

Effective Date	11/15/2021
Review Dates:	1/16/2019, 10/8/2020, 11/01/2021, 11/9/2022, 4/3/2023

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, sign their session note, and have the parent/guardian sign the timesheet.
 - 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 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. Provider signatures on the timesheet and session note are verification that all information entered into the note is accurate and true.
 - E. 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 (2-5 sentences in length minimum).
 1. Narratives must be unique and accurately represent the services provided.
 - a) A new narrative must be written for each session and cannot be copied

and pasted. Narratives cannot be used for multiple sessions.

- b) Each appointment with the client is considered a session. Every time billing is stopped a session will end, when billing resumes, a new session will begin. (For example, if you work with a client from 9:00 AM -12:00 PM, stop billing for lunch, and resume with the client from 12:30-3:00, this would be considered 2 sessions.)

2. Narratives should include information about the client's progress toward goals and client's response to interventions.
3. Objective data (which can be automatically pulled from the data collected option).
4. Data must be collected for each session and the data must be unique to the session.

B. Assessment of the client's performance and a plan for future treatment.

C. This format is referred to in the medical world as SOAP notes and becomes a part of the client's legal medical record.

D. 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.

E. 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 no later than 6 days after the date of service. The 6-day window is a grace period to account for any emergencies or issues that may arise.**

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.
2. Errors while converting must be communicated via CentralReach task to the admin team immediately.
3. Non-conversions marked after the 6-day grace period will lead to disciplinary actions as specified in section III B.
4. Non-converters will be emailed a reminder to convert the missing sessions weekly. Each follow-up attempt will be tracked and progressive disciplinary action will be taken as needed.
5. If sessions are not converted after the first follow-up email, and no issues have been relayed to the administrative team, a second email will be sent the following week. If the appointment has not been converted by the 3rd week a phone call will be made to the employee and a follow-up email will be sent. Any appointments remaining after this time period will be cancelled and removed from the

employee's calendar. Each follow-up attempt will be tracked and progressive disciplinary action will be taken as needed.

6. If the sessions aren't converted one month after the initial email was sent or issues aren't communicated to the admin team, CPT will consider the sessions as canceled 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 occurs (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 are accessible on the Intranet.

IV. Tracking and Monitoring

- A. Administrative Directors will run the unconverted report on a weekly basis
- B. Administrative Directors will track unconverted appointments on the ops sheet and provide feedback and progressive discipline as indicated in the core process.

V. 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.