NORTH CAROLINA ASSOCIATION OF
PUBLIC COMMUNITY
HEALTH PLANS

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RB-BHT Reform Recommendations

Presentation to the
Joint Legislative Oversight Committee on Medicaid
April 7, 2026

Research-Based Behavioral Health Treatment (RB-BHT)

- RB-BHT services prevent or minimize the behavioral challenges associated with Autism Spectrum Disorder and promote adaptive functioning
- Primary treatment utilized in NC Medicaid's RB-BHT benefit is called Applied Behavioral Analysis (ABA)
- Services are primarily delivered to children age six and under
- Should be tailored to an individual's needs, goals, and abilities

Background on ABA

July 2017	ABA added to Medicaid State Plan
August 2019	NC Medicaid increased the number of hours available under the Clinical Coverage Policy
July 2021	Standard Plans launched with open networks Coverage expanded to individuals over age 21
January 2024	Medicaid increased ABA reimbursement rates by 15%
July 2024	Tailored Plans launched LME/MCOs required to open network for ABA providers

Current ABA Trends in Medicaid

North Carolina Trends	• Unprecedented increase in Medicaid spending on ABA
	  • 347% growth between 2022 and 2025
	  • ABA enrollment grew from 3,844 (2022) to 13,447 (2025), a ~250% increase
	• Increase in alleged provider fraud, waste, and abuse

National Trends	• Autism therapy is the fastest-growing area of spending • States paid autism therapy providers $2.2B in 2023, up from $660M four years earlier • Drivers include increase in diagnoses, high hourly rates, and private equity entering the market • Earlier this year, a federal report alleged that Colorado made $77.8M in improper payments for ABA

Objectives of Recommended Reforms

- Ensure that children and youth with autism have access to medically necessary, high-quality care
- Stabilize Medicaid spending and utilization at a sustainable level



ABA Reform Priorities

1. Close the network for ABA
2. Enforce and update licensure requirements for facilities providing ABA
3. Allow LME/MCOs to terminate or suspend providers they have referred for potential fraud while the investigation is ongoing
4. Require a conflict-free assessment approach that minimizes risk of self-referral or inappropriate utilization
5. Amend NC Medicaid Clinical Coverage Policy 8F for ABA

Recommendations for Strengthening the Clinical Coverage Policy

- Set limits on services delivered by telehealth; specify activities that require minimum in-person versus remote format
- Require parent/family involvement in treatment
- Strengthen reauthorization criteria
- Ensure staff delivering care are supervised by a qualified individual who resides in North Carolina
- Clarify provider types authorized to diagnose ASD and refer to ABA (prevent self-referral and establish conflict-free assessment and referral pathways)
- Clarify billable services vs. observation and direction

Questions?

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