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**DEPARTMENT OF HUMAN SERVICES**  
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July 21, 2020

MEMORANDUM

MEMO NO.  
QI-2028

TO: QUEST Integration (QI) Health Plans

FROM: Judy Mohr Peterson, Ph.D. *JMP*  
Med-QUEST Division Administrator

SUBJECT: CLARIFICATION ON APPLIED BEHAVIOR ANALYSIS (ABA) SERVICES THROUGH TELEHEALTH

The Med-QUEST Division (MQD) is providing guidance on the approval of ABA services through a telehealth modality. MQD recognizes that telehealth allows for flexibility and increased access to services and therefore health plans may approve additional codes/services to be provided via telehealth if service delivery is clinically appropriate for the individual and quality and effectiveness are maintained.

In Provider Memo QI-2020, MQD approved CPT 97156-Family Adaptive Behavior Treatment Guidance, to be provided via telehealth. In considering other codes to be covered by the health plans, MQD recognizes that telehealth could be used to allow remote supervision by the Board Certified Behavior Analyst (BCBA) when the Registered Behavior Technician (RBT) is face-to-face with the individual receiving an ABA service.

MQD is providing the following areas to consider when approving ABA services through telehealth:

- Individual's ability to accept services through a telehealth modality.
- Individual's ability to participate in the regimen of services for a reasonable period of time (a minimum of 10 minutes can be used as a guide).
- Individual's ability to communicate with the RBT with minimal prompting by the caregiver.
- Individual does not require in-person reinforcement in order to show improvement.

- An assessment of the skills, unique needs of the client, age of the individual, severity of challenging behavior(s), and family/support available in the home needs to be carefully reviewed and considered in approval of services using telehealth as the method of delivery.
- The equipment and internet connectivity must also be adequate to ensure connectivity throughout the session(s) and should be set up in a location where there will be no distractions or disruptions.
- The RBT should have appropriate training and experience in providing the services via telehealth.
- The treatment plan should include the monitoring and assessment of the effectiveness of progress using telehealth.

If the service requires the physical presence of a caregiver to ensure the health and safety of the individual, then ABA services via telehealth is not considered to be an appropriate method to deliver services to the individual.

If the family will be present with the individual during the sessions, the purpose of CPT 97156 is to provide the family/caregiver with training and guidance that is needed to effectively provide ABA services via telehealth.

This guidance should be included as part of a health plan's process for covering ABA services through telehealth. These considerations would not be limited to the public health emergency period. Thank you for your attention to this matter and your continued efforts to ensure quality services are provided to your members. Should you have questions please direct them to either Jon Fujii, Health Care Services Administrator at [jfujii@dhs.hawaii.gov](mailto:jfujii@dhs.hawaii.gov) or Leslie Tawata, Clinical Standards Office Administrator at [ltawata@dhs.hawaii.gov](mailto:ltawata@dhs.hawaii.gov).