



Wes Moore, Governor · Aruna Miller, Lt. Governor · Meena Seshamani, M.D., Ph.D., Secretary

MARYLAND MEDICAL ASSISTANCE PROGRAM
Applied Behavioral Analysis Transmittal No. 10
April 3, 2026

TO: Applied Behavior Analysis Providers

FROM: Lorena de Leon, Director *Lorena de Leon*
Office of Medical Benefits Management

RE: Applied Behavior Analysis Referring Provider Requirements

NOTE: **Please ensure that appropriate staff members in your organization are informed of the contents of this transmittal.**

This transmittal updates guidance regarding referring practitioners for Applied Behavior Analysis (ABA) services. Effective July 1, 2026, ABA providers will be required to submit the National Provider Identifier (NPI) of the referring practitioner and are responsible for verifying active enrollment on all monthly claims submissions.

42 CFR § 455.440 requires that all claims for items and services that were ordered or referred contain the NPI of the ordering or referring practitioner. In accordance with COMAR 10.09.28, individuals must be referred for ABA services by a qualified, licensed professional. The referring provider must be enrolled as a Medicaid provider and active on the date of service. ABA providers are responsible for ensuring that the referring practitioner meets these requirements prior to rendering and billing for services. Providers can find the full list of the qualified provider types who may refer participants for ABA services on page 7 of the ABA Provider Manual.

To come into compliance with these requirements, Maryland Medicaid will deny ABA claims for dates of service starting July 1, 2026, if the referring practitioner is not actively enrolled with Maryland Medicaid on the date of service. Providers can verify a referring practitioner's enrollment status using the [Provider Verification System](#).

To receive payment, an ABA provider's claim must include the NPI of an individual referring practitioner in the Referring Provider field (Field 17b). Claims will not be reimbursable if the

referring practitioner's NPI is a group or facility. Claims that fail to meet these criteria for the referring practitioner field will be denied.

Providers may start submitting claims through the Behavioral Health Administrative Services Organization (BHASO) with the referring practitioner prior to July 1, 2026. If providers choose to submit these claims prior to July 1, 2026, BHASO can monitor the enrollment status of the referring practitioners and conduct outreach to practitioners who are not actively enrolled with Maryland Medicaid.

For questions related to this transmittal, please contact mdh.aba@maryland.gov.