



**Behavioral Health and
Developmental Disabilities Administration**

Communication #20-07

BEHAVIORAL HEALTH COVID-19 GUIDANCE & RESOURCES FOR ABA SERVICES

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For Questions Please Contact:

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Consistent with issued guidance from the Behavioral Health and Developmental Disabilities Administration (BHDDA) related to [Essential Behavioral Health Services and Stay Home Stay Safe Executive Order 2020-21](#), [Clinically Essential F2F Services](#), and [Infection Control](#), this guidance is being issued to further clarify the delivery of essential Applied Behavior Analysis (ABA) services provided through Michigan's public behavioral health system and is directed to Prepaid Inpatient Health Plans (PIHPs), Community Mental Health Service Programs (CMHSPs), their provider ABA agencies and behavior technicians that provide home and community based ABA services and supports to individuals with autism spectrum disorder (ASD).

Behavioral Health Providers must adhere with the Centers for Disease Control and Prevention (CDC) and State recommendations, for social/physical distancing in order to slow the spread of COVID-19 and thus preserve the health system capacity for the duration of this pandemic. In alignment with issued guidance, ABA providers are strongly encouraged to minimize face-to-face contact whenever possible and offer services through alternative means and [telehealth](#) expansion as outlined in MSA [20-09](#) and MSA [20-13](#), in order to protect the health and welfare of both parties. The policy expansion allows flexibility related to the balance of protecting the health and welfare of individuals, their families, and providers while maintaining access to vital ABA services during the COVID-19 pandemic.

BHDDA's issued guidance for determining if services are essential to sustain or protect life reflects that this decision takes place at the individual and family level in order to adapt to each person's unique needs. Essential service definition cannot be applied broadly to all individuals with ASD enrolled in the ABA benefit. This individualized evaluation includes ABA provider's good faith clinical judgment with each service being assessed individually, within the providers scope of practice and ethical guidelines. The clinical rationale for the use of virtual methods vs home-based intervention given the Governor's Stay Home Stay Safe Order and the public

health directives should be based upon the behavioral health needs of the individual and whether or not ABA services are vital to maintain the individual's behavioral stability, health and safety, as well as essential to sustain or protect life. This individualized clinical review of rationale for face to face ABA must be documented and updated regularly as the individual's needs and the public health crisis evolves over time. All providers should use their judgment regarding the risk of exposing COVID-19 to individuals in service, their family members, staff, providers and others, and the relative need for in-person contact with beneficiaries that have complex behavioral health care needs, and risks if such in-person contact was shifted to an electronic telehealth delivery modality.

ABA providers should collaborate with their local CMHSPs and PIHPs to review the clinical recommendations, within a person-centered planning framework, and in accordance with their provider's ABA service contract. PIHPs and CMHSPs are required to review and monitor the authorized services and assure that the ABA providers [conduct virtual screenings](#) to gather information about the person's and all household members' COVID-19 health status prior to any in-person contacts to further and continually assess these risk factors.

It should also be noted that not all in-person face to face services need full close contact, as defined by CDC guidelines and as delineated in BH Clinical Guide to [Face to Face Services 2020-02](#). To the extent possible, in-person ABA services should adhere to social distancing rules, and all people involved should be aware of the importance of wearing a face mask and the importance of invoking other alternatives (e.g., schedule changes) if either provider, beneficiary, or their family develop COVID-19 symptoms. Infection control practices should be done in accordance with CDC guidelines and as articulated in [BH Infection Control](#) Guidelines (2020-03).

The CDC defines close contact* as follows:

- a) being within approximately 6 feet (2 meters) of a COVID-19 case for a prolonged period; close contact can occur while caring for, living with, visiting, or sharing a healthcare waiting area or room with a COVID-19 case
- OR-
- b) having direct contact with infectious secretions of a COVID-19 case (e.g., being coughed on)

***If such contact occurs while not wearing recommended personal protective equipment (PPE) (e.g., face mask or cloth face covering, as appropriate) the contact is considered an exposure.**

For PIHP and CMHSP Autism Coordinator contact information, please visit michigan.gov/autism and for related contract or service questions please contact your [local CMHSP](#).

For the most current information and up to date guidance, please visit Michigan.gov/Coronavirus and the Michigan Department of Health and Human Services, BHDDA [website here](#)

ABA PROVIDER COVID-19 INFORMATION & RESOURCES

American Telemedicine Association: [State Medicaid Best Practices](#)

Association for Behavior Analysis International: COVID-19 [Statement](#) and [Information for Families](#)

Association for Science in Autism Treatment: COVID-19 [Special Issue](#), Guidance for [Providers and Practitioners](#) and [working remotely \(BCBA's\)](#)

Association of Professional Behavior Analysts: COVID-19 [Recorded Webinars](#)

Autism Alliance of Michigan: MiNavigator [Newsletter](#), AAoM [News](#), and [Information](#)

Applied Behavior Analysis Edu.Org: ABA Therapist [Guide to Tele behavioral Health Service](#)

Behavior Analyst Certification Board: COVID-19 [Update from the BACB](#)

Behavioral Health Centers of Excellence: COVID-19 ABA Organizations [FAQ](#), and [Virtual Academy](#)

Centers for Medicare & Medicaid Services: Current Emergencies [Coronavirus](#)

Council of Autism Service Providers (CASP): Telehealth [Resources](#) and [Practice Parameters](#)

Licensing and Regulatory Affairs: [Behavior Analysts-Michigan](#)

Michigan Behavioral Analysis Providers (MiBAP): <http://mibap.org/>

Recent Publications Telehealth and COVID-19:

- A Proposed [Process for Risk Mitigation](#) (Cox, Plavnick, & Brodhead, 2020)
- Model for [Transitioning Direct ABA Services to Telehealth](#) (Rodriquez 2020)

State ABAI Chapter Behavior Analysis Association of Michigan: [Resources](#)

Questions About COVID-19?



Call the COVID-19 Hotline at 888-535-6136,
7 days a week from 8 a.m. to 5 p.m.



Email COVID19@michigan.gov 24/7. Emails
will be answered 7 days a week, 8 a.m. to 5 p.m.



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