

# Experiences and Perspective of a National ABA Provider on the Administration of ABA Services through the Autism Care Demonstration Program

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Presentation to the National Academies' Committee Conducting an Independent  
Analysis of Department of Defense's Comprehensive Autism Care Demonstration Program

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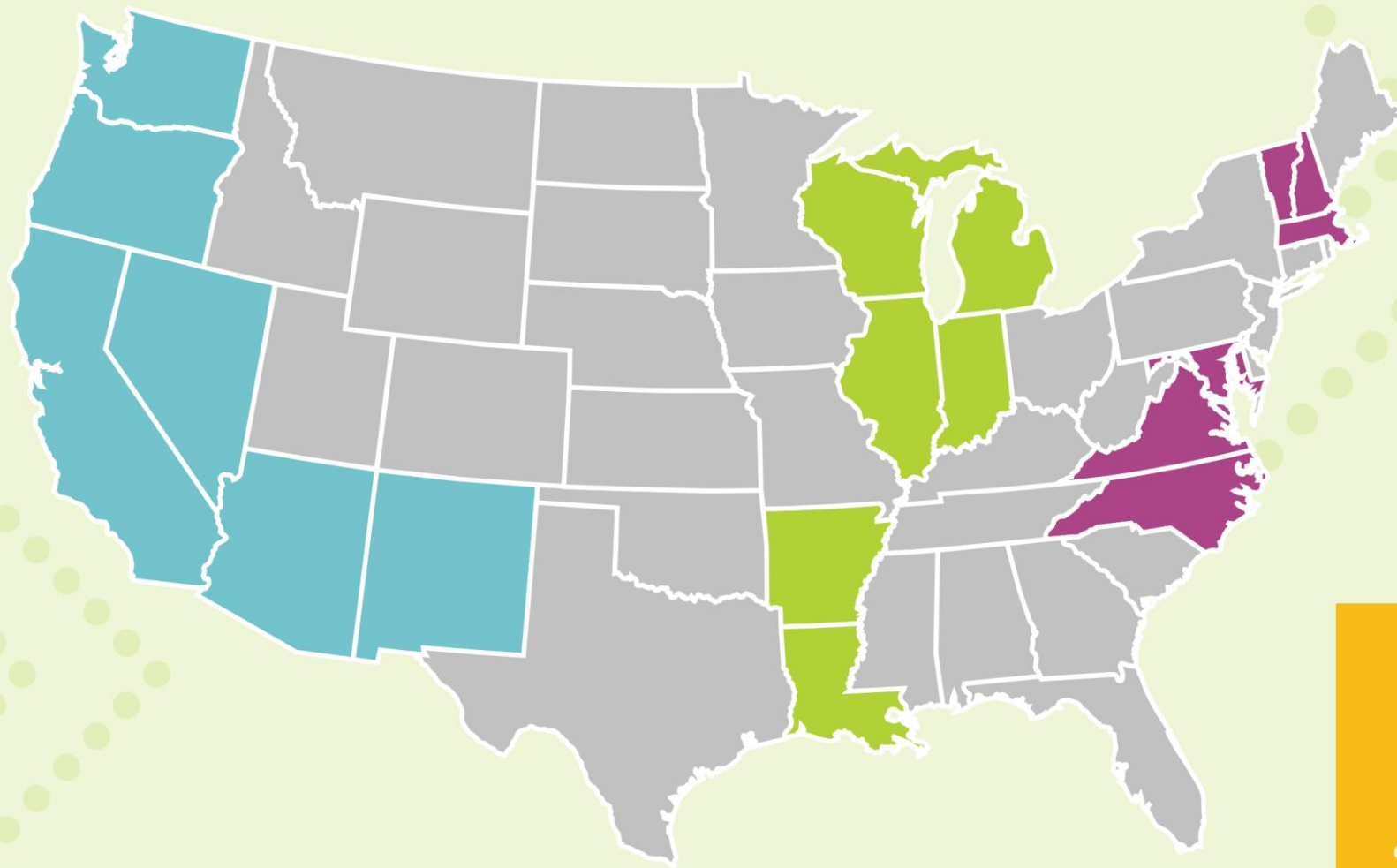
# Disclaimer

The content and opinions expressed in this presentation are for informational purposes only and are intended only for the members and guests of National Academies Committee on Conducting an Independent Analysis of the Department of Defense's Comprehensive Autism Care Demonstration Program. The content and opinions expressed herein are solely my own and derived from my experience in my role at LEARN Behavioral. Further dissemination without the express written consent of LEARN Behavioral is prohibited.





