

# Continuity of Services:

Managing Service Interruptions, Transitions, and Discontinuations

## Welcome!

Ready to launch a highly effective, stress-free continuity of services plan? We've got you covered. This easy-to-use toolkit will help you prepare to best support your clients by providing continuity of services when faced with an interruption, transition, or discontinuation.

When might these changes in service continuity occur? Well, you might discontinue a client's services at the request of the client or a relevant stakeholder—or, after a significant period of time, you may identify that a client is not benefiting from services. You might even transition a client to another practitioner within your organization because you are leaving the organization or because you received a promotion. Service interruptions may be planned (e.g., leave of absence, extended vacation, medical leave) or unplanned (e.g., car accident, illness, unexpected decreases in staff availability).

Our step-by-step process, customizable checklists, and handy resources will transform your clients' continuity of services experience into a reliable, ethics-compliant process. The result? Clients are safeguarded, processes run smoothly, communication thrives, and everyone feels confident and knowledgeable.

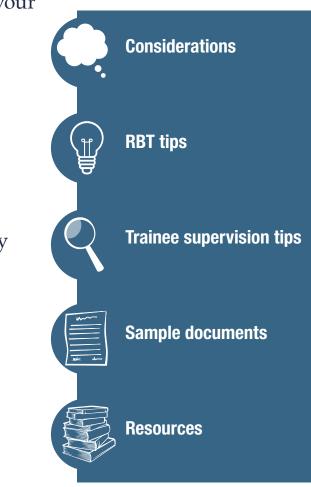
Your vision of a stress-free process will become a reality as you move through each familiar stage of assessing, designing, implementing, and evaluating your plan. And by the end, you'll have peace of mind knowing that you and your clients are protected.

## Steps

As you move through this toolkit, you'll follow these familiar steps to create and execute your new or improved plan:

- 1. Assess
- 2. Design
- 3. Implement
- 4. Evaluate

You'll also find general considerations throughout the toolkit that you can modify for you or your organization's specific circumstances. Be sure to closely follow each step to prepare for planned and unplanned interruptions, transitions, or discontinued services. And don't forget to keep an eye out for RBT<sup>®</sup> and trainee supervision tips, sample documents, and resources along the way!



### Let's get started!

## 1: Assess

The first step in creating your new-and-improved continuity of services plan is to assess the processes currently in place. In other words, you should take a critical look at your current plan to see what can be improved in the areas of consistency, client protection, and compliance with relevant ethics codes. If you don't have a current plan, that's okay too. Follow these steps to develop one.

Here's one approach that you could take:

- 1. Make a list of what's missing from your current plan. This could be:
  - a. a service agreement
  - b. policies and procedures
  - c. task analyses, job aids, and checklists
- 2. Collect baseline data about how you and your team currently address planned and unplanned interruptions, transitions, and discontinuations of services. You can start by asking your team members the following questions. If you're practicing independently, answer these questions yourself:

Processes	Documents		
Are you aware of the required processes?	Are you aware of the required documents?		
Are you following the required processes?	Are you using the required documents?		
Do you feel comfortable following the required processes?	Do you feel comfortable using the required documents?		
What feedback do you have to improve the processes?	What feedback do you have to improve the documentation?		
If you don't have required processes in place, ask individual team members to describe what they do in different situations.	If you don't have required documents in place, ask individual team members to provide the documents that they use.		
Do you feel comfortable having conversations with stakeholders and clients about planned and unplanned interruptions, transitions, and discontinuations of services when necessary?			



Do you have ideas for improving these processes in your organization? Are you unsure of how to approach the topic with your supervisor or other decision makers? Because you all have your clients' best interests in mind, it's important to share barriers and potential areas of improvement that you have identified. However, remember that there may be things you are not aware of (e.g., funding requirements, organization policies).

Tips for moving forward:

- Gather your information (e.g., barriers you have identified, suggestions, data).
- Practice the conversation with a peer or mentor before you have it with your supervisor.
- Offer to assist with the next steps (e.g., collect baseline data, create resources, pilot processes).

#### RBT tips

Does your RBT training highlight the importance of providing sufficient notice when discontinuing services (e.g., resigning from their responsibilities as an RBT with you/your organization), including the potential negative impacts on clients when minimal notice is provided?

