



**Division of Developmental Disabilities Services**  
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**MEMORANDUM**

TO: Applied Behavior Analysis (ABA) Providers  
FROM: Jennifer Brezee, DDS Director  
DATE: February 10, 2025  
SUBJECT: ABA Medicaid Manual Clarifications

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As you all are aware, the new Applied Behavior Analysis (ABA) Service Medicaid Manual became effective January 1, 2025. After listening to ABA provider feedback concerning transitioning to the new Medicaid Manual, the Division of Developmental Disabilities Services (DDS) is implementing the following new guidance until a Medicaid manual update can be promulgated:

- Section 212.400(B): all treatment prescriptions for ABA therapy services can be valid for twelve (12) months unless a shorter time is specified in the treatment prescription. This applies regardless of the age of the beneficiary.
- Section 222.100(A)(2) shall be deemed amended to state, "Developing the initial or updating an existing individualized treatment plan (ITP)." Subpart (a.) of (A)(2) shall be deleted. This is to clarify that updating the ITP should be billed using procedure code 97151 to come into compliance with CPT code definitions. For similar reasons, Section 222.300(A)(4) is deemed deleted in its entirety.
- Section 222.200(D)(1) and (2) are hereby amended to read as follows to allow flexibility in service delivery for both scheduled (i.e. family vacation) and unanticipated (i.e. illness) gaps in a beneficiary's regular service delivery:
  - "1. ABA therapy treatment services performed during a week may exceed the prescribed average weekly number of units only when the beneficiary receives less than the prescribed average weekly number of units during the immediately preceding or immediately following week.
  - 2. ABA therapy treatment services performed during a week cannot exceed the prescribed average weekly number of units by more than twenty five percent (25%) under any circumstance."
- Section 222.300(C)(5): This provision has been interpreted as a cap on 97155 billing as opposed to supervision caseloads, which was not the intent. Therefore, Section 222.300(C)(5) will be deleted in its entirety. The minimum supervision requirements of Section 222.300(C)(2) remains in effect.
- DDS confirms that procedure code 97155, which is used for adaptive behavior treatment with protocol modification services, may be billed concurrently with procedure code 97153, as specifically permitted pursuant to Section 222.300(A).
- DMS-693s will be accepted until April 1, 2025, at which point the DMS-641 ER and DMS-641 TP forms must be used for all ABA therapy evaluation referrals and treatment prescriptions.