than 5 survey responses were excluded.
- PTO, training, and non-client facing hours reflect Board Certified Behavior Analyst® (BCBA), Board Certified Assistant Behavior Analyst® (BCaBA), and Registered Behavior Technician® (RBT) staff time reported. Staff hours average reported as of September 1st, 2023, converted to annual hours for comparison purposes.
- Outliers above 100 hours a month of non-client facing time were removed. The average reflects BCBA, BCaBA, and RBT hours.

Provider Survey Data Results - Cont'd

ABA Program Expenses*	Number of Observations	Average
Employee Related Expenses (ERE)	15	21.85%
Transportation Related Expenses	15	0.51%
Admin and Program Support Expenses	15	17.26%

Total of 20 surveys were submitted by providers; survey results were considered when developing employee related expenses, transportation, and administrative and program support expenses. Transportation costs were included in the administrative/program support costs as part of comparison rate buildup.

** Note:*

- ERE percentage = ERE costs / Direct care salaries and wages. Outliers above 50% were removed.*
- Transportation expenses percentage = transportation costs / (total costs – non allowable costs)*
- Admin and Program support expenses percentage = Admin and Program support costs / (total costs – non allowable costs)*

Provider Survey Data Results - Cont'd

Summary of Wage Analysis:

Providers were asked to provide staff data as of 9/1/2023, major takeaways highlighted below:

Employed staff:

- BCBA and RBT have the highest data points reported, 17 and 18 surveys respectively
- BCaBA staff wage and FTEs reported by 8 providers
- Only 3 providers reported BCBA-D staff information

Summary of observations by the provider types:

- BCBA-Ds rarely provide services and the majority of services are provided by an BCBA
- BCBAs and RBTs both provide 0362T and 0373T (BCBAs provide services about 65% of the time, RBT the remaining 35%)
- A high use of RBTs for procedure codes 97153 and 97154

ABA Stakeholder Meetings – Key Themes

Reported challenges experienced by providers:

- Providers stated that RBTs are difficult to recruit and retain due to workforce competition; hiring challenges have been increased since the public health emergency. Reasons included:
 - Competing wages from larger agencies and other industries
 - Worker burnout due to job related duties and scheduling
 - Competing with companies offering larger hiring bonuses
- Providers stated that BCBA staff can be a stable workforce, however, they are difficult to recruit and often are home-grown from the provider RBT staff
 - BCBA often leave an agency to start their own
- Providers stated that billing policies differ across payors which can lead to unpaid service time. For example:
 - One MCO allows billing for RBT + BCBA concurrent services; other MCOs do not
 - One MCO has a much lower assessment hours limit

Reported service delivery and staffing approach:

- Providers stated that services are reimbursed the same rate for all place of service (e.g., there is no difference between a clinical and community-based setting)
- Providers stated that 0362T and 0373T are not frequently billed
- Providers stated an average of 10% - 15% supervision time per 15-minute unit
- Providers stated that on average, RBTs have 1 hour of administrative tasks for every 8 hours of service

Overview of Comparison Rate Development Approach

Independent Rate Model Framework



Ground-up approach

- Rates are built from the ground up
- Based on sum of independently determined rate inputs and components
- Inputs are based on expected resources required to provide the service



Commonly applied method for rate determination for community-based services

- Many states employ independent rate model approach
- One acceptable method based on CMS guidance for community-based services

