



STATE OF MICHIGAN

GRETCHEN WHITMER
GOVERNOR

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ROBERT GORDON
DIRECTOR

April 1, 2020

To: Executive Directors, Pre-paid Inpatient Health Plans
Executive Directors, Community Mental Health Services Providers

From: Jeffery L. Wierich, MA, LLP, Director *JW*
Bureau of Community Based Services
Behavioral Health and Developmental Disabilities Administration

RE: Behavioral Health Treatment/Applied Behavior Analysis Service COVID-19 Response

With the current COVID-19 pandemic, the Michigan Department of Health and Human Services (MDHHS) will temporarily suspend current policy standards for Behavioral Health Treatment supervisors, including a qualified Licensed Psychologist (LP), Limited License Psychologist (LLP), and master's prepared Qualified Behavioral Health Professionals (QBHP) that require QBHP's certification as a BCBA within two years of successfully completing their applied behavior analysis (ABA) graduate coursework.

Additionally, MDHHS will relax training required and the minimum clinical observation and direction (i.e. one hour of every 10 hours) of direct ABA treatment for Behavior Technicians (BTs) during the effective period mentioned below. Required training will be limited to universal precautions, competency for completing BACB required tasks, and the ability to effectively communicate with the individual. Program-specific training requirements would be completed as soon as possible once the effective period ends. The use of eligible individuals as alternative ABA staff resources must be recorded as a comment on the provider claim and in the beneficiary record (i.e., Plan of Care, Person-Centered Service Plan, or Plan of Service).

This guidance will be in effect for 30 days following the termination of the Governor's Declaration of a State of Emergency Order (2020-04, COVID-19), or on the first of the following month, whichever is later.

Please direct any questions or concerns to the provider qualifications mailbox:
MDHHS-ProviderQualificationCode@michigan.gov

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