



Ethical Billing and Business Practices for Behaviour Analysts

As behaviour analysis is currently unregulated in Ontario, there are very few resources that provide guidelines to behaviour analysts when billing for ABA services. Until such a time when billing guidelines are developed specifically for behaviour analysts practicing in Ontario, it may be beneficial to draw from resources and guidelines developed by other certification bodies and regulated health professionals. For example, behaviour analysts working specifically with children and youth diagnosed with autism spectrum disorder may wish to refer to the following documents:

[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 \(BACB®, 2019\)](#)

Additional resources, that provide suggestions regarding decision making when billing for services, have been developed for psychologists in Ontario. These may also be helpful to behaviour analysts.

[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, we have created a “do” and “don’t” list for ethical billing and business practice. While not exhaustive, these provide a starting point for behaviour analysts to establish and implement ethical billing and business practices.

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

DO	DON'T
<ol style="list-style-type: none"> 1. Obtain informed, written consent for billing and invoicing procedures before a client starts services and before making any changes to these procedures. 2. Carefully review policies for missed or cancelled appointments, and any fees for late payments. 3. Explain any collections procedures including the specific information that would be disclosed. 4. Provide invoices within an agreed upon timeframe. 5. Bill accurately and in a manner that is clear and easy to understand by clients. This includes but is not limited to the following: name of client, date and duration of service, type of service, cost per hour, total cost of service, date payment is due. 6. Recommend service intensity and duration in a manner consistent with the research literature and sound clinical practice, including the BACB guidelines. 7. Safeguard clients funds (e.g., separate bank account, segregated in accounting system) <u>if</u> a client chooses to prepay. 8. Keep all billing records in the same manner and for the same duration as clinical records. Allow for timely access to billing records upon client request. 9. Offer a sliding scale (e.g., fees vary based on a client's ability to pay) when possible and appropriate. 10. Create an invoice and receipt and properly document (i.e., account for) all monies accepted from clients. 	<ol style="list-style-type: none"> 1. Make retroactive changes to fees for previously delivered services. 2. Accept money or gifts for referrals. 3. Require clients to pay using only a specific method (e.g., credit or debit only). 4. Require clients to pre-pay for services <u>if</u> they would prefer to pay as they go. (See Do #7.) 5. Invoice for a service that did not occur or invoice for other services (e.g., Occupational Therapy) as ABA services. 6. Invoice for additional hours that were not delivered. 7. Make service recommendations based on available funding. 8. Offer rebates for prompt payment of an account. 9. Prematurely discharge clients who are paying on a sliding scale to make room for clients paying the full rate. 10. Accept cash payments for services without properly documenting the service.