

Behavior Analysis

- iBudget Handbook -

Behavior Analysis services are provided to assist individuals to learn new, or increase existing, functionally equivalent replacement skills directly related to existing challenging behaviors.

Behavior Analysis includes the design, implementation, and evaluation of systematic environmental modifications that assist in understanding a person's behavior and to produce significant change in behavior that is socially meaningful.

Training for parents, caregivers, and staff is integral to the implementation of a Behavior Analysis services plan, as is the monitoring of procedural integrity and program effectiveness.

Delivery of Behavior Analysis services is a complex process that includes assessing, planning, and training directly with the individuals as well as with others supporting the person.

Service Specific Record Review – Behavior Analysis

#	Performance Measure/Standard	Protocol	Not Met Reasons
1	<p>The provider has complete Service Logs covering services provided and billed during the period under review.</p>	<p>iBudget Handbook COMPLIANCE</p> <p>Review Service Logs for the entire period of review.</p> <ul style="list-style-type: none"> • Determine that Service Logs include all required components: <ul style="list-style-type: none"> ○ Name of person receiving services ○ Name of person providing the service ○ Name of the service ○ Date of service ○ Time in/out ○ Summary or list of services provided ○ Any follow up needed for the person’s health and safety when applicable <p>Review Service Logs against claims data to ensure accuracy in billing.</p> <ul style="list-style-type: none"> • Compare each date of service in claims to documented date of service on each Service Log in the period of review. • Compare units paid in claims to documented units on each Service Log. • Claims may indicate the provider billed by combining documented units covering a few days, a week or more into one billable unit billed on the last date in the service period. There will not be a 1:1 service date to claims date relationship. In these instances, the single billed unit must match total documented units since the last billing date. <p style="text-align: center;">This standard is subject to identification of a potential billing discrepancy</p>	<ol style="list-style-type: none"> 1) Service Log was not present for the date of service for which the claim was submitted. (B) 2) Service Log did not include the name of the person receiving services. (B) 3) Service Log did not include a time in/out. (B) 4) Service Log did not include the date service was rendered. (B) 5) Service Log did not include a summary or list of the service provided. (B) 6) Discrepancies were noted between units billed and units documented. (B)

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2	A copy of the most recent Behavior Assessment is in the record.	<p>iBudget Handbook COMPLIANCE</p> <p>Note: Score this standard N/A if original Behavior Assessment was not authorized and completed within the 12-month period of review by this provider.</p> <p>Review the record for the most recent Behavioral Assessment.</p> <ul style="list-style-type: none"> • Review documentation and Service Authorizations for evidence a Behavior Assessment was requested/approved during the period of review. • The Behavior Assessment is separate from the Behavior Analysis Service Plan. <p style="text-align: center;">This standard is subject to identification of a potential billing discrepancy</p>	1) Most recent Behavior Assessment was not in the record for review. (B)
3	The Behavior Assessment report was completed within the required timeframes.	<p>iBudget Handbook Rule 65G-4 F.A.C COMPLIANCE</p> <p>Note: Score this standard N/A if Behavior Assessment was not authorized and completed within the 12-month period of review by this provider.</p> <p>Review the record for the most recent Behavior Assessment.</p> <ul style="list-style-type: none"> • Determine date the Behavior Assessment was completed. • Compare date completed to the date service began. • Determine if the Behavior Assessment was completed within 30 days of initially providing service. 	<p>1) Behavior Assessment was not completed within 30 days of initially providing service. (B)</p> <p>2) Unable to determine due to undocumented completion date. (B)</p>

