

# IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS    BT2026162    SEPTEMBER 29, 2026

## IHCP requires functional behavior assessments for ABA therapy and behavior intervention plan

The Indiana Health Coverage Programs (IHCP) has received reports that behavior intervention plans (BIPs) have been included in applied behavior analysis (ABA) therapy treatment plans that do not include a functional behavior assessment (FBA). Effective **Oct. 29, 2026**, the IHCP will require a complete FBA for each behavior targeted by a BIP to ensure quality services for members related to behavior intervention plans.

Moreover, an FBA is standard clinical practice and is necessary to demonstrate that the provider has followed clinical standards to identify the function of the challenging behavior, and identify functionally equivalent replacement behaviors, and then incorporate this information into the BIP. Providers must be mindful of the [Ethics Codes for Behavior Analysts 2.08, 2.09, 2.13, 2.14, 2.15, 2.16, 2.17, 2.18 and 3.12](#) that can apply to the FBA and BIP process.



### Required FBA components when a BIP is present

Documentation of and results of the following are required for an FBA:

- Use of at least one of the following function-based indirect assessments with parent/guardian and/or Registered Behavior Technician (RBT)
  - ⇒ Questions About Behavioral Function (QABF)
  - ⇒ Functional Analysis Screening Tool (FAST)
  - ⇒ Motivation Assessment Scale (MAS)
  - ⇒ Motivating Analysis Rating Scale (MARS)
  - ⇒ Problem Behavior Questionnaire (PBQ)
  - ⇒ The Functional Analysis Interview (FAI)
    - Results must be compiled in a visual graph, and original function-based indirect assessment responses included
- Antecedent, Behavior, Consequence (ABC) Data for the target behavior
- Identified triggers and precursors to the target behavior if applicable
- Hypothesized function statement referencing results of indirect assessment and ABC data

These items must inform a robust BIP. A BIP must reflect antecedent and consequence strategies that align with the functional results of the FBA, as well as inform functionally equivalent replacement behaviors to the target behavior in the antecedent and consequence sections of the BIP.

The FBA must be updated with new function-based indirect assessment results, recent ABC data, identified triggers and precursors to the target behavior if applicable, and hypothesized function statement referencing the results of indirect assessment and ABC data for each reauthorization within the treatment plan.

It is up to the discretion of the provider to identify when a functional analysis (FA) is necessary, and which FA assessment method is most appropriate for the member. If a provider deems an FA necessary, the assessment tools for the FA and results must be included in the treatment plan in addition to the required FBA documentation above.

## FBA results to inform BIP

When the FBA is complete, the results must be integrated into the BIP to ensure the member is receiving an intervention that addresses the functional needs of the target behavior. Required BIP components:

- Operational definition of the target behavior
  - ⇒ Examples and nonexamples included
  - ⇒ Offset criteria included
  - ⇒ Function based *and/or* topography based
- Identified precursor behaviors if applicable
  - ⇒ Deescalation procedures or methods to be used when precursor behaviors occur
  - ⇒ May or may not include functionally relevant replacement behaviors
- Antecedent interventions that must include:
  - ⇒ Functionally equivalent replacement behaviors that can be taught or used proactively
- Consequence interventions
  - ⇒ Functionally equivalent replacement behaviors that can be taught or used reactively

When the function of the behavior obviously changes, the interventions become ineffective, or when the FBA yields a different functional result, the BIP must be updated to reflect the relevant and accurate function of the target behavior.

## QUESTIONS

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