



Date: June 7, 2016

To: Coordinated care organizations
Public School District superintendents
Education Service District superintendents
Early Intervention/Early Childhood Special Education (EI/ECSE) contractors

From: Don Ross, Manager
Medicaid Operations and Policy, Health Systems Division¹

Subject: Coordinating care for Oregon Health Plan members who receive applied behavior analysis services

Starting July 1, 2016, coordinated care organizations (CCOs) will coordinate applied behavior analysis (ABA) services for their members. This means that the CCO will approve ABA services delivered to CCO members in the community or clinic setting. The CCO also will be responsible for payment of these services.

Some CCO members (those who are eligible for services under the federal Individuals with Disabilities Education Act, or IDEA) may also be receiving school-based ABA services, if specified in their Individualized Education Programs (IEP) or Individualized Family Service Plans (IFSP). The IEP and IFSP are developed by public education agencies in accordance with federal and state law.

- It would be very helpful to the CCOs to know if their members are receiving school-based ABA services. Any community-based care these CCO members may receive will not be affected.
- For example, information about school-based ABA services will not apply toward any therapy benefit limits the CCO may have, and will not affect CCO decisions about approving community-based ABA coverage.

Why is this happening?

CCOs coordinate all types of care (medical, dental, behavioral health and specialty care) to help keep their members healthy. The Oregon Health Authority encourages coordination across all care systems to support the ultimate goal of health system transformation: to deliver the right care in the right place at the right time.

What should you do?

Public education agencies are required to protect the personally identifiable information of children with disabilities in accordance with the Family Educational Rights and Privacy Act (FERPA) and IDEA. Therefore, in supporting the coordination of services with CCOs, public education agencies can only release protected information such as IEP and IFSP information to a child's CCO pursuant to these requirements.

¹ The Addictions and Mental Health Division and Division of Medical Assistance Programs are now united as the Health Systems Division.

About applied behavior analysis coverage under the Oregon Health Plan

On January 1, 2015, OHA added ABA services as a covered benefit for Oregon Health Plan members with a diagnosis of autism spectrum disorder or self-injurious behavior due to a neurological dysfunction. This benefit was paid by OHA on a fee-for-service basis for all eligible members. .

For IDEA services leveraging Medicaid under OHA's School Based Health Services (SBHS) program, OHA will submit a State Plan Amendment to the Centers for Medicare and Medicaid Services (CMS). Once approved by CMS, the amendment will allow OHA to reimburse SBHS providers for ABA services provided to OHP-eligible children under an IEP or IFSP as part of cost-sharing under federal financial participation.

Questions?

- **About SBHS:** Contact Linda Williams at 503-945-6730 or email linda.j.williams@state.or.us.
- **About ABA services:** Contact Lea Forsman lea.forsman@state.or.us.
- **About FERPA and IDEA:** Contact the Oregon Department of Education, Student Services at 503-947-5600 or email ode.frontdesk@ode.state.or.us.

Thank you for your continued support of the Oregon Health Plan and the services you provide to our members.

CC: Oregon Department of Education, Student Services