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		This standard is subject to identification of a potential billing discrepancy	
4	The current Behavior Analysis Service Plan contains minimum required components for billing.	<p>iBudget Handbook Rule 65G-4 F.A.C. COMPLIANCE</p> <p>Review the record to locate the current Behavior Analysis Service Plan (BASP).</p> <ul style="list-style-type: none"> • Look for the date on plan indicating date written or updated. <ul style="list-style-type: none"> ▪ Dates indicated on LRC Behavior Plan review/approvals and Assistant approvals when applicable can assist with this determination. • The Behavior Analysis Service Plan shall include, either in text <u>or</u> by reference to appropriate documents: <ul style="list-style-type: none"> ▪ Identifying information for the person affected by the plan. ▪ Data collection methods for behaviors targeted for reduction and replacement behavior. ▪ Intervention procedures for behaviors targeted for reduction and replacement behavior. <p>When Behavior Assistants are identified as implementers in the current Behavior Analysis Service Plan</p> <ul style="list-style-type: none"> • The Behavior Analysis Service Plan shall include, either in text or by reference to appropriate documents: <ul style="list-style-type: none"> ○ The rationale for use of these services. ○ Outline of the Behavior Assistant’s routine and/or duties. 	<ol style="list-style-type: none"> 1) Record did not contain a current Behavior Analysis Service Plan. (B) 2) Behavior Analysis Service Plan did not include identifying information for the person affected by the plan. (B) 3) Behavior Analysis Service Plan did not include intervention procedures for behaviors targeted for reduction. (B) 4) Behavior Analysis Service Plan did not include intervention procedures to be used for replacement behavior. (B) 5) Behavior Analysis Service Plan did not include data collection methods for behaviors targeted for reduction and replacement behavior. (B) 6) Behavior Analysis Service Plan did not include rationale for use of Behavior Assistant services. (B) 7) Behavior Analysis Service Plan did not include an outline of the Behavior Assistant’s routine and/or duties. (B)

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5	The initial Behavior Analysis Service Plan was developed within the required timeframe.	<p>iBudget Handbook COMPLIANCE</p> <p>This standard applies only to initial Behavior Analysis Service Plans developed and implemented within the previous 12 months.</p> <p>If the initial Behavior Analysis Service Plan was first developed and implemented more than 12 months ago, score this standard N/A.</p> <ul style="list-style-type: none"> • Review the record to locate the initial Behavior Analysis Service Plan. • Determine if the Behavior Analysis Service Plan was developed within 90 days of initially providing service. • Refer to Service Logs and/or claims data. <p style="text-align: center;">This standard is subject to identification of a potential billing discrepancy</p>	<ol style="list-style-type: none"> 1) Initial Behavior Analysis Service Plan was not in the record. (B) 2) Initial Behavior Analysis Service Plan was not completed within 90 days of initially providing services. (B) 3) Unable to determine due to lack of documented development date. (B)
6	All written plans describing Behavior Analysis services consistent with subsection 65G-4.009(10), F.A.C., are submitted to the LRC Chairperson within 5 working days following implementation.	<p>iBudget Handbook Rule 65G-4 F.A.C., Model LRC [Bylaws] Form APD-CBA – 1 (10/10) COMPLIANCE</p> <p>This standard applies only to initial Behavior Analysis Service Plans developed and submitted to the LRC within the period of review.</p>	<ol style="list-style-type: none"> 1) Provider documentation demonstrated Behavior Analysis Service Plan met criteria for submission to the LRC, but was not submitted. 2) Provider documentation demonstrated Behavior Analysis Service Plan was submitted to the LRC, but not within 5 working days following implementation.

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		<ul style="list-style-type: none"> - If the BASP was initially developed outside the period of review, score N/A. - If the BASP does not require LRC review, score N/A - If the Behavior Analysis Service Plan is not in the record, score N/A. <p>BASP is required to be submitted to the LRC Chairperson or designee within five working days following implementation. Review provider documentation to determine:</p> <ul style="list-style-type: none"> ▪ The date the BASP was first implemented ▪ The date the BASP was submitted to the LRC Chairperson or designee 	3) Unable to determine due to lack of documented submission date.
7	The provider presents data to the LRC, or if major revisions have been made, the Behavior Analysis Service Plan to the LRC prior to the established review date.	<p>iBudget Handbook Rule 65G-4 F.A.C. COMPLIANCE</p> <p>If the BASP does not require LRC review, score N/A</p> <p>This standard applies to reviews of behavioral data resulting from BASP implementation of or when major revisions have been made to the BASP. Periodic and reoccurring data reviews may be scheduled by the LRC Chairperson or their designee with signature on the Behavior Analysis Services Plan (BASP) Review and Approval form.</p> <ul style="list-style-type: none"> - The decision on the above form will typically be “Continue as Is,” but could be “Other” with comments. - “Other” will be selected if the provider is instructed to “Stop” the program or make modifications. - If the BASP does not require LRC review, score N/A 	<ol style="list-style-type: none"> 1) Behavior Analysis Service Plan was not in the record. 2) Provider documentation did not include an LRC schedule for data review. 3) Provider documentation demonstrated the provider did not submit the Behavior Analysis Service Plan in advance of the annual review date (365 days from the last LRC approval date). 4) Provider documentation demonstrated the provider did not present behavioral data within 365 days as required from the original LRC approval date. 5) Revisions made to the plan were not submitted to the LRC Chair/designee for review within 7 days following the changes. 6) Provider documentation demonstrated the provider did not submit the Behavior Analysis