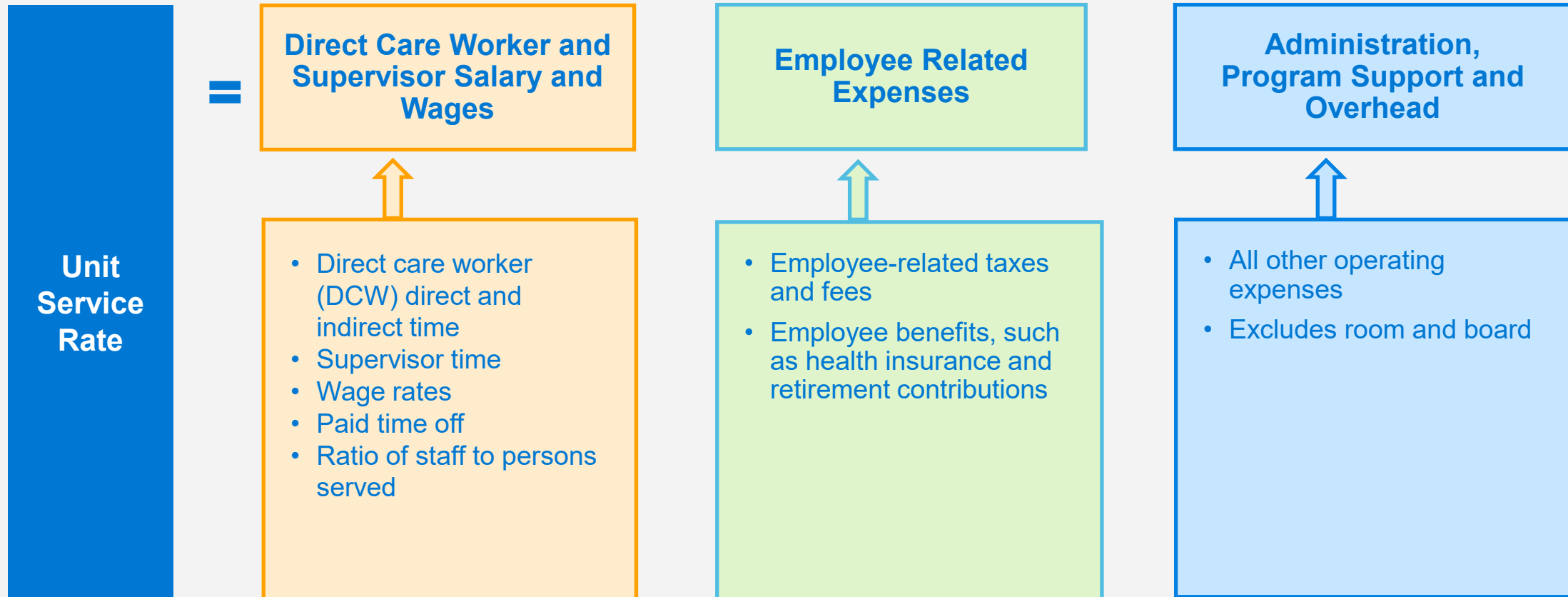


Benefits

- Provides transparency related to the reasonable costs required to provide the service
- Facilitates payment rate updates and modification efforts
- Facilitates comparison of actual costs of providing services
- Developed independently from actual costs incurred – not tied to historical costs

Independent Rate Model Framework

Rate Build Up Components



Potential Independent Rate Model Data Sources



Publicly available information, including but not limited to:

- Wage and employee benefit information from the Bureau of Labor Statistics (BLS)
- Consumer Price Index (CPI)
- State-specific wage and labor force projections



State and stakeholder guidance, reflecting the state and stakeholders' understanding of how the services are provided



Provider survey that will inform independent rate model assumptions (e.g., wages and administrative costs)



State memos and regulations, and program descriptions

Service Assumptions

- Modeled Service Rates Assumptions
- Provider Groupings and Wages
- Employee Related Expense Assumptions
- PTO and Training/Conference Time
- Administration and Program Support

Modeled Service Rate Assumptions

- **Licensed Behavior Analyst (LBA) provider grouping developed in lieu of separate BCBA and BCBA-D services, based on stakeholder feedback, other state practices, and to align with the scope of practice for staff that develop and oversee the services**

- **Concurrent Billing of 97153 and 97155:**

The draft ABA comparison rates incorporated feedback received from ABA service providers and other ABA stakeholders on **allowing concurrent billing** of the following services to provide the care needed to individuals:

- 97153 - Direct Treatment by Protocol
- 97155 - Direct Treatment with Protocol Modification

The fiscal projections include the following assumptions:

- 97153: delivered by an RBT under the supervision of an LBA
- 97155: delivered by an LBA as the sole provider or by a BCaBA under the supervision of an LBA

Draft 97155 modeled rates would need to be updated to include RBT labor costs if current MQD QI payment policy does not adjust to allow for concurrent billing of the 97153 and 97155 service codes

- **Group service rate modeling (i.e., procedure codes 97154, 97157, and 97158) reflects adjustments based on the number of members served**
 - This differs from the current MQD fee schedule approach which for certain services pays 1:1 and 1:2 services at similar rates

Identification of Bureau of Labor Statistics (BLS) Wages for ABA Staff

Used for the Direct Care Worker and Supervisor Salary and Wages Rate Component

Step 1

- Obtain the most recent BLS wage data (May 2022) by occupational code statewide



Step 2

- For each provider grouping, identify similar BLS occupational categories and their related hourly wages



Step 3

- Apply an annual trend factor of 3.12% to the base wages, which resulted in an overall 6.9% increase in wages from May 2022 to July 2024

- BLS does not always publish a specific occupational code that directly corresponds to the ABA staff member providing the service. For certain services, we have grouped together relevant BLS occupation codes and blended the wage data based on a weighting for each selected occupation.
- Each combination of BLS occupation codes is referred to as a “provider grouping.” The BLS occupation codes and weighting within each provider grouping are determined based on review of the requirements and qualifications for each ABA service and the BLS occupation code descriptions, along with consideration of ABA provider survey results.
- The selection of the BLS wage percentiles and annual trend factor was informed by the emerging workforce-specific wage trend, stakeholder feedback (via provider survey and workgroup meetings), and MQD’s intent to maintain a strong behavioral workforce in Medicaid to carry out behavioral health program goals in today’s inflationary and workforce shortage environment.

Provider Survey ABA Staff Wages

Used for the Direct Care Worker and Supervisor Salary and Wages Rate Component

Step 1

- ABA providers were asked via the ABA Rate Study Provider Survey to provide the average hourly wage for employed ABA staff as of September 1, 2023



Step 2

- Provider survey wage data were compiled and analyzed. The median wage was selected for comparison purposes.



Step 3

- Apply an annual trend factor of 3.12% to the median hourly wage reported, which resulted in an overall 2.6% increase in wages from September 2023 to July 2024

2023 ABA Rate Study Provider Survey collected average hourly wage information by the provider type as of September 1, 2023 for employed staff

- Three provider surveys reported wage information for BCBA-D
- Seventeen provider surveys reported wage information for BCBA
- Eight provider surveys reported wage information for BCaBA
- Eighteen provider surveys reported wage information for RBTs

