Frequently Asked Questions for Qualified Behavioral Health Professionals Policy

Q. What is the reference to the Qualified Behavioral Health Professionals (QBHP) changes in policy and effective date?

The Medical Services Administration (MSA) Bulletin Number 19-21 includes the details of the QBHP change in policy effective January 1, 2020. Below is the Bulletin for your reference.

MSA Bulletin Number 19-21
Issued: August 30, 2019
Effective: January 1, 2020

Behavioral health treatment (BHT) services are highly specialized services that require specific qualified providers who are available within Prepaid Inpatient Health Plan (PIHP)/Community Mental Health Services Program (CMHSP) provider networks and have extensive experience providing specialty mental health and behavioral health services. BHT services must be provided under the direction of a Board Certified Behavior Analyst (BCBA), a qualified Licensed Psychologist (LP) or Limited License Psychologist (LLP), or a master’s prepared Qualified Behavioral Health Professional (QBHP).

The Michigan Department of Health and Human Services (MDHHS) Behavioral Health and Developmental Disabilities Administration (BHDDA) recently completed a statewide applied behavior analysis provider capacity survey of the PIHP/CMHSP system and is forecasting a provider network shortage that will negatively affect access, quality, and compliance of autism spectrum disorder benefit services. Current policy indicates BHT supervisors, including LPs, LLPs, and QBHPs, must be certified as a BCBA by September 30, 2020. This policy deadline is being extended to September 30, 2025 to ensure there is adequate access to a network of providers of BHT services. In addition, the QBHP must be certified as a BCBA within two years of successfully completing their applied behavior analysis (ABA) graduate coursework.

Q. What is the course content requirement to be a BCBA?

The course content requirement to be a BCBA includes the applicant completing 270 classroom hours of graduate-level instruction in the following content areas and for the number of areas specified:

| Ethical and Professional Conduct                     | 45 hours |
| Concepts and Principles of Behavior Analysis         | 45 hours |
| Measurement (including data analysis)                | 25 hours |
| Experimental Design                                  | 20 hours |
| Identification of the Problem & Assessment           | 30 hours |
| Fundamental Elements of Behavior Change & Specific Behavior Change Procedures | 45 hours |
| Intervention & Behavior Change Considerations        | 10 hours |
| Behavior Change Systems                              | 10 hours |
| Implementation, Management and Supervision           | 10 hours |
| Discretionary                                        | 30 hours |
| Total                                                | 270 hours |
Coursework must come from a qualifying institution and cover the required content outlined in the BACB’s Fourth Edition Task List and Course Content Allocation documents. Only graduate (i.e., master’s or doctoral) courses where the applicant was formally enrolled and earned a passing grade (“C” or better for graded courses) are acceptable. Coursework may come from an Association for Behavior Analysis (ABAI) Verified Course Sequence (VCS), although other coursework may also be acceptable.

Coursework that is not from an ABAI VCS must be reviewed in order to determine whether it covered the required content for the minimum number of instructional hours. The BACB will only make determinations about the acceptability of non-verified coursework as either (a) part of a formal application for exam or (b) an independent application for coursework evaluation. A combination of ABAI VCS and other coursework may also be acceptable. Regardless of whether coursework is obtained from an ABAI VCS, every applicant must demonstrate that his or her coursework covered all the required content for the minimum number of hours per category. The coursework requirements for BCBA certification will change as of 2022. Please review the BACB website for more information.

Q. Does this policy change include Board Certified assistant Behavior Analysts (BCaBA’s)?

No. The QBHP policy only applies to master’s level practitioners who are working toward a BCBA.

Q. What about the QBHPs who have completed only part of the coursework as of January 1, 2020?

They can continue working as a QBHP until September 30, 2025 or 2 years after completing their coursework.

Q. Is there a grace period or “grandfathering” for current QBHP’s who completed coursework over two years ago?

No. QBHPs who have exceeded two years from completing their coursework will need to be certified as a BCBA by January 2020 to continue to provide ABA services as a Michigan Medicaid provider.

Q. What if a QBHP had completed coursework and needs to complete the fieldwork component?

The QBHP has two years from the completion of their coursework to complete the remaining requirements, including fieldwork, to be certified as a BCBA.

Q. There are QBHPs who have been unsuccessful in passing the certification exam. Can QBHPs continue to provide ABA services while awaiting the next exam period with proof a registration for the next exam?

No. If on January 1, 2020 it has been more than two years since the QBHP completed the course sequence, the QBHP will not be able to provide ABA services.

Q. Does the policy apply to licensed psychologists (LP’s and LLP’s) working as QBHP’s?

This policy applies to all professionals working as a QBHP regardless of their licensure and degree concentration.

Q. What is the goal of having QBHPs as qualified providers Medicaid Autism ABA Services?

The QBHP provider level was created to assist with capacity due to the lack of certified behavior analysts in Michigan to meet all health care needs for hospitals, provider agencies, universities. The intent of the QBHP is to expand professionals implementing ABA services who are licensed professionals with a year of experience treating individuals with ASD.

Q. When will QBHPs who take the November 2019 certification exam be notified of their results?

The November 2019 examination results for BCBA candidates should be available by mid December 2019. The BACB provides the results and updates the national registry (not MDHHS).
Q. Does this policy affect the licensure rule for BCBAs?

No. All board-certified behavior analysts and board-certified assistant behavior analysts are required to be licensed by January 7, 2020.

Q. How much time do professionals who pass the BCBA exam have before they must be licensed by LARA?

All BCBAs (current and future new BCBAs) must be licensed by LARA to provide ABA services in Michigan. New BCBAs are encouraged to apply for licensure immediately after receiving notification of passing the certification exam.

Q. Is MDHHS aware this policy may reduce the number of QBHPs providing Medicaid Autism ABA Services?

Yes. MDHHS is aware there may be QBHPs no longer qualified to provide Medicaid Autism ABA services. It is recommended BCBA’s supervising the QBHPs and the caseload of children be aware of the status of the QBHPs’ progress toward passing the certification to be a BCBA.