LEARN Behavioral



18

states  
and counting



# LEARN Behavioral

AST

BACA

BCI

Priorities ABA

SPARKS

Tandem  
Therapy

trellis

TOTAL  
SPECTRUM

WEAP

# LEARN Facts

5K

support almost **5,000**  
families a month

100

service nearly **100** new  
families a month

80

operate more than **80**  
Learning Centers  
(our term for autism clinic)

3000

work with more than **300**  
different payors

815

consist of more than **15**  
doctorate-level clinicians,  
nearly **500** BCBAs, and  
almost **300** students  
currently enrolled in a  
master's program

300

train more than **300** new  
behavior technicians a month



## TRICARE States



Virginia



Nevada



North Carolina

**100**

TRICARE  
Beneficiaries  
2024

**163**

TRICARE  
Beneficiaries  
2022



# ABA Service Provider

## CLINICAL SERVICES

- Treatment by Protocol
- Technician Oversight
- Protocol Modification
- Family/Caregiver Training
- Care Coordination
- Report Writing
- Data Analysis
- Administration of Assessment Measures

## CLINICAL OPERATIONS

- Scheduling
- Contracts
- Credentialing
- Compliance
- Training
- Billing
- Utilization Management
- Intake
- Human Resources





# Compliance

## DOCUMENTATION

**Documentation requirements are more onerous compared to other payors**

**Non-payment of services is common**

**Recoupment of services for technical errors are common**

## UTILIZATION MANAGEMENT

**Utilization expectations for 97155 (Protocol Modification) & 97156 (Family Treatment Guidance) exceed common standards**

**Potential consequences for providers and families not meeting utilization expectations are extreme**

## BT CERTIFICATION/RBT

**Technician certification required to begin services (e.g., RBT); no grace period**

**In 2023, only 2.07% behavior technicians joined LEARN with a technician certification**

**On average, it takes LEARN 50 days for a new behavior technician to obtain their RBT**





# Infrastructure

## CREDENTIALING

**Significant differences BCBA credentialing timelines (West vs East)**

**Follow up required in order to get BCBA credentialing applications processed (West vs East)**

**RBT credentialing timeline is not a barrier**

## CLAIMS

**Claims routinely denied because of credentialing and/or documentation problems**

**LEARN had 5.7 times more claims denied with TRICARE East than TRICARE West**

**70% of the claims denied with TRICARE East were because of payor error**

## TECHNOLOGY

**Issues with the TRICARE portal (e.g., providers moving)**

**Appears systems do not communicate (e.g., credentialing and claims)**

**Lack of standardized platforms used with providers for basic functions**



# Clinical Services

## TREATMENT PLANS & OUTCOME MEASURES

Number of outcome measures exceeds what any other provider requires

Treatment plan and outcome measures often not on the same schedule

Treatment plans need to be submitted 6-7 weeks in advance

Limited hours for re-assessment

## RESTRICTIONS ON PROGRAMMING

Restricting Activities of Daily Living (e.g., toilet training)

Setting Restrictions (e.g., community settings)

Restrictions on Telehealth

## BCBA SATISFACTION

Low motivation for BCBAs to accept TRICARE cases

BCBAs limiting the number of TRICARE cases they are willing to supervise

BCBAs often feel like they cannot provide adequate services because of programming restrictions



# Impact on Families

- Lengthy enrollment process
- Reconfirm diagnosis every 2 years
- Consequences of not meeting FTG requirements are punitive
- Transition from TRICARE West to East (vice versa) is not seamless and often ABA services are disrupted
- In certain markets, long wait times for ABA services because of TRICARE's requirements



# Summary

1. TRICARE documentation requirements are excessive compared to other payors.
2. TRICARE denies more claims and requires recoupment for credentialing-related issues compared to other payors.
3. TRICARE utilization expectations are not always feasible and the potential consequences for not meeting those expectations are extreme and punitive for ABA providers and families.
4. Lack of standardization between TRICARE West and TRICARE East has resulted in service disruption for families and created operational barriers.
5. TRICARE places unnecessary service restrictions on providers and their compliance expectations are excessive compared to other payors.





# Thank You!

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