Provider Groupings Wage Assumptions

Provider Grouping ^[1]	BLS Wage-Blend Weight	May 2022 - BLS Wages		Trended Hourly Wages (3.12% Annual Trend Rate)		
		50th Percentile	75th Percentile	Scenario 1 BLS - 50th Percentile	Scenario 2 Survey Median	Scenario 3 BLS - 75th Percentile
Bureau of Labor Statistics (BLS) Occupations						
Registered Behavior Technician® (RBT®)	100%	\$22.36	\$24.64	\$23.91	\$25.14	\$26.34
Social and Human Service Assistants	10%	\$17.90	\$21.39	\$19.13		\$22.87
Psychiatric Technicians	90%	\$22.86	\$25.00	\$24.44		\$26.72
Board Certified Assistant Behavior Analyst® (BCaBA®)	100%	\$27.60	\$38.60	\$29.50	\$41.55	\$41.26
Substance Abuse, Behavioral Disorder, and Mental Health Counselors	100%	\$27.60	\$38.60	\$29.50		\$41.26
Licensed Behavior Analyst (LBA) ^[2] (BCBA®) and (BCBA-D®) Provider Level	100%	\$56.27	\$64.06	\$60.15	\$63.09	\$68.48
Social Workers, All Other	10%	\$40.85	\$47.44	\$43.67		\$50.71
Psychologists, All Other	90%	\$57.98	\$65.91	\$61.98		\$70.46
Notes: [1] "Behavior Analyst Certification Board, Inc.®," "BACB®," "Board Certified Behavior Analyst®," "BCBA®," "BCBA-D®" and "Board Certified Behavior Analyst-Doctoral®," "Board Certified Assistant Behavior Analyst®," "BCaBA®," "Registered Behavior Technician®", and ("RBT®") are owned by the Behavior Analyst Certification Board®. [2] Proposed Licensed Behavior Analyst provider grouping in lieu of separate provider groupings for BCBA and BCBA-D; intends to reflect a mix of assumed BLS occupations representing BCBA and BCBA-D provider types. Wage Data Source: Bureau of Labor Statistics. (April 2023). May 2022 State Occupational Employment and Wage Estimates: Hawai'i. Retrieved from: https://www.bls.gov/oes/current/oes_hi.htm Trend Data Source: Federal Reserve Economic Data. (June 2023). Average Hourly Earnings of All Employees, Education and Health Services. Retrieved from: https://fred.stlouisfed.org/series/CES6500000003						

Employee Related Expenses Assumptions Using Survey Median Wages

Provider Group	Trended Survey Median Wage	Annual Employee Salary	Medicare	Social Security	FUTA	SUI	Workers Comp	Insurance	Retirement	ERE per Employee	ERE Percentage	Annual Salary and ERE
	A	B = A * 2,080	C = B * 1.45%	D = B * 6.2% up to \$160,200 estimated taxable limit	E	F = B * 6.2% up to \$56,700 estimated taxable limit	G = B * 1.4%	H	I = B * 3.7%	J = C through I	K = J / B	L = B * (1 + K)
RBT	\$25.14	\$52,291	\$758	\$3,242	\$420	\$3,242	\$732	\$7,651	\$1,935	\$17,980	34.4%	\$70,271
BCaBA	\$41.55	\$86,424	\$1,253	\$5,358	\$420	\$3,515	\$1,210	\$7,651	\$3,198	\$22,605	26.2%	\$109,029
LBA	\$63.09	\$131,227	\$1,903	\$8,136	\$420	\$3,515	\$1,837	\$7,651	\$4,855	\$28,318	21.6%	\$159,545

ERE percentage is based on Employee Related Expenses divided by the annual employee salary

PTO, Training Time, and Non-Productive Time Adjustment Factor

	A	B	C	D	E	F	G	H	I	J
Provider Group	Total Hours	Paid Holidays and PTO per year	On-going training / conference time hours per year	Total	Training hours / inefficient time for each new hire	Turnover %	New hire training hours per year	Hours of replacement for non-productive time	Annual productive time	PTO / training / conference time adjustment factor
				B + C			E * F	D + G	A - H	A / I - 1
RBT	2,080	160	93	253	40	35%	14	267	1813	14.7%
BCaBA	2,080	160	93	253	40	35%	14	267	1813	14.7%
LBA	2,080	160	93	253	40	35%	14	267	1813	14.7%

- For most services, it is assumed that the indirect time does not result in a billable unit
- In 2021 the American Medical Association (AMA) changed the service descriptions of select assessment services to allow specific indirect activities to produce a billable unit (e.g., 97151 and 99213), even when the time is not “person facing”
- For these services, the rate model reflects all billable time (both person facing and non-person facing) as direct time, and non-billable and non-client-facing time as indirect time
- 97151 Behavior Identification Assessment service rate buildup uses an adjustment factor that accounts for additional non-productive time

Definition of Administration and Program Support Costs

Generally, **administrative-related expenses** include all expenses incurred by the provider entity necessary to support the provision of services but not directly related to providing services to individuals. These expenses exclude transportation, wages and employee-related expenses for clinical care, and may include, but not be limited to:

- ✓ Salaries and wages, and related employee benefits for employees or contractors that are not direct service workers or first- and second- line supervisors of direct service workers
 - ✓ Liability and other insurance
 - ✓ Licenses and taxes
 - ✓ Legal and audit fees
 - ✓ Accounting and payroll services
 - ✓ Billing and collection services
 - ✓ Bank service charges and fees
 - ✓ Information technology
 - ✓ Telephone and other communication expenses
 - ✓ Office and other supplies including postage
 - ✓ Accreditation expenses, dues, memberships, and subscriptions
 - ✓ Meeting and administrative travel related expenses
 - ✓ Training and employee development expenses, including related travel
 - ✓ Human resources, including background checks and other recruiting expenses
 - ✓ Community education
 - ✓ Marketing/advertising
 - ✓ Interest expense and financing fees
 - ✓ Facility and equipment expense and related utilities
 - ✓ Vehicle and other transportation expenses not related to transporting individuals receiving services or transporting employees to provide services to individuals
 - ✓ Board of director-related expenses
 - ✓ Translation services
- Note: Interpreter services for service delivery are paid for separately.*

Program support costs include supplies, materials and equipment necessary to support service delivery.

