

IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS BT202558 MAY 8, 2025

This bulletin has been updated. See IHCP Bulletin [BT202596](#). The enforcement deadline for requiring the rendering provider NPI to align with the procedure code modifier on an ABA therapy services claim is Aug. 1, 2025.

ABA provider enrollment requirements due soon; submit enrollment applications by May 25

As announced initially in *Indiana Health Coverage Programs (IHCP) Bulletin* [BT2024194](#), the IHCP will require a rendering provider National Provider Identifier (NPI) on a claim billed for applied behavior analysis (ABA) therapy services to align with the procedure code modifier indicating the level of the ABA therapy provider that rendered the service. This requirement will be effective for dates of service (DOS) on or after July 1, 2025 (as announced in *IHCP Bulletin* [BT202539](#)).

All the actions in this bulletin must be completed by July 1, 2025, to ensure there is no interruption in billing. To ensure proper time to complete the processing of the enrollment application, please submit all enrollment applications and fingerprints **no later than May 25, 2025**.



Specifically, ABA therapy providers must take the following actions:

- **Credentialed Registered Behavioral Technicians (RBTs)** must enroll under provider type 11, provider specialty 625 – *Applied Behavior Analysis (ABA) Therapist (Registered Behavior Technician [RBT])*. Newly enrolled providers with this specialty will be classified as high risk upon initial enrollment and require the submission of a fingerprint-based background check. Modifier U1 will not be billable unless the rendering provider is enrolled under provider specialty 625.
- **Board Certified Assistant Behavioral Analysts (BCaBAs)** must enroll under provider type 11, provider specialty 624 – *Applied Behavior Analysis (ABA) Therapist (Bachelors)*. Newly enrolled providers with this specialty will be classified as high risk upon initial enrollment and require the submission of a fingerprint-based background check. Modifier U2 will not be billable unless the rendering provider is enrolled under provider specialty 624.
- **Existing doctoral-level Board Certified Behavior Analyst-Doctoral (BCBA-D), masters-level Board Certified Behavior Analysts (BCBA) and health service providers in psychology (HSPPs)** are now considered high-risk level providers. This high-risk classification requires the submission of a fingerprint-based background check. Providers enrolled under specialty 615 – *Applied Behavior Analysis (ABA) Therapist (Masters/Doctoral or HSPP)* that have not been recertified as high-risk will not be able to bill after July 1, 2025.
- **Existing group providers** are now considered high-risk level providers. This high-risk classification requires the submission of a fingerprint-based background check for individuals with a greater than 5% ownership in the organization. Group providers that have not been recertified as high risk will not be able to bill after July 1, 2025.

For more information on provider enrollment, see the [Provider Enrollment](#) webpage or the [Provider Enrollment](#) provider reference module at in.gov/medicaid/providers.

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