

DEPARTMENT OF HEALTH CARE SERVICES PROPOSED CHANGES

Utilization Management for Applied Behavior Analysis (ABA)/Behavioral Health Treatment (BHT) and Transportation Services FACT SHEET

Issue Title: Utilization Management for Applied Behavior Analysis (ABA)/Behavioral Health Treatment (BHT) and Transportation Services. The Department of Health Care Services (DHCS) proposes to strengthen utilization management (UM) controls for ABA/BHT and transportation services in the Medi-Cal program.

Background: ABA/ BHT services and Non-emergent Medical Transport (NEMT) and Non-Medical Transport (NMT), are covered services under the Medi-Cal program. Managed care plans (MCPs) are responsible for covering these services consistent with state and federal requirements, including that services are sufficient in amount, duration, and scope to achieve their intended purpose.

Over time, utilization of these services has increased significantly, with some patterns consistent with overuse and misuse. Some of DHCS' current UM policies around these benefits are less stringent than peer states and/or clinical guidelines regarding their use.

Justification for the Change This proposal strengthens the ability of DHCS and MCPs to conduct appropriate UM in the Medi-Cal program by adding in additional safeguards around the ABA/BHT and NEMT/NMT benefits, which will improve management of health care costs and prevent inappropriate use of services.

DHCS proposes to strengthen UM policies for ABA/BHT services by enabling MCPs to implement the following:

- **Utilization thresholds:** Establish thresholds that would trigger authorization reviews for services exceeding those defined thresholds (e.g., more than 25 hours per week), along with a defined exception process based on medical necessity. These thresholds are intended to align with clinical guidelines for appropriate

levels of care. Utilization management protocols could also establish various thresholds based on age when supported by the evidence base.

- **Autism Spectrum Disorder (ASD) diagnosis requirement:** Require an ASD diagnosis for members age 5 and older to receive ABA services, with provisional eligibility for children under age 5 and exceptions based on medical necessity.
- **Clinical documentation review requirements:** Enhance the ability to request supporting documentation (such as treatment plans and progress notes) to support medical necessity and authorizations.

DHCS proposes to strengthen UM policies for transportation services by enabling MCPs to implement the following:

- **Mileage thresholds:** Establish a threshold on mileage per trip that would trigger authorization reviews for ride requests exceeding those defined thresholds. For example, for one-way NEMT or NMT trips exceeding certain mileage thresholds, authorization reviews would be triggered. Utilization management protocols could also establish various thresholds based on geographic variation, such as for urban or rural areas where high mileage thresholds are warranted.
- **Ride frequency thresholds:** Establish a threshold on the number of rides per day and/or per week that would trigger authorization reviews for ride requests exceeding those defined thresholds. For example, requests for three or more rides a day would trigger authorization reviews.
- **Service Verification:** Establishing guidelines for appointment verification for NMT for services carved out of the managed care plan contract (i.e., pharmacy or certain SUD treatment services), requiring review of documentation substantiating scheduled services in support of both mileage and frequency thresholds.