Administration and Program Support Assumptions

- A single factor of **18%** will be used as an **adjustment to account for the cost of administration, program support, and overhead** of the provider in modeled rates
- Administration and program support components for ABA services assume program vehicle expenses in addition to administrative staff salaries and wages
- Other program costs are also considered in the assumed 18% adjustment factor, including, but not limited to liability insurance, assessment fees, and software fees
- **18%** factor consistent with ABA provider survey results

Draft Rate Calculations

Draft Rate Modeling

We have modeled draft rates under the following scenarios ranging from low to high (all other rate factors are the same across scenarios):

- Scenario 1: Based on BLS 50th percentile wages
- Scenario 2: Based on ABA provider survey median wages
- Scenario 3: Based on BLS 75th percentile wages

Estimated aggregate payment impacts for ABA services combined, in comparison to CY 2022 base payments of \$14.6M, are as follows:

- Scenario 1: Estimated **\$3.9M** increase (+27%)
- Scenario 2: Estimated **\$5.2M** increase (+36%)
- Scenario 3: Estimated **\$6.3M** increase (+43%)

Estimated payment impacts include a projected increase in 97153 units under an assumed change in billing policies to allow for concurrent services for procedure codes 97153/97155 and 97153/97156 across all MCOs

See Appendix C for rate benchmarking comparison across payers

97153:HM - Rate Buildup “Scenario 2” Example Using Survey Median Wage

Service Information					
Service Code:	97153-HM				
Service Category:	Adaptive Behavior Treatment				
Service Description:	Direct treatment by protocol	<i>Note: includes allocation of LBA supervisor time</i>			
Reporting Units:	15 minutes				
Ref.	Description	Registered Behavior Technician (RBT)	Supervisor: Licensed Behavior Analyst (LBA)	Total	Notes
A	Average minutes of direct time per unit	15			
B	Average minutes of indirect time per unit	2.00			
C	Total minutes per unit	17.00			$C = A + B$
D	Staffing Ratio	1.00			
E	Supervisor span of control		6.00		6 employees assumed to be managed by 1 supervisor
F	Supervisor time per unit		2.83		$F = C / D / E$
G	PTO/training/conference time adjustment factor	14.7%	14.7%		Based on separate PTO build
H	Adjusted total minutes per unit	19.50	3.25		$H = C / D * (1 + G) \parallel H = F * (1 + G)$
I	Hourly wage	\$ 25.14	\$ 63.09		Based on separate wage build
J	Total wages expense per unit	\$ 8.17	\$ 3.42	\$ 11.59	$J = I * H / 60$
K	Employee related expense (ERE) percentage	34.4%	21.6%		Based on separate ERE build
L	Total ERE expense per unit	\$ 2.81	\$ 0.74	\$ 3.55	$L = J * K$
M	Administration / program support / overhead			18.0%	Portion of total rate
N	Administration Expenses			\$ 3.32	$N = M * (J + L) / (1 - M)$
O	Rate Per 15 minutes			\$18.46	$O = J + L + N$

Current MQD Fee Schedule Rate: \$12.50

97155:HO - Rate Buildup “Scenario 2” Example Using Survey Median Wage

Service Information				
Service Code:	97155-HO			
Service Category:	Adaptive Behavior Treatment			
Service Description:	Direct treatment with protocol modification	Note: assumes 97153 HM (RBT) services provided concurrently can be billed separately; as such, does not include RBT costs		
Reporting Units:	15 minutes			
Ref.	Description	Licensed Behavior Analyst (LBA)	Total	Notes
A	Average minutes of direct time per unit	15		
B	Average minutes of indirect time per unit	6.00		
C	Total minutes per unit	21.00		$C = A + B$
D	Staffing Ratio	1.00		
E	Supervisor span of control			
F	Supervisor time per unit			$F = C / D / E$
G	PTO/training/conference time adjustment factor	14.7%		Based on separate PTO build
H	Adjusted total minutes per unit	24.09		$H = C / D * (1 + G) \parallel H = F * (1 + G)$
I	Hourly wage	\$ 63.09		Based on separate wage build
J	Total wages expense per unit	\$ 25.33	\$ 25.33	$J = I * H / 60$
K	Employee related expense (ERE) percentage	21.6%		Based on separate ERE build
L	Total ERE expense per unit	\$ 5.47	\$ 5.47	$L = J * K$
M	Administration / program support / overhead		18.0%	Portion of total rate
N	Administration Expenses		\$ 6.76	$N = M * (J + L) / (1 - M)$
O	Rate Per 15 minutes		\$37.56	$O = J + L + N$

Current MQD Fee Schedule Rate: \$31.25

97156:HN - Rate Buildup “Scenario 2” Example Using Survey Median Wage

Service Information					
Service Code:	97156-HN				
Service Category:	Adaptive Behavior Treatment				
Service Description:	Family training	<i>Note: includes allocation of LBA supervisor time</i>			
Reporting Units:	15 minutes				
Ref.	Description	Board Certified Assistant Behavior Analyst (BCaBA)	Supervisor: Licensed Behavior Analyst (LBA)	Total	Notes
A	Average minutes of direct time per unit	15			
B	Average minutes of indirect time per unit	6.00			
C	Total minutes per unit	21.00			$C = A + B$
D	Staffing Ratio	1.00			
E	Supervisor span of control		6.00		6 employees assumed to be managed by 1 supervisor
F	Supervisor time per unit		3.50		$F = C / D / E$
G	PTO/training/conference time adjustment factor	14.7%	14.7%		Based on separate PTO build
H	Adjusted total minutes per unit	24.09	4.02		$H = C / D * (1 + G) \parallel H = F * (1 + G)$
I	Hourly wage	\$ 41.55	\$ 63.09		Based on separate wage build
J	Total wages expense per unit	\$ 16.68	\$ 4.22	\$ 20.91	$J = I * H / 60$
K	Employee related expense (ERE) percentage	26.2%	21.6%		Based on separate ERE build
L	Total ERE expense per unit	\$ 4.36	\$ 0.91	\$ 5.28	$L = J * K$
M	Administration / program support / overhead			18.0%	Portion of total rate
N	Administration Expenses			\$ 5.75	$N = M * (J + L) / (1 - M)$
O	Rate Per 15 minutes			\$31.93	$O = J + L + N$