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		<p>Review the current BASP and associated documentation to determine the following:</p> <ul style="list-style-type: none"> • The LRC Chair or designee has approved the BASP. <ul style="list-style-type: none"> ○ The Field Office ABAs should be using the “Behavior Analysis Services Plan (BASP) Review and Approval” form. ○ The signed form should indicate one of 5 decisions: <ul style="list-style-type: none"> ▪ To “approve”, and a review date established; or ▪ To “approve with modifications” and a review date established; or ▪ To “not approve” - Plans not approved must be revised and resubmitted within 14 working days; or ▪ To “Continue as Is;” or ▪ “Other” may be indicated if the provider is instructed to “Stop” the program or make modifications. <p>Plans are to be submitted for review no later than 365 days from the last annual LRC approval date. Ongoing data review frequency is to be identified by the LRC Chairperson or designee.</p> <ul style="list-style-type: none"> • Determine Review schedule was followed. • Determine there were no lapses in LRC Chair/designee review dates during the period of review. • If outcome was “approve with modifications” determine provider submitted revisions to the chairperson within 30 days of review • If outcome was “not approve”, determine provider revised and resubmitted within 14 working days. 	<p>Service Plan prior to the LRC established review date.</p> <p>7) Behavior Analysis Service Plan was submitted timely but has not been reviewed by the LRC. *****Not Met but not calculated into score</p>

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		<ul style="list-style-type: none"> If any revisions to the BASP were made at any other time determine provider submitted revisions within one week after the changes. 	
8	The Behavior Analysis Service Plan is being implemented as written and approved.	<p>iBudget Handbook Rule 65G-4 F.A.C COMPLIANCE</p> <p>If the Behavior Analysis Service Plan is not in the record, score this standard N/A.</p> <ul style="list-style-type: none"> Compare Behavior Analysis Service Plan details to provider's documentation of services. Determine if documentation (Service Logs, Quarterly Summaries, data displays, plan updates, monitoring tools) demonstrates: <ul style="list-style-type: none"> Service is implemented in all relevant settings. All behaviors targeted for reduction and replacement behavior are being addressed Identified intervention procedures are being utilized Data are being collected as indicated Identified monitoring schedule is being followed 	<ol style="list-style-type: none"> Provider documentation demonstrated the Behavior Analysis Service Plan was not being monitored by the Behavior Analyst per the monitoring schedule. Provider documentation demonstrated provider did not implement recommended changes to the Behavior Analysis Services Plan per LRC instructions. Provider documentation demonstrated provider continued to implement the Behavior Analysis Service Plan after the LRC denied approval.
9	A Quarterly Summary covering services provided and billed during the period under review is in the record.	<p>iBudget Handbook COMPLIANCE</p> <p>The quarterly time period begins on the effective date of the Support Plan.</p> <p>Determine Support Plan effective date to determine Quarterly Summary timeframes.</p>	<ol style="list-style-type: none"> One or more Quarterly/Monthly Summaries were not in the record. One or more Quarterly/Monthly Summaries did not include a summary of program monitoring and relevant factors affecting behavior. One or more Quarterly/Monthly Summaries did not include an objective summary of results or graphs.