This is also a good time to make sure that you (and your team) are aware of the scope of your responsibility to protect your clients from the negative impacts of service interruptions. Consider an unfortunate unplanned event, such as a car accident or an RBT quitting without notice. Such an event may affect your ability to provide services, but it is still your responsibility to have policies and procedures in place that help you minimize and prevent harmful service interruptions.

#### **Considerations**

How comfortable are you and your team with having difficult conversations (e.g., discussing discontinuations of services, providing feedback to supervisors about current continuity of services policies)? Has your team been trained on this topic? Do you give them resources (e.g., books, podcasts)? Do they have opportunities to practice?

Consider creating a Treatment Integrity form for having these difficult conversations and set a criterion that BCBAs and BCaBAs must meet before they can have these conversations on their own.

#### Resources

- Check out this <u>infogram</u> for examples of steps to take when discontinuing or transitioning services.
- Review these recommendations as you assess your documents.
- Check out this sample <u>checklist</u> for assessing an existing plan.
- Take a look at these sample survey questions.
- Review the relevant <u>Code</u>.

In addition to asking these questions and recording the answers, the next time you or another BCBA® or BCaBA® on your team is managing an interruption, transition, or discontinuation of services, be sure to collect treatment-integrity data for following required processes and using existing documents.

Finally, you should present all of your collected data to the relevant leaders, supervisors, BCBAs, and BCaBAs at your organization. If

you are an independent practitioner, consider discussing these data with a peer or mentor to help finalize your plan.

# 2: Design

Now that you've taken a close look at your current processes, it's time to design a plan for updating and implementing your new processes.

Here are some steps that you could follow:

- Form a group of trusted individuals, such as other BCBAs, BCaBAs, and/or supervisors in your organization, who can help you manage, update, and/or create documents and processes. This group can also assist in testing the new documents and processes, and group members can even provide final approval if they have the authority. If you are an independent practitioner, consider asking a peer or mentor to review the documents and processes that you have created.
- 2. Notify the BCBAs and BCaBAs in your organization of the changes that will soon occur, if relevant.
- 3. Establish an ideal timeline and schedule dates and times for training as soon as possible.





#### Trainee supervision tips

Are all of these documents included in your training?



#### Sample documents

Check out these sample checklists!

- <u>Organizational</u> <u>Considerations for Service</u> <u>Discontinuation and</u> <u>Transition</u>
- Discontinuing All Behavior-Analytic Services
- Discontinuing Services and <u>Transitioning to a Different</u> <u>Behavior-Analytic Service</u> <u>Provider</u>
- <u>Transitioning to a Different</u> <u>BCaBA/BCBA Within an</u> <u>Organization</u>

- 4. Update and/or create documents, such as:
  - a. a service agreement
  - b. policies and procedures (e.g., for service interruptions; transitions within the organization; transitions to other organizations; discontinuations of services; reviewing discontinuation criteria with parents, caregivers, and legally authorized representatives)
  - c. training plans (e.g., for discussing emergency interruptions; discontinuations and/or transitions with parents, caregivers, and legally authorized representatives; barriers to behavior-change interventions; how and when to document steps)
  - d. a list of alternative local providers

## 3: Implement

The time has finally come to implement all of the changes and updates that you have been planning. It's possible that your new continuity of services plan will be quite different from your old plan, so prepare to answer questions, model your new processes, and offer practice opportunities and feedback.

Here's one pathway that you could take:

- Share the new and updated documents with everyone who will be using them in your organization. It may be a good idea to share these documents with your team members in advance so that you can gather feedback and make adjustments.
- 2. Provide training that you feel is necessary, such as:
  - a. an introduction to the new and updated documents
  - b. how to have discontinuation-criteria conversations with relevant stakeholders (e.g., parents, caregivers)
  - c. how to address behavior-change interventions

#### Considerations

Don't forget! Client documentation should always be up to date so that it can be transferred to another provider at any time.