Current MQD Fee Schedule Rate: \$25.00

0362T:HO - Rate Buildup “Scenario 2” Example Using Survey Median Wage

Service Information

Service Code: 0362T-HO

Service Category: Adaptive Behavior Assessment

Service Description: Behavior identification supporting assesment

Reporting Units: 15 minutes

Note: assumes 3.0 FTEs providing service

Ref.	Description	Registered Behavior Technician (RBT)	Registered Behavior Technician (RBT)	Supervisor: Licensed Behavior Analyst (LBA)	Total	Notes
A	Average minutes of direct time per unit	15	15	15		
B	Average minutes of indirect time per unit	2.00	2.00	2.00		
C	Total minutes per unit	17.00	17.00	17.00		C = A + B
D	Staffing Ratio	1.00	1.00	1.00		
E	Supervisor span of control					
F	Supervisor time per unit					F = C / D / E
G	PTO/training/conference time adjustment factor	14.7%	14.7%	14.7%		Based on separate PTO build
H	Adjusted total minutes per unit	19.50	19.50	19.50		H = C / D * (1 + G) H = F * (1 + G)
I	Hourly wage	\$ 25.14	\$ 25.14	\$ 63.09		Based on separate wage build
J	Total wages expense per unit	\$ 8.17	\$ 8.17	\$ 20.51	\$ 36.85	J = I * H / 60
K	Employee related expense (ERE) percentage	34.4%	34.4%	21.6%		Based on separate ERE build
L	Total ERE expense per unit	\$ 2.81	\$ 2.81	\$ 4.43	\$ 10.05	L = J * K
M	Administration / program support / overhead				18.0%	Portion of total rate
N	Administration Expenses				\$ 10.29	N = M * (J + L) / (1 - M)
O	Rate Per 15 minutes				\$57.19	O = J + L + N

Current MQD Fee Schedule Rate: \$31.25

Project Next Steps

Project Materials and Next Steps



Materials for ABA Rate Study will be posted on the MQD project website:

<https://medquest.hawaii.gov/en/plans-providers/fee-for-service/fee-schedules.html>

Next Steps:

- Providers to send any additional feedback about the ABA comparison rate assumptions discussed today
- Milliman and MQD will review feedback discussed today and submitted via email for consideration; we request written feedback by **Monday, December 11, 2023**
- MQD to submit the ABA rate study and budget estimates to the State legislature for their consideration

ABA Rate Study email address for questions and feedback: HI.ABA.RateStudy@milliman.com

Limitations

The information contained in this presentation has been prepared for the State of Hawai'i Med-QUEST (MQD) in preparation of a December 4th, 2023, Applied Behavior Analysis (ABA) provider stakeholder meeting with MQD and is not appropriate for other purposes.

This presentation has been shared with Hawai'i ABA Medicaid stakeholders. This presentation may not be provided to other third parties without Milliman's prior written consent. To the extent that the information contained in this presentation is provided to any approved third parties, the correspondence should be distributed in its entirety. Any user of this information must possess a certain level of expertise in health care modeling that will allow appropriate use of the information presented.

In preparing this analysis, we relied on information provided by MQD, ABA providers, the managed care plans of Hawai'i, the Bureau of Labor and Statistics, and the Federal Reserve Bank of St. Louis. We accepted this information without audit, but reviewed the information for general reasonableness. Our results and conclusions may not be appropriate if this information is not accurate.

Milliman has developed certain models to estimate the values included in this analysis. The intent of the models is to calculate ABA services provider rate scenarios. We have reviewed the models, including their inputs, calculations, and outputs for consistency, reasonableness, and appropriateness to the intended purpose.

