

Effective Date	11/15/2021
Review Dates:	1/16/2019, 10/8/2020, 11/01/2021, 11/9/2022

Purpose:

An integral part of Connect Plus Therapy’s business model is ensuring our clients are able to receive meaningful ABA services as a direct result of our staff operating in compliance with documentation and data requirements. This policy was designed to help staff understand the impact of their work, obtaining the contractual set forth pay for such services and CPT’s ability to realize revenue following the excellent work that they do. Failure to comply with this policy can have adverse and swift impact on Connect Plus’ desire and ability to retain clients and reimburse staff according to labor law regulations.

Scope:

This policy applies to all Connect Plus Therapy employees providing ABA services.

Policies and Procedures:

- I. After providing therapy to any client of Connect Plus Therapy, all Behavior Technicians and BCBA’s are expected to write their session notes within the last seven minutes of each session and have the parent/guardian sign.
 - A. Timely conversions allow for the most accurate session notes, resulting in the best treatment for our clients.
 - B. Session notes are critical to submit billing claims to the insurance carriers who contract CPT’s services.
 - C. Conversions are a proof of “time worked” and are the timesheets of BCBA’s as well as BTs. Failure to convert in a timely manner may lead to delayed or inaccurate paychecks for employees.
 - D. The parent/guardian signatures are proof of services rendered.
- II. All session notes written by both the BCBA and Behavior Technician must include:
 - A. Subjective written narrative with explicit detail about that session (4-5 sentences in length minimum).
 - B. Objective data (which can be automatically pulled from the data collected option).
 - C. Assessment of the client’s performance and a plan for future treatment.
 - D. This format is referred to in the medical world as SOAP notes and becomes a part of the client’s legal medical record.

E. Session Notes should reflect the length of treatment that was delivered in terms of details given. Time changes must be made ***BEFORE*** sessions are converted.

F. Please review the session notes rubrics and session note guidelines for more details.

III. Converting Notes:

A. **All Behavior Technicians and BCBA's are required to convert appointments at the time of service, but not later than the 1st and 16th of each month.**

1. Changes to the session (time change, date change, provider change, appointment type) must be entered as a task in CentralReach. Edits are usually made within one business day (Exemptions for ***ONLY*** time changes apply in our Lakewood location; BT may change session times themselves).
2. Errors while converting must be communicated via CentralReach task to the admin team immediately.
3. Non-conversions marked after the 1st and 16th of each month will lead to disciplinary actions as specified in section III B.
4. Non-converters will be emailed a reminder to convert the missing sessions after the 1st and 16th of each month. If the sessions aren't converted two weeks after the email was sent or issues aren't communicated to the admin team, CPT will consider the sessions as cancelled and they will be removed from the calendar.

B. Disciplinary action will be taken for late conversions as follows:

1. 1st late conversion--No correction action.
2. 2nd & 3rd late conversions--Verbal warning.
3. 4th & 5th late conversions--Written warning.
4. 6th conversion--Final warning.
5. 7th late conversion--Separation of employment.

C. Excused Late Conversions

1. Connect Plus Therapy understands that emergencies can happen and could cause an employee to convert an appointment late. If an emergency happens (i.e. an employee is hospitalized), the admin team must be notified as soon as possible. Continuous requests for exceptions may be denied, leading to the need for counseling or formal disciplinary actions.

D. Assistance with Converting Appointments

1. If an employee is unsure how to convert an appointment, they are encouraged to contact the admin or clinical team for assistance. Additional task analysis, training videos and support material is accessible on the Intranet.

IV. Legal Background:

A. The False Claims Act and Health Care Claims Fraud Act

1. Billing of provided services (including correct code, time/date of service, session notes, provider information, etc.) is regulated by Federal and State laws and

wrongful entries (unknowingly or consciously) are considered a violation of these laws.

2. Violations of the above listed service entries are considered a felony and can result in fines (up to \$150,000 or five times the amount of the claim) and prison time (up to 5 years) for the individual employee.
3. Converted sessions are a confirmation of services provided and fall into the scope of the mentioned laws.