

# AUTISM LAW SUMMIT

## TRICARE: Autism Care Demonstration

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October 5, 2018



***“Medically Ready Force...Ready Medical Force”***

# Overview



- Military Health System (MHS) Introduction
- History of Applied Behavior Analysis (ABA) services under TRICARE
- Autism Care Demonstration (ACD) – Information
  - ACD initiatives
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- Category I Current Procedural Terminology (CPT) Codes for Adaptive Behavior Assessment and Treatment
- ACD Points of Contact
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# The Military Health System (MHS)



Mr. Tom McCaffery,  
Acting Assistant Secretary of  
Defense for Health Affairs



The MHS is an integrated, world-wide system of care that ensures the health and readiness of America's service members to go anywhere, at anytime.

It delivers and coordinates care for 9.4 million Americans – which include service member families, as well as military retirees and their families, by operating 55 hospitals and 373 clinics and managing a global health benefit through the TRICARE program.



# The Defense Health Agency

## Priorities & Goals



Vice Admiral Raquel C. Bono,  
Director



Robert C. Luciano,  
Command Sergeant Major



**Combat Support Agency:** enables the Army, Navy, and Air Force medical services to provide a medically ready force and ready medical force to Combatant Commands in both peacetime and wartime.

**Enterprise Approach:** drives greater integration of clinical and business processes across the Military Health System, to include managing the TRICARE program.

### Priorities and Goals:

- Optimize operations across the MHS
- Co-create optimal outcomes for health, well-being, and readiness
- Deliver solutions to Combatant Commands