- 3. Set a date when all new and updated internal policies and procedures will be implemented.
- 4. Set a date when all new and updated external policies and procedures will be shared with the appropriate stakeholders and clients.
- 5. Provide assistance to any clients who are preparing to transition or discontinue services.
- 6. If you are an independent practitioner, follow the previous steps on your own (e.g., set deadlines, implement processes). Consider asking a peer or mentor to continually check in and hold you accountable.

#### Trainee supervision tips

Consider inviting your trainees to observe relevant stakeholder and client meetings to review the new policies and procedures.

## 4: Evaluate

You've reached your final destination! Now that you've assessed your existing processes, designed a plan of action, and implemented your new-and-improved processes, it's time to evaluate the finished product. Be sure to remember that evaluation never ends. It's a continual process of quality improvement.

Here's one method that you could use:

- Collect important data, such as treatment-integrity data on compliance with new policies, procedures, and required documents.
- Survey relevant stakeholders, clients, BCBAs, and BCaBAs on the quality of the new processes, documents, and trainings.
- 3. Share your findings with the relevant leaders, supervisors, BCBAs, and BCaBAs at your organization. If you are an independent practitioner, review your own data.

#### Considerations

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Ensure that you and your team are in compliance with the <u>Ethics Code</u> for <u>Behavior Analysts</u> at all times. If not, provide feedback and trainings to the relevant team members as needed and don't forget to document it!



- Make changes based on the data collected and feedback from the surveys.
- 5. Continue to provide feedback and additional trainings as needed.
- 6. Rinse and repeat.

#### **RBT** tips

As a supervisor, it's your responsibility to make RBTs aware of the <u>RBT Ethics Code (2.0)</u>, your organization's policies and procedures, and the potential impacts on clients when RBTs discontinue services without providing sufficient notice. Consider including this information in the initial RBT 40-hour training and/or onboarding. It can't hurt to review this information more than once!

It's also important to make sure that your policies and procedures address instances in which an RBT abruptly discontinues services due to a physical or mentalhealth concern, a life event, or an emergency situation.

Don't forget that continuity of care is your responsibility. These policies and procedures exist to minimize negative impacts on affected consumers.



#### **Resources**

Check out the <u>Continuity</u> of <u>Services: Reminders for</u> <u>RBTs</u>! Share this resource with RBTs under your supervision to help them keep the most important aspects of service continuity in mind.

We hope that this toolkit has been a helpful resource for you—and that you feel confident to move forward with your new continuity of services plan. There's nothing better

for you or your clients than having a consistent, organized, ethicscompliant process for addressing service interruptions, transitions, or discontinuations.

Please share this resource with anyone who might find it helpful, including your behavior analyst friends and colleagues. We can't wait to see what you do!

# Resources



## Interruption, Transition, and Discontinuation of Services Tips

Any policies, procedures, and sample contractual language provided in this document are meant to serve solely as examples that comply with the Behavior Analyst Certification Board's (BACB<sup>®</sup>) ethics requirements. Nothing in this document shall be construed as legal advice and enforceability is not guaranteed or warranted. Specific policies, procedures, and contractual language should be drafted by professionals familiar with local and state laws and requirements.

#### Purpose

This ethics resource is intended to supplement the ethics codes and provides various resources related to transitioning and discharging services.

### Supplemental Considerations to Prevent Interruption and Discontinuation of Services

**Before Providing Services** 

- **Staff training.** Discontinuation criteria should be discussed with clients at intake, throughout services, and when it is determined that the client has met the discontinuation criteria. As a supervisor, you should practice having this discussion with your supervisees and observe them practicing having the discussion until they demonstrate competence. If you are not a supervisor, contact your supervisor or colleagues to practice having the discussion before it is needed.
- **Service agreement.** The service agreement should clearly specify the agreed-upon service conditions (e.g., conditions for discontinuing services, conditions when services might be interrupted, back-up provider information, minimum transition period). Make sure that the policy service agreement is compliant with the relevant requirements in the ethics codes.
- **Interruption of services policy and procedure.** Develop a policy and procedure for interruption of services. This policy should include information on how to remediate situations when services might be interrupted (e.g., emergencies, payment interruptions, unexpected decreases in staff availability).
- Service discontinuation and transition policy and procedure. Develop a policy and procedure for service transitions. The policy should include information to promote service transitions (e.g., criteria for transitioning or discontinuing services, transition timelines, process for documentation distribution, viable transition options). The procedure should outline the specific steps involved. Make sure that the policy is compliant with the relevant requirements in the ethics codes.
- **Client meeting.** The service contract and relevant policies (e.g., service discontinuation and transition policy and interruption of services policy) should be reviewed prior to the start of services with clients. Document that the policies were reviewed with the clients.