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#	Performance Measure/Standard	Protocol	Not Met Reasons
		<ul style="list-style-type: none"> • Determine if provider completes monthly or Quarterly Summaries. <ul style="list-style-type: none"> ▪ Monthly Summaries in lieu of Quarterly Summaries are acceptable. • Review each Quarterly (Monthly) Summary within the period of review to determine minimum content is included: <ul style="list-style-type: none"> ▪ A summary of program monitoring and relevant factors affecting behavior. ▪ Objective summary of results or graphs ▪ Analysis of data and summary of progress, identifying whether each target behavior has improved or not since the last quarter and since baseline ▪ Recommendations, if any. <p>If the provider was not providing services at the time the last Quarterly Summary was due, score N/A.</p>	<p>4) One or more Quarterly/Monthly Summaries did not include analysis of data and summary of progress identifying whether or not each target behavior has improved since last quarter and baseline.</p> <p>5) One or more Quarterly/Monthly Summaries were not reflective of progress toward all relevant Support Plan goals/outcomes.</p> <p>6) One or more Quarterly Summaries were not aligned with the Support Plan effective date.</p>
10	The Annual Report covering services provided and billed during the period under review is in the record.	<p>iBudget Handbook COMPLIANCE</p> <p>Review record to determine if there is an Annual Report present covering the entire period of review (this may require review of 2 Annual Reports).</p> <p>Review record to determine Support Plan effective date.</p> <ul style="list-style-type: none"> • Determine if the Annual Report is a component of the Third Quarterly Summary, Ninth Monthly Summary (for those completing Monthly Summaries) or a separate document (which is acceptable). 	<p>1) Annual Report was not in the record. (B)</p> <p>2) Annual Report was completed, but not at least 60 days prior to the Support Plan effective date. (B)</p> <p>3) Annual Report did not indicate a date of completion. (B)</p>

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#	Performance Measure/Standard	Protocol	Not Met Reasons
		<ul style="list-style-type: none"> ○ The Third Quarterly Summary or Ninth Monthly Summary may serve as the Annual Report when a summary of the previous three quarters (or nine months) is included. ● Determine date Annual Report was completed and provided to the Support Coordinator. <ul style="list-style-type: none"> ○ Annual Report must be completed and provided to the Support Coordinator at least 60 days prior to the Support Plan effective date. <p>If the provider rendered services to the person for less than 12 months, the Annual Report would cover all months since services were initiated.</p> <p>If the provider was not providing services to the person at the time the last Annual Report was due, score as N/A.</p> <p style="text-align: center;">This standard is subject to identification of a potential billing discrepancy</p>	
11	The Annual Report covering services provided and billed during the period under review contains all required components.	iBudget Handbook COMPLIANCE Review record to determine Support Plan effective date. <ul style="list-style-type: none"> ● Determine if the Annual Report is a component of the Third Quarterly Summary, Ninth Monthly Summary (for those completing Monthly Summaries) or a separate document (which is acceptable). <ul style="list-style-type: none"> ○ The Third Quarterly Summary or Ninth Monthly Summary may serve as the Annual Report when a summary of the previous three quarters (or nine months) is included. 	<ol style="list-style-type: none"> 1) Current Annual Report was not in the record. 2) Current Annual Report did not include a summary of the previous three quarters (or nine months) of the Support Plan year. 3) Current Annual Report did not include a summary of program fidelity monitoring. 4) Current annual report did not include a summary or any relevant environmental or medical factors affecting behavior. 5) Current Annual Report did not include a graphic summary of one or more target behaviors identified in the BASP.

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#	Performance Measure/Standard	Protocol	Not Met Reasons
		<ul style="list-style-type: none"> • Review Annual Report for a summary of the first three quarters (or nine months) of the support plan year which must include: <ul style="list-style-type: none"> – A summary of program fidelity monitoring and any relevant environmental or medical factors affecting behavior. – Graphic and narrative summary of all target behaviors identified in the behavior analysis services plan (BASP). – Analysis of data and summary of progress, identifying whether each target behavior has improved or not since the last quarter and since baseline. – Recommendations for the coming year, including a plan of fading based upon behavioral criteria or changes to the current plan or other supports and services, if any. <p>If provider has rendered services to the person for less than 12 months, the Annual Report would cover all months since services were initiated.</p> <p>If the provider was not providing services to the person at the time the last Annual Report was due, score as N/A.</p>	<p>6) Current Annual Report did not include a narrative summary of one or more target behaviors identified in the Behavior Analysis Service Plan.</p> <p>7) Current Annual Report did not include analysis of data and summary of progress since last quarter (month) and baseline on one or more target behaviors identifying whether each target behavior has improved or not since the last quarter and since baseline.</p> <p>8) Current Annual Report did not include recommendations for the coming year, including plan for fading based upon behavioral criteria or changes to the current plan or other supports and services, if any.</p>
12	The provider maintains accurate Service Authorizations covering services provided and billed during the period under review.	<p>iBudget Handbook Current APD Rate Table COMPLIANCE</p> <p>Service Authorizations are provided annually or more frequently as changes dictate.</p>	<p>1) Service Authorizations were not present in the record.</p> <p>2) One or more Service Authorizations were not present in the record.</p> <p>3) One or more Service Authorizations were not in approved status.</p>