# TRICARE

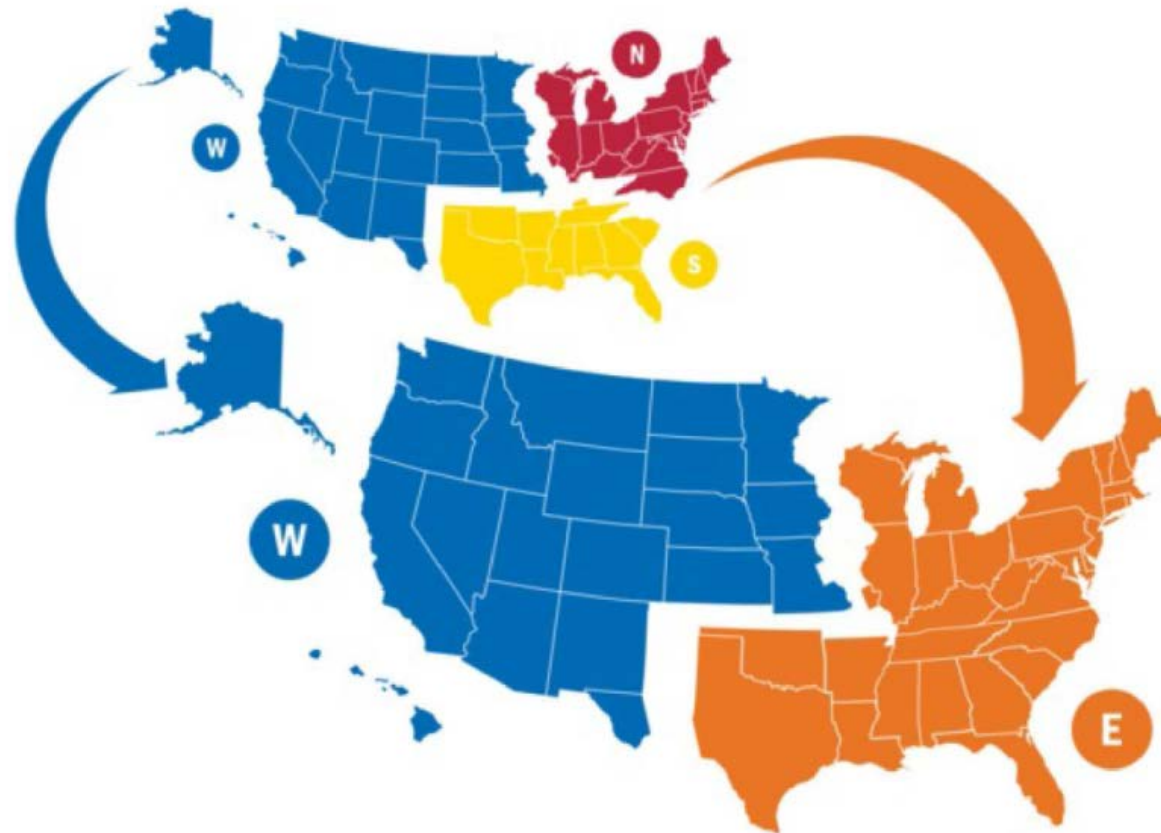
*Fulfilling the promise*



TRICARE remains one of the most comprehensive health benefits available in this country at exceptionally low costs – a benefit that is commensurate with the sacrifice of those who it serves.

***“Medically Ready Force...Ready Medical Force”***

# TRICARE Regions under T-2017



***“Medically Ready Force...Ready Medical Force”***

# Covered Services for Autism Spectrum Disorder (ASD)



- TRICARE covers medically necessary services:
  - Occupational therapy
  - Physical therapy
  - Speech and language therapy
  - Primary Care Services
  - Psychological services and testing
  - Prescription drugs
  - Respite Care (under Extended Care Health Option (ECHO) for Active Duty Family members (ADFM))
  - ABA services under the ACD

# History of ABA Services under TRICARE



- 2001 – ABA services 1<sup>st</sup> provided by DoD under the Program for Persons with Disabilities
- 2005, Sep – ABA services provided under the ECHO for ADFMs diagnosed with ASD and only by Behavior Analyst Certification Board (BACB) certified providers with a bachelor’s degree or above
- 2008, Mar – ABA services provided under ECHO Enhanced Access to Autism Services Demonstration (ADFM’s diagnosed with ASD). Added tiered model services
- 2012, Aug – ABA services under TRICARE Basic medical benefit were available for all beneficiaries diagnosed with ASD to include retiree family members (non-ADFM’s)



# History of ABA Services under TRICARE



- 2013, Jul – A one-year ABA Pilot for non-ADFM beneficiaries diagnosed with ASD was implemented per the National Defense Authorization Act (NDAA) Fiscal Year (FY) 2013, Section 705
- 2014, Jun 14 - Federal Register Notice Published establishing the ACD for all eligible TRICARE beneficiaries diagnosed with ASD
- 2014, Jul 25 – ACD implemented
- 2014, Oct 1 – ACD effective date (Demonstration authority expires 2018, Dec 31)
- Since implementation – several manual changes have implemented improvements to the ACD

# ACD – Information



- Update of ACD statistics (for Fiscal Year 2017):
  - ACD participants: 14,015
  - ABA providers: Almost 29,000
  - Cost: \$268M/year (estimated to increase to over \$400 M/year by 2023)

# What is the ACD?



- The Autism Care Demonstration (ACD) is:
  - ❑ A demonstration benefit that provides ABA services to TRICARE eligible beneficiaries
  - ❑ Consolidated program incorporating all previous ABA programs
  - ❑ Purchased care benefit administered by the regional Managed Care Support Contractors (MCSC) (Health Net Federal Services and Humana Government Business) and U.S. Family Health Plan contractors

# Review of ACD requirements: Beneficiary eligibility



- ABA services are covered for all TRICARE eligible beneficiaries who are dependents of:
  - ADSMs
  - Retired Service members
  - Certain National Guard and Reserve members
  - North Atlantic Treaty Organization (NATO) dependent beneficiaries
  
- Eligible beneficiaries must be:
  - Diagnosed with ASD by a TRICARE-authorized ASD diagnosing provider (Physician – Primary Care Manager (P-PCM) or specialized ASD diagnosing provider)
  - If an ADFM:
    - Enrolled in Exceptional Family Member Program (EFMP)
    - Registered in ECHO

# Review of ACD requirements: Provider eligibility



- TRICARE-authorized ABA providers include:
  - Authorized ABA supervisors
  - Assistant behavior analysts (working under the supervision of an authorized ABA supervisor)
  - Certified behavior technicians (working under the supervision of an authorized ABA supervisor)
  
