

Aaron Morris | Interim Chief Executive Officer

J. Kevin Stitt | Governor

OHCA 2026-14

July 30, 2026

Re: **Applied Behavior Analysis Service Quality Reviews**

Dear Provider,

OHCA's mission is to ensure SoonerCare members receive high-quality, medically necessary care. Following our collaborative Applied Behavior Analysis (ABA) educational reviews that began in August 2025, we are taking the next step to support service excellence, eliminate inappropriate billing, and ensure compliance.

What's Changing?

Effective September 2026, OHCA will fully implement the Service Quality Review (SQR) process for all ABA providers, as outlined in Oklahoma Administrative Code [317:30-5-318](#). Reviews that reveal non-compliance may result in full or partial penalties, a request to retract billing and bill correctly, or a direct referral to Program Integrity.

What Action Do I Need to Take?

OHCA will contact you when your SQR date is approaching. However, providers can start preparing now.

Educational reviews have indicated the following areas of concern:

- Non-contracted and uncertified RBTs rendering services.
- Documentation not aligned with AMA guidelines for the billed CPT codes.
- Lack of guardian/clinician signatures on treatment plans.
- Treatment plans not aligned with policy requirements.
- Lack of individualized treatment plans.
- Billing for potential non-therapy time such as naps.
- Start and stop times not clearly identified on notes.
- Lack of documentation clarity on who rendered the service.
- Lack of adequate parent training.
- RBTs or BCaBAs completing functional behavioral assessments.

- Billing services under the BCBA instead of the correct rendering provider.
- Billing with no documentation to outline services rendered.
- Documentation in the record not reflective of the number of units billed (i.e., 20 hours billed, but only 10 hours of documentation in the record).

To prepare for your next SQR, we strongly recommend the following actions:

- Review the OHCA ABA policy within Part 30, [Applied Behavior Analysis \(ABA\) Services](#).
- Review the OHCA ABA educational materials available on our [Provider Training](#) webpage.
- Conduct a proactive internal audit of your member files. Ensure treatment plans are fully signed, documentation supports the hours billed, and CPT billing codes align with documented services.
- Verify provider enrollment within your practice to ensure certifications/licenses are current and valid.

For questions related to the SQR process, contact the OHCA Behavioral Health Unit at 800-522-0114 and have your provider ID ready. Select Option 1 for Provider, Option 6 (prior authorizations), then Option 2 (behavioral health authorizations).

Sincerely,

Oklahoma Health Care Authority