

Autism Care Demonstration (ACD): Recoupment for Applied Behavior Analysis (ABA) providers



ABA providers must comply with medical documentation and billing practices listed in the [TRICARE Operations Manual \(TOM\), Ch.18, Sec. 4](#). Providers who fail to demonstrate compliance are subject to additional training and payment recoupment as required by policy.

Reasons for recoupment

- Improper CPT code used: noncompliance with Adapted Behavior Services (ABS)-approved CPT code (*TOM Ch. 18, Sec. 4, Para. 8.9.8*)
- Improper units used (*TOM Ch.18, Sec.4, Para. 8.9.7*), including session start or end time
- Improper rendering provider listed (*TOM Ch. 18, Sec. 4, Para. 8.9.7*)
- Improper certification of provider (*TOM Ch. 18, Sec. 4, Para. 8.2*). If you have questions or concerns about provider certification, please contact HMCDProviderInquiries@humanamilitary.com
- Excluded services and supplies provided: a session note that appears to document any of these exclusions may result in a recoupment ([Ch. 18, Sec. 4, Para. 8.10](#))
- Missing medical records: providers who receive requests for medical records are required to submit the requested medical record in its entirety to Humana Military, per 32 CFR 199.4(a) (5)

Tips for avoiding recoupment

- Familiarize yourself with *TOM, Ch.18, Sec. 4* requirements
- Document all required elements in progress notes, per the [Autism Center of Excellence website](#).
- Confirm that billed claims have corresponding medical documentation
- Provide services in line with ABS-approved CPT code requirements
- Avoid exclusions
- Submit all medical records for ABA services rendered when medical records are requested for a specific patient and date of service