While Providing Services and Discussing Service Needs

- **Update documentation.** In a situation where there is an unexpected service interruption or discontinuation, ensure that all client documentation (e.g., graphs, data, assessments, behavior plans) is up to date.
- Emergency plan. The emergency plan should specify what will be done to prevent or minimize disruption of services (e.g., temporary BCaBA/BCBA supervision, transitioning to teleservices, temporary reduction in services, process for sending current client information to new providers) during emergencies. Emergency plans should be individualized for the specific client and situation when implemented.
- **Client meetings.** In collaboration with the clients, review client progress to evaluate whether a reduction or discontinuation of services would be warranted. Review discontinuation criteria at least every six months. Document all meetings.

When Providing Pre-Termination Services

- **Transition services.** Provide transition services regardless of the circumstances. A proper service transition is required regardless of who terminates the services.
- **Notice.** If services are going to be terminated, provide a reasonable timeline for transitioning services. The timeline should be based upon the client's needs and in line with the service contract/organizational policies. In a typical case, the behavior analyst provides at least 30 days' notice.
- Alternative provider(s). Provide a list of available and qualified providers (e.g., those that can provide services, those that are geographically close to client) who can continue services for the client.
- **Communication.** Keep the client and relevant stakeholders informed about what to expect during the transition and important timelines. If needed, develop a formal transition plan in collaboration with the client and document the client's collaboration and consent.
- **Continue services.** Continually monitor and evaluate progress as part of ongoing service provision to determine whether any appropriate service reduction, discontinuation, or transition is warranted.
- **Consultation.** Provide consultation to the subsequent service provider if needed. Facilitate any necessary training of new staff (e.g., provide training on existing skill acquisition or behavior-reduction programs) and ensure an appropriate handover with the next behavior analyst and/or applicable professional.
- **Documentation.** Keep a copy of all documents (i.e., graphs, data, assessments, treatment plans) and, upon consent and request from the client (or relevant stakeholder), immediately provide a copy to the client and to the subsequent service provider.
- **Third-party payers.** If interruptions to services, a service transition, or discontinuation of services occurs, identify who will notify the appropriate payers and agencies of service changes.

#### **Troubleshooting Guidance**

Barriers to Behavior-Change Programs (e.g., safety)

- **Prerequisites.** Identify prerequisites for service delivery. Clearly describe the necessary environmental conditions in the contract and/or behavior plans.
- **Barriers.** Problem solve ways to provide services (e.g., provide services outside of the home, using telehealth) and discuss them with the client. Document the barriers and attempted solutions to the intervention barriers including any supporting data.
- **Emergency plan.** Have an emergency plan in place and provide it to key stakeholders in the case that services are discontinued or interrupted.

**Unexpected Interruptions in Pay** 

- **Contract.** Review organizational policies and the service contract for agreed upon terms in the event of a non-payment of fees.
- **Problem solve.** Collaborate with the client or supervisee to develop other feasible options for payment (e.g., private pay, payment extended over longer period of time) or services (e.g., shorter sessions, less frequent sessions, homework between sessions).
- **Refer.** If you cannot agree on a fee, refer the client to another provider or agency that might be willing to provide services at a reduced fee or with other payment options.
- **BACB requirements.** The BACB does not require behavior analysts to provide services to clients who have not paid fees owed. However, the BACB does require proper transition of those clients. In the case of a client with limited financial abilities, a longer transition may be necessary to find an alternative service provider.

Alternative Providers Are Not Available

- **Be Creative.** Collaborate with the client and stakeholders to identify other options to continue services (e.g., split services with other providers, provide services via telehealth).
- **Continue services.** Based upon the client's needs, it might be necessary to continue services until another service provider is available.
- **Emergency plan.** If services are reduced or discontinued, provide an emergency plan that covers information to keep the client safe.
- **Document steps.** Keep a record of all of the steps taken to ensure that the client continues to receive services.

