



## DEPARTMENT OF HEALTH

*Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Robert R. Neall, Secretary*

**To:** All ABA Providers, Optum Maryland Behavioral Health ASO

**From:** Robert R. Neall, Secretary  
Maryland Department of Health

**Re:** COVID-19 #12: Temporary Registration of Registered Behavior Technicians and Telehealth Guidance for ABA Providers

**Release Date:** April 6, 2020

**Effective Date:** March 5, 2020

**NOTE: Please ensure appropriate staff members in your organization are informed of the contents of this memorandum.**

### Background

On March 5, 2020, Governor Lawrence J. Hogan, Jr., declared a state of emergency due to disease ("COVID-19") caused by the novel coronavirus. An outbreak of disease due to COVID-19 first occurred in the Hubei Province, China, in late 2019, and has currently been detected in more than 109 countries, including the United States. COVID-19 is a severe respiratory disease, resulting in illness or death, caused by person-to-person spread of the novel coronavirus.

The measures outlined in this document are restricted to use during the emergency declared by Governor Hogan to deal with the threat of COVID-19 and will expire immediately at the end of the declared emergency or revised by additional orders such that the Secretary's authority to issue this guidance no longer exists.

The actions outlined below are taken pursuant to the authority vested in the Secretary of Health by the laws of Maryland, including but not limited to Md. HEALTH-GENERAL Code Ann. Sections 18-102 and 18-103 and Executive Order No. 20-04-01-01.

The actions apply to Applied Behavior Analysis (ABA) covered services delivered to eligible, fee-for-service Medicaid participants.

### Temporary Registration for Behavior Technicians

Due to COVID-19, the testing site that administers the exam for Registered Behavior Technicians (RBTs) is closed until further notice. The testing site is the only site in Maryland that

administers the examination for RBT providers. Individuals will not be able to take the examination and register with the Behavior Analyst Certification Board (BACB) to provide ABA services. During the state of emergency, the Department will enroll individuals as providers for ABA services without those providers meeting national RBT registration requirements. RBTs must still meet all other requirements in COMAR 10.09.28.021. This action will permit RBTs to provide ABA services to eligible participants during the state of emergency.

RBTs who are enrolled in Maryland Medicaid during this time, without the national registration, must take the examination once the testing site reopens and register through the BACB. ABA group providers must maintain documentation for all RBTs who are providing ABA services without the BACB registration.

### **Telehealth Guidance for ABA Providers**

During the state of emergency, the Department is taking the following actions with respect to the use of telehealth for ABA services:

- The Department will not enforce the requirement that only 25 percent of direct supervision (97155) can be provided remotely. During the state of emergency, ABA providers may render 100 percent of supervision services remotely. Services delivered via telehealth using two-way audiovisual technology assisted communication should be billed using the “-GT” modifier.
- The Department will allow certain ABA services to be rendered by telephone. Specifically, during the state of emergency, the Department will allow parent training (97156) to be rendered telephonically and billed using the “-UB” modifier.

Additional information regarding services eligible for delivery via telehealth or telephonically and billing guidance is addressed in the following documents:

- Optum Maryland, ABA PROVIDER ALERT: Telehealth Services in Response to COVID-19 (March 17, 2020), <https://maryland.optum.com/content/dam/ops-maryland/documents/autism/alerts/Telehealth%20ABA%20Provider%20Alert.pdf>.
- COVID-19 Transmittal #1: Temporary Expansion of Medicaid Regulations to Permit Delivery of Telehealth Services to the Home (March 11, 2020): [https://phpa.health.maryland.gov/Documents/COVID-19.1\\_Telehealth%20Guidance\\_Neall.pdf](https://phpa.health.maryland.gov/Documents/COVID-19.1_Telehealth%20Guidance_Neall.pdf).
- COVID-19 Transmittal #4a: Temporary Authorization of Audio-Only Health Care Services to Mitigate Possible Spread of Novel Coronavirus (“COVID-19”) Executive Order No. 20-03-20-01: [https://mmcp.health.maryland.gov/SiteAssets/pages/home/COVID-19%204a\\_Telephonic%20Services%20Guidance\\_3.21.20.pdf](https://mmcp.health.maryland.gov/SiteAssets/pages/home/COVID-19%204a_Telephonic%20Services%20Guidance_3.21.20.pdf).

If you have any questions please email [mdh.aba@maryland.gov](mailto:mdh.aba@maryland.gov).

## Additional Information

- For Medicaid-related information and guidance, visit <https://mmcp.health.maryland.gov/Pages/home.aspx>.
- For Maryland Medicaid's Telehealth Program information, visit <https://mmcp.health.maryland.gov/Pages/telehealth.aspx>.
- For questions about the Coronavirus, visit our website at [coronavirus.maryland.gov](https://coronavirus.maryland.gov).