Topic: Developmental Disabilities

Subject: Authorization of Behavioral Consultation FBA and BSP

Applies to (check all that apply):

☐ All DHS employees
☐ Area Agencies on Aging
☐ Aging and People with Disabilities
☐ Self Sufficiency Programs
☐ County DD Program Managers
☐ ODDS Children’s Residential Services
☐ Child Welfare Programs
☐ County Mental Health Directors
☐ Health Services
☐ Office of Developmental Disabilities Services (ODDS)
☐ ODDS Children’s Intensive In Home Services
☐ Stabilization and Crisis Unit (SACU)
☐ Other (please specify): Brokerage Directors; Brokerage Personal Agents; CDDP Service Coordinators, DD Behavioral Consultants

Action required:

For individual support plans (ISPs) that begin, renew or are revised on 07/01/2015 or after, the Functional Behavior Assessment, Behavioral Support Plan and Protective Physical Interventions (PPIs) must be authorized utilizing POC procedure code OR570, and include separate Service Prior Authorization (SPA) lines in eXPRS Plan of Care (POC) for each work event. This behavior assessment work is authorized as an ‘event’ in eXPRS/POC. Payment is for the completion of the authorized work event, for the grand sum total of the cost of that authorized work event, not to exceed the total authorized cost.

See the attached example of how authorizing the FBA/BSP and PPI in separate POC service prior authorizations should look.

For Behavior Consultation work authorized under POC procedure code OR570, the amount authorized for each work event must be based upon these guidelines. While services under code OR570 are not authorized or claimed in hourly increments, hourly...
time estimates and rates are used to arrive at the work event total authorized amount and actual billed cost.

- **Functional Behavior Assessment** – a single work event; the amount authorized in the SPA can be set based on a total of a maximum of 15 hours to complete the work. The work event concludes when a deliverable in the form of a completed Functional Behavior Assessment is submitted to the authorizing entity. When billing for the completed work event, the consultant must only bill the total actual cost that is equal to the total hours reflected in the invoice to complete the work. This actual cost billed can be less than, but not more than the amount authorized for the work event and cannot exceed 15 hours.

- **Behavior Support Plan** - a single work event; the amount authorized in the SPA can be set based on a total of a maximum of 12 hours to complete the work. The work event concludes when a deliverable in the form of a completed Behavior Support Plan is submitted to the authorizing entity. When billing for the completed work event, the consultant must only bill the total actual cost that is equal to the total hours reflected in the invoice to complete the work. This actual cost billed can be less than, but not more than the amount authorized for the work event and not to exceed 12 hours.

- **Protective Physical Intervention** (PPI) training can be authorized as an additional work event if appropriate. The amount authorized is the total of up to 3 hours of training. The behavioral consultant must only bill the actual cost incurred based on the total hours of training completed. This actual cost billed can be less than, but not more than the amount authorized for the work event and not to exceed 3 hours.

Payment for the FBA, BSP and PPI is not an hourly authorization. The full, actual cost of each work event as submitted on the final invoice upon the completion of the FBA or BSP is what must be billed in eXPRS/POC. This actual cost billed can be less than, but not more than the amount authorized for the work event.

**Behavior Consultation, Assessment and Training** (OR570) must be billed/invoiced as single event and not as hourly services. If a current POC authorizes the FBA or BSP as an hourly service, that POC must be corrected to reflect a per-event billing.

**On-going consultation:**
On-going consultation will be authorized in eXPRS/POC under POC procedure code OR310 as an hourly service, and invoiced and billed on an hourly basis as authorized per the individuals ISP and the POC and in accordance with the expenditure guidelines and AR-15-008 (the AR replaces the expenditure guidelines where differences occur). eXPRS billings for services authorized under procedure code OR310 will be hourly and require the date of service, the start time (hh:mm) and end time (hh:mm) the service was provided on that date.
Reason for action:
Behavioral Consultants may submit an invoice upon completion of each report and the culmination of each event (FBA, BSP and PPI training if prior authorized). The invoice must reflect total hours of service provided in pursuit of the final deliverable/event. Billing for each of these work events in eXPRS/POC is done as a single event for each report. The invoice should be for the total number of hours worked not to exceed the amount clarified in the Expenditure Guidelines.

Expenditure Guidelines will be updated to reflect this policy and provide clarification for reimbursement of the FBA, BSP, PPI and on-going consultation.

Field/stakeholder review:  ☑ Yes  ☐ No

If yes, reviewed by:  CDDP, Brokerages and Behavioral Consultants

If you have any questions about this action request, contact:

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Examples of current system options for authorizing Behavior Consultation/Assmt/Training under code OR570 in eXPRS/POC.

POC service procedure code OR570 is an outcome-based, event payment service. Payment is made at the completion of the event, when the overall outcome has been met, and for the full & total cost of that outcome based event. The amount billed is for the actual sum total cost of the outcome/event, and can be less than, but not more than, the amount authorized for the service. This code is NOT an hourly service procedure code, and should not be used to authorize services to be billed in hourly increments.

Authorizing all of the Behavioral Consultation/Assmt/Training work as a combination of separate events event under OR570; with each provider SPA being one event for each segment of work (1 event for FBA, 1 event for BSP, & 1 event for PPI training). The 2nd & 3rd SPA can be left in “draft” status until ready for work to begin (previous segment of work has been completed). This will make things easier to edit (dates), if the previous segment of work takes longer than expected & the date ranges need to be edited. Billing would be done when each segment of the authorized work is completed, for the total cost of that segment of work.

The advantage to this is that separate authorized (“rate”) amount limits can be assigned to each of the different segments of work in their own single SPA, based on hourly estimates of how long that segment of work is expected to take. The total of all work event SPAs cannot exceed the service allowed total of $3,200.

How the authorization of OR570 would look in eXPRS/POC:

**Service Delivered Billing** would involve billing for each segment of work authorized as a single event, for the total actual cost to complete all the work included in that work even when that segment of work has been completed. The date of work completion must be within the date range the work was authorized, and list the final actual total cost of that segment of work. That actual total cost can be less
than the amount authorized for the work event, but cannot exceed that authorized amount.