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**Client Declines Other Providers** 

- Alternative providers. Review the services, geographic location, and credentials of those providing alternative services to ensure that they are able to provide quality services to the client.
- **Problem solve.** Collaborate with the client and relevant stakeholders to develop solutions to address any concerns (e.g., consider continuing services until another provider is available, provide supports to the subsequent provider).
- **Document steps.** Keep a record of all of the steps taken to ensure that the client continues to receive services.

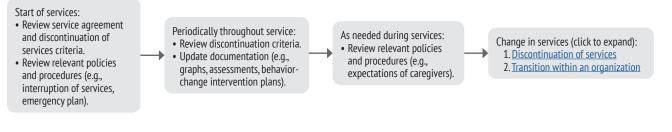
#### **Additional References**

Behavior Analyst Certification Board. (2014, November). Setting the record straight about questionable business practices. *BACB Newsletter*.

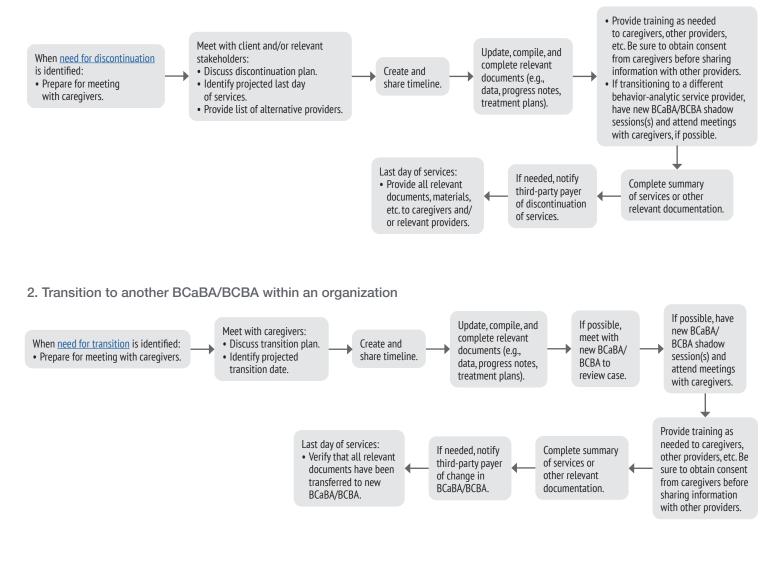
## Timeline for Discontinuing or Transitioning Services

Check out this sample timeline with steps that you may need to take when discontinuing or transitioning services for a client. Use the links to reveal more information.

#### Parent timeline



1. Discontinuation of behavior-analytic services or transition to another behavior-analytic service provider



# Checklists

The following documents can be modified and used by you and your organization. Learn how to <u>extract pages</u> from a PDF.

### Checklist Organizational Considerations for Service Discontinuation and Transition

Use this checklist to review and develop necessary documents, policies, and procedures related to client service discontinuations, transitions, and any associated training needs.

Action	Date Completed	Initials
Policy and procedure for reviewing the service agreement and relevant policies and procedures with clients before starting services. Include a process for documenting that the review occurred		
Procedures and materials for both the discontinuation and transition processes (e.g., checklists)		
Service agreement contract that includes specific discontinuation of services criteria		
Interruption of services policy and procedure (that outlines the procedures for addressing unplanned interruptions)		
<ul> <li>Service transition policy and procedure to include:</li> <li>providing appropriate notice</li> <li>maintaining clear communication</li> <li>continuing services, as appropriate</li> <li>providing consultation for the next provider, if possible and needed</li> <li>providing documentation in a timely manner</li> <li>notifying third-party payers of services change</li> </ul>		
Consent forms to release/share information		
Process for documentation tracking and upkeep (e.g., data, assessments, progress notes)		
Policy and procedure for sharing the interruption of services policy and procedure with clients		
Policy and procedure for continual review of the service needs and contract with clients		
Policy and procedure for documenting meetings		
Discontinuation or transition summary/report		
Current list of other local providers and procedure for regularly updating		
Staff training on how to discuss discontinuation criteria and transition of services at intake and critical points throughout services		

### Checklist Discontinuing All Behavior-Analytic Services

Note: The responsible party in all cases is the designated BCBA or BCaBA.