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Thank you

Appendix A: Service Definition

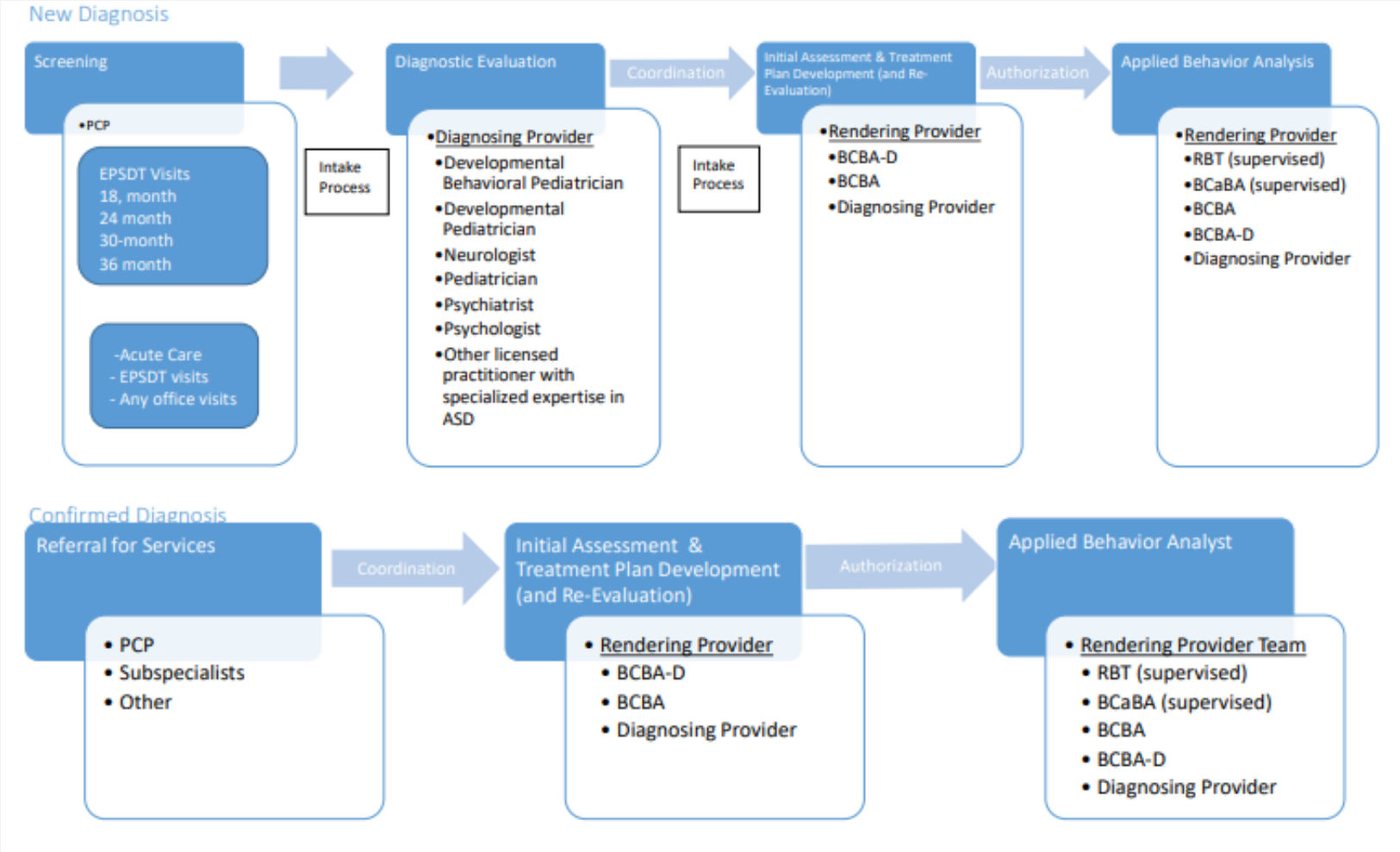
CMS Requirements for ABA Services



*Centers for Medicare & Medicaid Services (CMS) guidance clarifying Medicaid coverage of services for children with ASD pursuant to section 1905(a) of the Social Security Act **for the Early and Periodic Screening, Diagnostic and Treatment (EPSDT) benefit is unchanged. Under section 1905(r) of the Social Security Act, state Medicaid programs must cover medically necessary services for members under 21 years of age, including those diagnosed with ASD. Therefore, Hawai'i's QUEST-Integration (QI) health plans must continue to comply with the full range of EPSDT duties and requirements. These duties include providing medically necessary Intensive Behavioral Therapy (IBT) treatment modalities, which include ABA, for children under 21 years of age. QI health plans shall coordinate and promote continuity of care and ensure that members receive all medically necessary services.***

Source: QI-2301 FFS 23-01: Coverage of Intensive Behavioral Therapy (IBT) For Treatment of Children Under 21 Years of Age With Autism Spectrum Disorder (ASD). *Department of Human Services*. January 13, 2023. Retrieved from: [https://medquest.hawaii.gov/content/dam/formsanddocuments/provider-memos/qi-memos/qi-memos-2023/QI-2301_FFS%2023-01%20&%20Attachments%20A-B-C%20\(part%201\)%20-%20signed.pdf](https://medquest.hawaii.gov/content/dam/formsanddocuments/provider-memos/qi-memos/qi-memos-2023/QI-2301_FFS%2023-01%20&%20Attachments%20A-B-C%20(part%201)%20-%20signed.pdf)

Accessing ABA Services Overview



Source: QI-2301 FFS 23-01: Coverage of Intensive Behavioral Therapy (IBT) For Treatment of Children Under 21 Years of Age With Autism Spectrum Disorder (ASD). *Department of Human Services*. January 13, 2023. Retrieved from: [https://medquest.hawaii.gov/content/dam/formsanddocuments/provider-memos/qi-memos/qi-memos-2023/QI-2301_FFS%2023-01%20&%20Attachments%20A-B-C%20\(part%201\)%20-%20signed.pdf](https://medquest.hawaii.gov/content/dam/formsanddocuments/provider-memos/qi-memos/qi-memos-2023/QI-2301_FFS%2023-01%20&%20Attachments%20A-B-C%20(part%201)%20-%20signed.pdf)