- TRICARE-authorized ABA providers must possess:
  - State License/Certificate; Certification; Credential
  - Basic Life Support/Cardiopulmonary Resuscitation equivalent
  - Criminal history review
  - Supervision competency (when applicable)
  - Signed Participation Agreement

# Covered ABA Services



- The following ABA services are covered under the ACD:
  - ABA assessment
  - Treatment plan development
  - 1:1 ABA services
  - Guidance for parents, and other caregivers
- The treatment plan, subject to approval, identifies recommendations for ABA services to include the number of hours of ABA each week
- The treatment plan will identify if tiered services are recommended

# Cost of the ACD to the Beneficiary



- For all ABA services, the beneficiary pays the copayment or cost share for their TRICARE program (Prime or Select)
  - ❑ In most cases, for AD Prime, there is no co-pay
  - ❑ <https://tricare.mil/Costs/MentalHealthCosts>
  
- In addition, beneficiaries are protected by catastrophic cap (for the entire family)
  - ❑ ADFM = \$1000
  - ❑ Non-ADFM = \$3000

# Questions a Family should Ask Their ABA Provider



- What is the format for the ABA assessment and what can I expect? (Take me through the steps of how and what happens after the assessment)
- How do you determine the appropriate number of hours and goals for my child?
- What if I disagree with what is in the treatment plan?
- After the initial assessment, when can you start implementing the treatment plan?
- When do you decide to re-assess?
- When can we start my parent training sessions?
- How often will we meet to discuss the treatment plan?
- What is my role in the first week while services are being established and my child adjusts to new services?
- How will I be expected to implement parent goals/participation/data collection?
- How will the team look like?
- What do I do if I think the BT isn't a good fit for my child , do I have a say in staffing?
- What contact do you have with our PCM and/or specialty provider?
- What if we, as parents, feel like our child is not benefitting or progressing? What options do we have?
- When will you know it's time for my child to terminate ABA services?



# Questions a Family should Consider



- Who do I contact if I have questions/concerns?
- Where are the support groups for siblings or parents?
- What are some other resources that may help my family? (Support groups, books/websites, other therapies)
- How do I involve the whole family or other treating providers?
- With a pending PCS, how do those involved with my child's care help us make that transition (case manager, ABA provider, regional contractor, etc.)?
- Is there any coordination with services provided by the schools?
- Who will help me with enrolling in EFMP and registering ECHO?
- What does the home environment for an in-home ABA program need to look like?
- How will socialization be targeted and what should I need to do to arrange socialization with peers outside of ABA services?
- What type of teaching will be done (i.e., Discrete Trial Teaching, Natural Environment Teaching, Functional Assessment)?
- How will OT, ST, and PT play a role and be integrated into my child's therapy?

# ACD Initiatives



- 13 Provider Information Meetings/Stakeholder Round Tables since 2014
- ACD email-box
- TRICARE Quality Management quality audits
- Parent/Caregiver surveys
- Industry Day regarding best practices for ABA services
- DHA site visits to:
  - FBCH, Autism Resource Center (ARC) program
  - JBLM Center for Autism Resources, Education and Services (CARES), Madigan Army Medical Center
- Congressionally Directed Medical Research Program – study awarded
- DoD Office of the Inspector General (OIG) North and South Audit reports published
- DHA presents at APBA conference “Medical Documentation and Claims” (Apr 2018)
- GovDelivery – new



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The official website of the Military Health System

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### Autism Care Demonstration

TRICARE covers applied behavior analysis (ABA) for all beneficiaries through the [TRICARE Autism Care Demonstration](#).

### Meeting References

Download meeting minutes, transcripts, and questions/answers from the Autism Roundtable and Stakeholder meetings.

Select Download:

Select...

### Changes to Texas License Requirements for ABA Providers

Due to changes in Texas (TX) licensure laws for applied behavior analysis (ABA) providers, TX has now defined the licensure requirements for assistant behavior analysts (requiring a certification from the BACB - the Board Certified Assistant Behavior Analyst certification) which goes into effect on Sept. 1, 2018.