Action	Timeline of Completion	 ite Dieted	Initials
<ul> <li>Meet with client and/or relevant stakeholders to discuss:</li> <li>1. reasons for discontinuation (e.g., mastery of all treatment goals, does not demonstrate progress toward goals for successive authorization periods)</li> <li>2. remaining goals</li> <li>3. plans for stakeholder/provider training</li> <li>4. other concerns identified by caregiver</li> </ul>	Based on the needs of the specific client		
Create timeline for discontinuation of services with assigned roles (e.g., completion of discontinuation summary, data update) during clearly delineated discontinuation process	Based on the needs of the specific client		
Share timeline with all relevant parties (e.g., supervisor, relevant stakeholders)	Based on the needs of the specific client		
Verify that all documents, graphs, data etc. are up to date and provide to client and/or relevant stakeholder at the end of services	Throughout services and finalized at the end of services		
Document all meetings	Throughout services		
Complete summary of services and provide to client and/or relevant stakeholder	At end of services		
Notify third-party payer of service change	At end of services	N/A	

### Checklist Discontinuing Services and Transitioning to a Different Behavior-Analytic Service Provider

Note: The responsible party in all cases is the designated BCBA or BCaBA.

Action	Timeline of Completion	Date Completed	Initials
<ul> <li>Meet with client and/or relevant stakeholders to discuss:</li> <li>1. reasons for discontinuation (e.g., unreconcilable differences, family request for discontinuation)</li> <li>2. remaining goals</li> <li>3. plans for stakeholder/provider training</li> <li>4. last day of services</li> </ul>	Based on the needs of the specific client		
Provide list of alternative providers	Based on the needs of the specific client		
Create timeline for discontinuation with assigned roles (e.g., completion of discontinuation summary, data update, etc.) during clearly delineated discontinuation process	Based on the needs of the specific client		
Share timeline with all relevant parties (e.g., supervisor, relevant stakeholders)	Based on the needs of the specific client		
Verify that all documents, graphs, data, etc. are up to date and provide to client and/or relevant stakeholders at discontinuation	Throughout services and finalized at the end of services		
Document all meetings	Throughout services		
Request consent to share information with next behavior- analytic service provider	Based on the needs of the specific client	N/A	
If client and/or relevant stakeholders provide consent, set up meeting with new behavior-analytic service provider for handover, consultation, etc.	After consent is obtained		
Complete summary of services and provide to client, relevant stakeholders, and/or next BCaBA/BCBA	At end of services		
Notify third-party payer of service change	At end of services	N/A	

### Checklist Transitioning to a Different BCaBA/ BCBA Within an Organization

Note: The responsible party in all cases is the designated BCBA or BCaBA.

Action	Timeline of Completion	Date Completed	Initials
Meet with client and/or relevant stakeholders to discuss: 1. transition to new BCaBA/BCBA 2. plans for transition 3. date of transition	Based on the needs of the specific client		
Create timeline for transition with assigned roles (e.g., completion of transition summary, data update) during clearly delineated transition process	Based on the needs of the specific client		
Share timeline with all relevant parties (e.g., supervisor, relevant stakeholders)	Based on the needs of the specific client		
Verify documents, graphs, data, etc. are up to date and provide to caregiver at discontinuation	Throughout services and finalized at the end of services		
Document all meetings	Throughout services		
Prepare and compile all relevant documents (e.g., assessments, programs, treatment plans, graphs, relevant meeting notes)	Based on the needs of the specific client		
If possible, meet with new BCaBA/BCBA to discuss current intervention(s), plans for transition, and any other relevant information	Based on the needs of the specific client	N/A	
If possible, meet with client and/or relevant stakeholders to introduce new BCaBA/BCBA	Based on the needs of the specific client	N/A	
If possible, have new BCaBA/BCBA observe session with client	Based on the needs of the specific client	N/A	
Complete transfer summary and provide to new BCaBA/BCBA	At transfer		
Notify third-party payer of service change	At transfer	N/A	