



## Ethical Billing and Business Practices for Behaviour Analysts

As behaviour analysis is currently unregulated in Ontario, there are no formal guidelines governing billing and business practices. However, ONTABA encourages behaviour analysts to be familiar with and adapt the practice recommendations made by other certification bodies and regulated health professionals. You may also find these resources helpful in understanding how your behaviour analyst should bill for your or your family members' ABA services.

For example, autistic adults or caregivers of children and youth diagnosed with autism spectrum disorder may wish to review the following documents. Although these guidelines have been developed by the Behaviour Analyst Certification Board (BACB®), which is a certification body in the United States, many Ontario behaviour analysts are certified through the BACB and follow their recommendations.

[Applied Behavior Analysis Treatment of Autism Spectrum Disorder: Practice Guidelines for Healthcare Funders and Managers, 2nd Edition \(The Council of Autism Service Providers, 2020\)](#)

[Behavior Analyst Certification Board Professional and Ethical Compliance Code \(BACB®, 2019\)](#)

Resources developed for psychologists in Ontario may also help behaviour analysts make decisions related to billing. You may find these resources helpful in understanding how your behaviour analyst should be billing for services.

[Canadian Code of Ethics for Psychologists, Fourth Edition \(Canadian Psychological Association, 2017\)](#)

[College of Psychologists of Ontario \(CPO\) Standards of Professional Conduct \(CPO, 2019\)](#)

[Ontario Psychological Association \(OPA\) Guideline for Fees and Business Practices \(OPA, 2015\)](#)

Based on the recommendations contained in the above resources, ONTABA has created a list of do's and don'ts for ethical billing and business practice. While not exhaustive, these provide a starting point for clients to understand ethical billing and business practices for behaviour analysts.

## Ethical Billing and Business Practice Do's and Don'ts

### Things your behaviour analyst should do

1. Obtain your informed, written consent for billing and invoicing procedures before you or your family member starts services and if these procedures change.
2. Carefully review the policies for missed or cancelled appointments with you, and describe any fees for late payments.
3. Explain any collections procedures they use, including the specific information that would be disclosed should a collections agency be used.
4. Provide invoices for services rendered within an agreed upon timeframe.
5. Bill accurately and in a manner that is clear and easy for you to understand. This includes but is not limited to the following: your name, date and duration of service, type of service, cost per hour, total cost of service, date payment is due.
6. Recommend the amount, length and type of service that is consistent with research and sound clinical practice, including the BACB guidelines.
7. Safeguard your funds (e.g., separate bank account, segregated in accounting system) if you choose to prepay.
8. Keep all billing records in the same manner and for the same duration as your clinical records.
9. Grant you timely access to billing records upon your request.
10. Offer a sliding payment scale (e.g., fees may vary based on a client's ability to pay) when possible and appropriate.

### Things your behaviour analyst should NOT do

1. Make retroactive changes to fees for services you or your family member have already received.
2. Accept gifts (including monetary "kickbacks") from people they are working with or for referrals they make to other providers.
3. Require that you pay for services using only one specific method (e.g., credit or debit only).
4. Require you to pre-pay for services if you would prefer to pay as you go. (See Do #7.)
5. Invoice for services that were not delivered.
6. Invoice for additional hours that were not delivered.
7. Bill for ABA services if another service was actually provided (e.g., occupational therapy services should be billed as occupational therapy services NOT ABA services).
8. Make service recommendations based on available funding.
9. Offer rebates for prompt payment of an account.
10. Discharge you from services in order to make room for clients who would likely require more hours or who pay a higher rate.