Appendix B: BLS Occupational Code Descriptions

BLS Occupational Code Descriptions

BLS Occupational Code	Description	Hawaii Median Wage (May 2022 BLS)
21-1094: Community Health Workers	Promote health within a community by assisting individuals to adopt healthy behaviors. Serve as an advocate for the health needs of individuals by assisting community residents in effectively communicating with healthcare providers or social service agencies. Act as liaison or advocate and implement programs that promote, maintain, and improve individual and overall community health. May deliver health-related preventive services such as blood pressure, glaucoma, and hearing screenings. May collect data to help identify community health needs. Excludes "Health Education Specialists" (21-1091).	\$14.59
21-1093: Social and Human Service Assistants	Promote health within a community by assisting individuals to adopt healthy behaviors. Serve as an advocate for the health needs of individuals by assisting community residents in effectively communicating with healthcare providers or social service agencies. Act as liaison or advocate and implement programs that promote, maintain, and improve individual and overall community health. May deliver health-related preventive services such as blood pressure, glaucoma, and hearing screenings. May collect data to help identify community health needs. Excludes "Health Education Specialists" (21-1091).	\$17.90

Source: U.S. Bureau of Labor Statistics. Standard Occupational Classification 2018. Retrieved from: <https://www.bls.gov/soc/2018/home.htm>

U.S. Bureau of Labor Statistics. Standard Occupational Classification 2021. Retrieved from: https://www.bls.gov/oes/oes_doc.htm

U.S. Bureau of Labor Statistics. May 2022 National Occupational Employment and Wage Estimates. Retrieved from: https://www.bls.gov/oes/current/oes_nat.htm

BLS Occupational Code Descriptions

BLS Occupational Code	Description	Hawaii Median Wage (May 2022 BLS)
29-2053: Psychiatric Technicians	Psychiatric technicians and aides care for people who have mental or emotional conditions or developmental disabilities. Technicians typically monitor patients' conditions and provide therapeutic care, such as overseeing their medications. Aides help patients in their daily activities and ensure a safe and clean environment.	\$22.86
21-1018: Substance Abuse, Behavioral Disorder, and Mental Health Counselors	This occupation includes the 2018 SOC occupations 21-1011 Substance Abuse and Behavioral Disorder Counselors and 21-1014 Mental Health Counselors.	\$27.60

Source: U.S. Bureau of Labor Statistics. Standard Occupational Classification 2018. Retrieved from: <https://www.bls.gov/soc/2018/home.htm>

U.S. Bureau of Labor Statistics. Standard Occupational Classification 2021. Retrieved from: https://www.bls.gov/oes/oes_doc.htm

U.S. Bureau of Labor Statistics. May 2022 National Occupational Employment and Wage Estimates. Retrieved from: https://www.bls.gov/oes/current/oes_nat.htm

BLS Occupational Code Descriptions

BLS Occupational Code	Description	Hawaii Median Wage (May 2022 BLS)
21-1029: Social Workers, All Other	All social workers not listed separately.	\$40.85
19-3039: Psychologists, All Other	All psychologists not listed separately.	\$57.98

Source: U.S. Bureau of Labor Statistics. Standard Occupational Classification 2018. Retrieved from: <https://www.bls.gov/soc/2018/home.htm>

U.S. Bureau of Labor Statistics. Standard Occupational Classification 2021. Retrieved from: https://www.bls.gov/oes/oes_doc.htm

U.S. Bureau of Labor Statistics. May 2022 National Occupational Employment and Wage Estimates. Retrieved from: https://www.bls.gov/oes/current/oes_nat.htm

Appendix C: Rate Benchmarks

Registered Behavior Technician® (RBT®) Comparison Rates

Service Code and Description	Washington	New Mexico	Pennsylvania	Maryland	Hawaii	TRICARE Hawaii
97152-Behavior identification supporting assessment	N/A	N/A	\$12.73	\$15.60	N/A	N/A
97153-Adaptive behavior treatment	\$11.00	\$12.50	\$12.73	\$15.60	\$12.50	\$18.78
Notes: 97153 WA: A single rate for the service code, no provider type modifier indicated						

Sources:

Applied Behavior Analysis Maximum Allowed Amounts. Health.mil. The official website of the Military Health System and Defense Health Agency. May 1, 2023. Retrieved from: <https://www.health.mil/Military-Health-Topics/Access-Cost-Quality-and-Safety/TRICARE-Health-Plan/Rates-and-Reimbursement/ABA-Max-Allowed-Amounts>

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Office of Mental Health and Substance Abuse Services Bulletin. Pennsylvania Department of Human Services. January 31, 2020. Retrieved from: [Final Signed - IBHS Bulletin MA Fee Schedule 1.31.20.pdf \(pa.gov\)](#)

Board Certified Assistant Behavior Analyst® (BCaBA®)

Service Code and Description	Washington	New Mexico	Pennsylvania	Maryland	Hawaii	TRICARE Hawaii
97152-Behavior identification supporting assessment	N/A	N/A	\$15.76	\$15.60	\$18.75	N/A
97153-Adaptive behavior treatment	\$11.00	\$12.50	\$15.76	\$17.02	\$12.50	\$20.98
97155-Adaptive behavior treatment with protocol modification	\$12.50	N/A	N/A	N/A	\$18.75	\$27.26
97156-Family training	\$16.25	N/A	N/A	\$9.93*	N/A	\$35.25
Notes: 97155 WA: A single rate for the service code, no provider type modifier indicated 97153 HI: BCaBA and RBT authorized to provide the service under the supervision of an LBA 97156 MD: Rate for when child is present is \$17.02						

Sources:

Applied Behavior Analysis Maximum Allowed Amounts. Health.mil. The official website of the Military Health System and Defense Health Agency. May 1, 2023. Retrieved from: <https://www.health.mil/Military-Health-Topics/Access-Cost-Quality-and-Safety/TRICARE-Health-Plan/Rates-and-Reimbursement/ABA-Max-Allowed-Amounts>

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Office of Mental Health and Substance Abuse Services Bulletin. Pennsylvania Department of Human Services. January 31, 2020. Retrieved from: [Final Signed - IBHS Bulletin MA Fee Schedule 1.31.20.pdf \(pa.gov\)](#)

