



Ellen M. Buettner | Chief Executive Officer

J. Kevin Stitt | Governor

OHCA 2025-06

February 26, 2025

Re: High Risk Screening Requirement Update for Applied Behavioral Analysis (ABA) Groups and Board-Certified Behavioral Analysts (BCBAs)

Dear Provider,

Effective **April 1, 2025**, Applied Behavioral Analysis (ABA) groups and Board-Certified Behavioral Analysts (BCBAs) will be designated as high risk for screening and contracting purposes. This change aligns with Oklahoma Administrative Code (O.A.C.) 317:30-3-19.4 and federal regulations under 42 CFR § 455.452, which grant the Oklahoma Health Care Authority (OHCA) the authority to conduct additional screenings and background checks as necessary.

As outlined in O.A.C. 317:30-3-19.4(2), federal law requires OHCA to categorize all providers into "limited," "moderate" or "high" risk levels. When a provider falls into multiple risk categories, the highest level of screening is applied.

ABA groups and BCBAs will be subject to the following high-risk screening requirements:



ADDRESS

4345 N. Lincoln Blvd.
Oklahoma City, OK 73105



WEBSITES

oklahoma.gov/ohca
mysoonerCare.org



PHONE

Admin: 405-522-7300
Helpline: 800-987-7767

Requirement	Who is Affected?	What's Next?
Physical site visits	Existing and future contracts for: <ul style="list-style-type: none"> • Applied Behavioral Analysis (ABA) groups • Board-Certified Behavioral Analysts (BCBAs) 	Starting April 1, 2025 , OHCA will begin reaching out to schedule a site visit; however, some visits may be unannounced. If your location is closed during an attempted site visit, we will coordinate with you to arrange another one. Please note that without a successful site visit, OHCA cannot proceed with enrollment or reenrollment; active contracts may be subject to termination.
Fingerprint-based criminal history checks	<ul style="list-style-type: none"> • New enrollments • Reporting a change in ownership after March 1, 2025 	Fingerprints from all BCBAs and individual owners with a 5% or more direct or indirect ownership interest are required. Fingerprint cards will be sent to the mailing address listed on the SoonerCare application, along with instructions on completing the process and returning the cards.

Thank you for your continued support and the services you provide to SoonerCare members.

Sincerely,



Melody Anthony
Interim State Medicaid Director