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#	Performance Measure/Standard	Protocol	Not Met Reasons
		<ul style="list-style-type: none"> • Review the Service Authorizations for Behavior Analysis and ensure: <ul style="list-style-type: none"> ○ The Service Authorizations are available to cover all services provided and billed during the period under review; ○ The Service Authorizations are in approved status; ○ The Service Authorizations indicate the correct rate (e.g. Levels 1, 2, 3, agency, solo, geographic, non-geographic, Monroe County rate). <ul style="list-style-type: none"> ❖ Refer to the current APD Provider rate table as needed. <p>WSCs <u>and</u> service providers must verify the Service Authorizations are correct based on the amount, duration, frequency, intensity and scope authorized for the service in the iBudget system. If corrections are needed the service provider should immediately contact the WSC for resolution.</p> <ul style="list-style-type: none"> – Consider provider’s documented due diligence in securing corrected Service Authorizations when incorrect Service Authorizations are received or updates are in process. 	<p>4) One or more Service Authorizations did not indicate the correct rate.</p>
13	<p>The provider is in compliance with billing procedures and the Medicaid Waiver Services Agreement.</p>	<p>iBudget Handbook COMPLIANCE</p> <p>Determine if services are being provided in accordance with the Handbook.</p> <p>Provider bills the appropriate rate:</p> <ul style="list-style-type: none"> • Solo vs. Agency 	<p>1) Provider documentation demonstrated provider is a solo but billed the agency rate. (B)</p> <p>2) Provider documentation demonstrated the provider is not considered an agency for rate purposes but billed the agency rate. (B)</p>

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#	Performance Measure/Standard	Protocol	Not Met Reasons
		<ul style="list-style-type: none"> • Geographic, non-geographic, Monroe County • An agency or group provider for rate purposes is a provider that has two or more employees to carry out the enrolled service(s). A provider that hires only subcontractors to perform waiver services is not considered an agency provider for rate purposes. <ul style="list-style-type: none"> ○ Determine if provider had at least two employees to carry out the enrolled service(s) during the period of review. <p>Determine if payroll tax is withheld from employees' wages by their employer.</p> <p>Review provider payroll to confirm withholding of the following taxes:</p> <ul style="list-style-type: none"> • Federal income tax withholding • The employee's portion of Medicare tax and employee's portion of Social Security tax (FICA) • Employer's Federal Unemployment Tax Act (FUTA) <p>Review Claims data to determine rate billed</p> <ul style="list-style-type: none"> ❖ Refer to the current APD Provider rate table as needed. <ul style="list-style-type: none"> • Review provider records for Service Authorizations. • Review data collection documentation and Service Logs for information that supports frequency and location of service provision. (Days per week/month, Q/H per day/week, etc.) • If service authorizations are not present for some or all of the period under review other documentation such as 	<p>3) Provider documentation demonstrated provider billed the geographic rate for services rendered in a non-geographic area. (B)</p> <p>4) Provider documentation demonstrated provider billed the Monroe County rate for services not rendered in Monroe County. (B)</p> <p>5) Provider documentation demonstrated services were provided in the school system. (B)</p> <p>6) Provider documentation demonstrated services were rendered in place of services required under provisions of the Individuals with Disabilities Education Act (IDEA). (B)</p> <p>7) Provider documentation demonstrated provided billed and was paid for more than one behavior assessment during a 12-month period.</p> <p>8) Service is not being rendered in accordance with the Handbook. (B)</p>

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#	Performance Measure/Standard	Protocol	Not Met Reasons
		<p>Service Logs, Behavior Plans, Support Plans, etc. can be used.</p> <p>Behavior Analysis services are not to be provided in the school system or take the place of services required under provisions of the Individuals with Disabilities Education Act (IDEA).</p> <ul style="list-style-type: none"> ○ Exception – attending meetings <p>Behavior Analysis can be billed for time spent engaged in the following indirect activities: daily progress notes documenting the activities, data collection, and analysis, behavior plan development and revision, graphing and analysis of data, providing consultation to other professionals, presentation of a recipient’s behavior plan to the APD LRC, and attending meetings relevant to the recipient’s treatment, including the recipient's treatment team, psychiatrist, and school related meetings.</p> <p>Providers can only bill for indirect services up to a maximum of 25% of the total units for the cost plan year</p> <p>If service is routinely rendered at a frequency less than or more than the Service Authorization, score as Met and add a discovery.</p> <p style="text-align: center;">This standard is subject to identification of a potential billing discrepancy</p>	
14	Provider Bills for services only after service is rendered.	iBudget Handbook COMPLIANCE	1) Provider documentation demonstrated the provider billed for services prior to rendering