Board Certified Behavior Analyst® (BCBA®)

Service Code and Description	Washington	New Mexico	New York	Pennsylvania	Maryland	Hawaii	TRICARE Hawaii
97151-Behavior identification assessment	\$16.67	\$70.75	\$19.26	\$22.09	\$31.20	\$31.25	\$38.00
97152-Behavior identification supporting assessment	N/A	\$36.75	\$19.26	N/A	N/A	\$31.25	N/A
97153-Adaptive behavior treatment	\$11.00	\$14.00	N/A	N/A	\$19.86	\$31.25	\$31.25
97155-Adaptive behavior treatment with protocol modification	\$12.50	\$25.00	\$19.26	\$22.09	\$31.20	\$31.25	\$32.71
97156-Family training	\$16.25	\$16.25	\$19.26	\$22.09	\$17.02	\$41.67	\$35.25
0362T-Behavior identification supporting assessment	\$50.00	\$50.00	N/A	N/A	\$42.55	\$31.25	N/A
Notes: 97155 WA: A single rate for the service code, no provider type modifier indicated 97156 MD: Rate for when child is present is \$31.20 0362T WA: Requires LBAT on-site and 2 or more CBTs 0362T MD: Rate is for 2 or more BCaBAs/RBTs with Psychologists/BCBA-D/BCBA on-site							

Sources:

Applied Behavior Analysis Maximum Allowed Amounts. Health.mil. The official website of the Military Health System and Defense Health Agency. May 1, 2023. Retrieved from: <https://www.health.mil/Military-Health-Topics/Access-Cost-Quality-and-Safety/TRICARE-Health-Plan/Rates-and-Reimbursement/ABA-Max-Allowed-Amounts>

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Board Certified Behavior Analyst – Doctoral® (BCBA-D®)

Service Code and Description	Washington	New Mexico	New York	Pennsylvania	Maryland	Hawaii	TRICARE Hawaii
97151-Behavior identification assessment	\$16.67	\$82.50	\$19.26	\$22.09	\$31.20	\$31.25	\$38.00
97152-Behavior identification supporting assessment	N/A	\$41.25	\$19.26	N/A	N/A	\$31.25	N/A
97153-Adaptive behavior treatment	\$11.00	\$15.00	\$19.26	N/A	\$19.86	\$31.25	\$31.25
97155-Adaptive behavior treatment with protocol modification	\$12.50	\$35.00	\$19.26	\$22.09	\$31.20	\$31.25	\$34.26
97156-Family training	N/A	\$22.50	\$19.26	\$22.09	\$17.02	\$41.67	\$35.25
0362T-Behavior identification supporting assessment	\$50.00	\$50.00	N/A	N/A	\$42.55	\$31.25	N/A
Notes: 97155 WA: A single rate for the service code, no provider type modifier indicated 97156 MD: Rate for when child is present is \$31.20 0362T WA: Requires LBAT on-site and 2 or more CBTs 0362T MD: Rate is for 2 or more BCaBAs/RBTs with Psychologists/BCBA-D/BCBA on-site							

Sources:

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Group Services – UN, UP, UQ, UR, US

State	97154-Group treatment by protocol					97157-Multiple-family training					97158-Group treatment with protocol modification				
	UN	UP	UQ	UR	US	UN	UP	UQ	UR	US	UN	UP	UQ	UR	US
HI	\$12.50	\$10.42	\$9.38	\$8.75	\$6.25	\$31.75	\$29.58	\$27.92	\$26.25	\$24.58	\$31.75	\$29.58	\$27.92	\$26.25	\$24.58
WA	\$11.00	\$10.12	\$9.31	\$8.57	\$7.88	\$9.17	\$8.44	\$7.76	\$7.14	\$6.57	\$11.00	\$10.12	\$9.31	\$8.57	\$7.88
NM*	\$8.00	\$8.00	\$8.00	N/A	N/A	\$32.50	\$32.50	\$32.50	\$32.50	\$32.50	\$8.00	\$8.00	\$8.00		
PA	\$16.63	\$16.63	\$8.15	\$8.15	\$8.15	N/A	N/A	N/A	N/A	N/A	\$16.63	\$16.63	\$8.15	\$8.15	\$8.15
MD RBT	\$5.67	\$5.67	\$5.67	\$5.67	\$5.67	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MD BCaBA	\$6.81	\$6.81	\$6.81	\$6.81	\$6.81	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MD BCBA/BCBA-D	\$8.51	\$8.51	\$8.51	\$8.51	\$8.51	\$10.50	\$10.50	\$10.50	\$10.50	\$10.50	\$8.51	\$8.51	\$8.51	\$8.51	\$8.51
TRICARE Hawaii*	N/A	N/A	N/A	N/A	N/A	N/A	\$6.87	N/A	N/A	N/A	N/A	\$6.87	N/A	N/A	N/A
Notes: 97154 & 97157 US PA: rate for group size of 7-12 is \$5.13 97154 MD RBT: group size limited to 2-8 NM: rates vary by provider type, max group size of 4, rates are for BCBA TRICARE Hawaii: 97157 & 97158 (divided by 3)															

Sources:

Applied Behavior Analysis Maximum Allowed Amounts. Health.mil. The official website of the Military Health System and Defense Health Agency. May 1, 2023. Retrieved from: <https://www.health.mil/Military-Health-Topics/Access-Cost-Quality-and-Safety/TRICARE-Health-Plan/Rates-and-Reimbursement/ABA-Max-Allowed-Amounts>

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