[More Information](#)

### Subscribe for Updates

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### Is your child diagnosed with ASD?

You may be asked to complete the **2017 Survey of Military Parents of Children Diagnosed with Autism Spectrum Disorder (ASD)**. We want to:

- Understand your experiences with military health care benefits for children with ASD or similar conditions.
- Learn more about your awareness and participation in TRICARE or other non-DoD programs for families with special needs.

The results from this survey will provide insight about the challenges faced by parents of children diagnosed with

Click one of these.

- South Audit: *The Defense Health Agency Improperly Paid for Autism-Related Services to Selected Companies in the TRICARE South Region*
  - ❑ Published: 10 MAR 2017 <https://media.defense.gov/2017/Dec/19/2001858335/-1/-1/1/DODIG-2017-064.PDF>
  - ❑ Determined that many payments were improper
- North Audit: *TRICARE North Region Payments for Applied Behavior Analysis Services for the Treatment of Autism Spectrum Disorder*
  - ❑ Published: 16 MAR 2018 <https://media.defense.gov/2018/Mar/22/2001893494/-1/-1/1/DODIG-2018-084.PDF>
  - ❑ Determined that 2/3 (\$80M of \$120M) of payments for ABA services were improper, mostly due to missing or inadequate documentation

# Documentation References



## ■ Requirements for medical record documentation found in:

- 32 CFR 199.2

(<http://manuals.tricare.osd.mil/pages/DisplayManualFile.aspx?Manual=FR16&Change=2&Type=AsOf&Filename=C2.PDF>)

- TPM Chapter 1, Section 5.1 “Requirements for Documentation of Treatment in Medical Records”

([http://manuals.tricare.osd.mil/pages/DisplayManualFile.aspx?Manual=TP15&Change=19&Type=AsOf&Filename=C1S5\\_1.PDF](http://manuals.tricare.osd.mil/pages/DisplayManualFile.aspx?Manual=TP15&Change=19&Type=AsOf&Filename=C1S5_1.PDF))

- TOM Chapter 18, Section 4, paragraph 17.2

(<http://manuals.tricare.osd.mil/pages/DisplayManualFile.aspx?Manual=TO15&Change=23&Type=AsOf&Filename=C18S4.PDF>)

- ## ■ Changing/Deleting/Modifying notes after they have been written is prohibited; however, adding an amendment is permitted

# Documentation

## Progress note: General



### ■ Every progress note must include:

- Name of the beneficiary
- Name/signature of the rendering provider
- The date and time of the session;
- Length of the therapy session;
- Notation of the patient's current clinical status evidenced by the patient's signs and symptoms (i.e., functional status) (except for 0360T/0361T)
- Content of the session;
- Statement summarizing the techniques attempted during the session;
- Description of the response to treatment, the outcome of the treatment, and the response to significant others (except 0360T/0361T); and
- Statement summarizing the patient's degree of progress towards the treatment goals

# AMA 2019 CPT Codes: Adaptive Behavior Assessment and Treatment



- AMA released new CPT codes
- Category I CPT codes for Adaptive Behavior Assessment and Treatment are currently under review by DHA
- Once a decision has been made (i.e., approved by DHA senior leadership), a manual change will be coordinated and published
- Communication of the manual change will follow

# ACD: Points of Contact

*All questions should be directed to the MCSC or DHA*



- The Regional TRICARE® Contractors have ABA trained representatives available to help assist family members/caregivers to access timely ABA services. The Regional Contractor phone numbers are:
- HealthNet Federal Services (West Region): 1-844-866-9378; #1; #5 (ask to speak with their Autism specialists)
- Humana Military (East Region): Main line – 1-800-444-5445; ABA Customer Service – 1-866-323-7155;
- Also see: <http://www.tricare.mil/Plans/SpecialPrograms/ACD> for updates as we transition to our new contractors
- Program/Policy questions should be emailed to: [DHA.ACD@mail.mil](mailto:DHA.ACD@mail.mil)



# Questions