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#	Performance Measure/Standard	Protocol	Not Met Reasons
		Provider is not to bill for services prior to rendering. <ul style="list-style-type: none"> • Review Claims data for date billed. • Review dates on Service Logs. • Compare date of service on Service Logs to “claim billed date” in claims. • Determine if services were rendered prior to billing for each date of service during the period of review. 	on one or more dates during the period under review.
15	Services are not billed in excess of 16 units (quarter hours) of service per day.	iBudget Handbook COMPLIANCE <ul style="list-style-type: none"> • Review claims data for dates of service billed in excess of 16 quarter hours. • Review total documented units on each Service Logs for the entire period of review to determine if documented units exceeded 16 quarter hours (4 hrs) on any date. • Refer back to protocol on #1 if necessary if the provider combines several service dates into one billing cycle. <p style="text-align: center;">This standard is subject to identification of a potential billing discrepancy</p>	1) Provider documentation demonstrated services were billed in excess of 16 units on the date of service for which the claim was submitted. (B)
16	Monthly updates to graphic displays of acquisition and reduction behaviors are in the record for each month of the period of review.	iBudget Handbook Rule 65G-4 F.A.C. COMPLIANCE <p>The provider shall take reasonable steps to ensure data collection for behaviors targeted for increase and decrease during the entire period services are in effect.</p> <ul style="list-style-type: none"> ○ Graphic displays of at least weekly data for behaviors targeted for change shall be updated and maintained in the record. 	1) One or more monthly updates to graphic displays of acquisition and reduction behaviors were not in the record.

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		<ul style="list-style-type: none"> • Review record for graphic data displays for each month in the review period. • Determine if graphic displays of acquisition and reduction behaviors are updated at least monthly. • Monthly graphs should include weekly data points for each behavior being graphed. • Graphed data points may be less frequent (i.e. biweekly, monthly) upon agreement from the LRC Chairperson, when frequency of behavior is exceptionally low. • Refer to applicable Behavior Analysis Service Plan and the LRC Review and Approval form to determine identified data collection method. <ul style="list-style-type: none"> ○ Do not score as Not Met if updates are unable to be completed each month due to periodic data collection problems outside of the Analyst’s control. Look for due diligence in resolving data collection barriers. <p>Note: If provider switched to completing Quarterly summaries, Graphic Display Data must continue to be updated at least Monthly.</p>	
17	Training for parents, caregivers and staff on the Behavior Analysis Service Plan is documented.	iBudget Handbook Rule 65G-4 F.A.C. COMPLIANCE Review the current Behavior Analysis Services Plan <ul style="list-style-type: none"> • Ask the provider to explain the method of documenting this training. 	1) Provider documentation did not demonstrate training for parents/other caregivers identified as integral to the Behavior Analysis Service Plan. 2) Provider documentation did not demonstrate training for direct support staff identified as integral to the Behavior Analysis Service Plan.

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		<ul style="list-style-type: none"> • Determine who is currently working with the person: direct support staff, family, other caregivers • Refer to the section of the BASP that includes “Description of performance-based training for persons implementing procedures”. • Review provider documentation to determine if individuals identified have been trained on the Behavior Analysis Service Plan. <p>Note: This standard pertains only to people integral to the plan – the people who see the person. If the person lives at home with parents, it will include parents. If in a group home or day program, it will include residential and/or day program staff. If the person goes home on visits, it would include the family and the group home. Plan should indicate who should be trained and in what setting programs are implemented.</p>	<p>3) Provider documentation demonstrated training for some, but not all direct support staff identified as integral to the Behavior Analysis Service Plan.</p> <p>4) Provider documentation demonstrated training for some, but not all parents/other caregivers identified as integral to the Behavior Analysis Service Plan.</p>