



October 2, 2025

### **Applied Behavior Analysis (ABA) Services: Documentation Requirements and Training Opportunities**

Dear ABA Provider,

Kern Health Systems (KHS) has contracted with All Med Healthcare Management, effective September 9, 2025, to perform medical necessity review for Behavioral Health Treatment (BHT)/Applied Behavior Analysis (ABA) services.

As a reminder, [Policy 21.06-P – Behavioral Health Treatment Responsibilities for Members Under the Age of 21](#) was finalized and posted in May 2023. This policy is aligned with the current All Plan Letter (APL) 23-010 Responsibilities for Behavioral Health Treatment Coverage for Members under the Age of 21, which outlines Medi-Cal Managed Care Plans' responsibilities under the EPSDT standard.

#### **Required Documentation for All ABA Referrals**

The required documentation has not changed and remains consistent with the standards outlined in APL 23-010 issued on May 4, 2023, and updated on November 22, 2023.

Please ensure that the following 11 elements are submitted with all ABA referrals for treatment:

1. **Patient Summary:** Include demographics, referral reason, background (home/school/work), clinical interview summary, review of recent assessments, assessment procedures/results, and a description of evidence-based BHT services.
2. **Behavior & Treatment Plan:** Detail the frequency of baseline behaviors and the specific treatment interventions planned to address them.
3. **Treatment Goals:** Identify measurable long-term, intermediate, and short-term goals that are specific, behaviorally defined, developmentally appropriate, and based on clinical observations. The goals should be presented and documented in alignment with nationally recognized Applied Behavior Analysis (ABA) guidelines and industry standards.
4. **Outcome Measurement:** Specify the criteria and tools used to measure progress toward behavioral objectives.
5. **Current Level of Need:** Provide baseline data, expected outcomes, mastery criteria, goal start dates, estimated mastery dates, generalization plans, and goal status (met, unmet, or modified, with explanation).
6. **Evidence-Based Interventions:** Ensure all interventions are evidence-based and individualized, following recognized ABA clinical guidelines.
7. **Service Details:** Specify type and number of direct services, supervision, caregiver training/support, frequency of progress monitoring, crisis/transition plans, and provider roles.

# PROVIDER Bulletin



## KERN HEALTH SYSTEMS

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8. **Care Coordination:** Document collaboration with each of the following, as applicable: guardians, schools, state disability programs, and other relevant systems involved in the Member's care. Coordination with each entity is required to support a comprehensive treatment approach. If coordination with any individual party is not completed, a clear justification must be provided explaining the reason and any attempts made to establish contact.
9. **Service Hours Justification:** Consider the Member's age, school, and daily activities without reducing Medically Necessary BHT hours due to school or other commitments.
10. **Service Setting:** Provide services in the most clinically appropriate setting (e.g., home, school, community, clinic). Hours must reflect medical necessity in each setting.
11. **Exit Plan:** Define criteria for reducing or terminating services, which must align with the EPSDT standard. Include termination benchmarks and a transition strategy.

### Upcoming Provider Trainings

We understand there has been some confusion about what documentation is needed to fully meet the requirements outlined in APL 23-010.

To assist providers, KHS will be offering training sessions starting October 2025, covering:

- Required clinical documentation standards
- Best practices for compliance
- Guidance on APL 23-010 expectations

Access to Bulletins and Policies can be found on the KHS website, [www.kernfamilyhealthcare.com](http://www.kernfamilyhealthcare.com), by choosing Provider, then Bulletins or Policies and Procedures.

We encourage you to visit the site regularly to stay informed of important changes, updates, and announcements.

If you have any questions, please contact your Provider Relations Representative at 1-800-391-2000, and select option #5 when prompted.

Sincerely,

Melinda Santiago  
Director of Behavioral Health  
Kern Health Systems

*Reference:*

<https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2023/APL23-010.pdf>