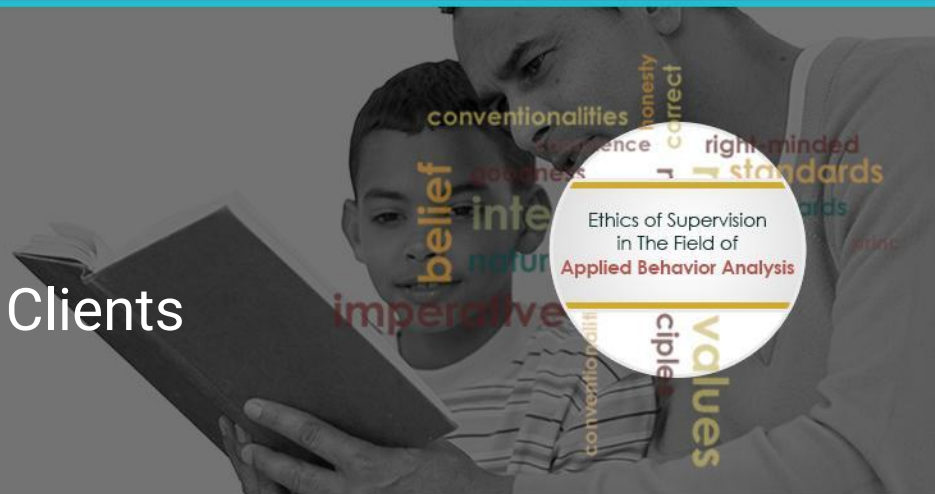


Welcome To Special Learning's

Ethics Code Deep Dive: Code Section 2.0 Behavior Analysts' Responsibility to Clients



Ethics in Practice Training Series

**PRESENTER: Jon Bailey, PhD,
BCBA-D**



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Housekeeping



1. Post questions. If your question is selected, we may unmute you and request that you repeat your question verbally.
2. If you experience technical issues during the webinar, contact Gotowebinar directly by calling (877) 582-7011.
3. There will be a 5 minute break near the half way point.
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Speaker Bio



Dr. Jon Bailey received his PhD from the University of Kansas and is currently Professor Emeritus of Psychology at Florida State University, where he was a member of the graduate faculty for 38-years and produced a record 63 PhDs. He is currently Director of the FSU Panama City Masters Program in Applied Behavior Analysis.

Dr. Bailey is a Board Certified Behavior Analyst. He is Secretary/Treasurer and Media Coordinator of the Florida Association for Behavior Analysis, which he founded in 1980.

Dr. Bailey has published over 100 peer-reviewed research articles, is a past editor of the *Journal of Applied Behavior Analysis*, and is co-author of *Research Methods in Applied Behavior Analysis*, *How Dogs Learn*, *Ethics for Behavior Analysts*, 2nd Expanded Edition, *How to Think Like a Behavior Analyst*, and *25 Essential Skills and Strategies for Professional Behavior Analysts*, all co-authored with Dr. Mary Burch.



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Resources and References



Resources

1. Professional and Ethical Compliance Code for Behavior Analysts
2. Full Presentation

References

Ethics for Behavior Analysts (3rd Edition)

<http://www.coebo.com/the-code>



Ethics
for Behavior Analysts

Jon S. Bailey
Mary R. Burch



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Ethics for Behavior Analysts 20% Discount Code



- [Routledge Taylor and Francis](https://www.routledge.com/) (Publisher) <https://www.routledge.com/>
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Learning Outcomes



1. Participants will have an in-depth understanding of all sections of code 2.0 of the *Professional and Ethical Compliance Code for Behavior Analyst*
2. Participants will know the responsibilities of accepting clients, providing consultation services, and involving third-parties in services.
3. Participants will know the rights and prerogatives of clients and treatment/intervention efficacy.
4. Participants will learn how to maintain confidentiality, records, and data, and when disclosures are appropriate.
5. Participants will discuss issues related to documenting professional work and research and when it is appropriate to interrupt or discontinue services.
6. Participants will learn about contracts, fees, financial arrangements, and accuracy in billing reports.



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Code 2.0 Triage Model



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High	Codes: 2.09, 2.15		
	Moderate		Codes: 2.01, 2.02, 2.03, 2.06,	Codes: 2.04, 2.05
	Low			Codes: 2.07, 2.08, 2.10, 2.11



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2.0 Behavior Analysts' Responsibility to Clients



- Behavior analysts have a responsibility to operate in the best interest of clients. The term client as used here is broadly applicable to whomever behavior analysts provide services, whether an individual person (service recipient), a parent or guardian of a service recipient, an organizational representative, a public or private organization, a firm, or a corporation.



2.01 Accepting Clients



- Behavior analysts accept as clients only those individuals or entities whose requested services are commensurate with the behavior analysts' education, training, experience, available resources, and organizational policies. In lieu of these conditions, behavior analysts must function under the supervision of or in consultation with a behavior analyst whose credentials permit performing such services.



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2.01 Accepting Clients

EXAMPLE SCENARIO



“Behavior analysts are not to work out of their area of competency.”

What are your thoughts on a new behavior analyst starting out with little experience?

Scenario presented by Jaime:



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate		Code 2.01	
	Low			



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2.02 Responsibility



- Behavior analysts' responsibility is to all parties affected by behavior-analytic services. When multiple parties are involved and could be defined as a client, a hierarchy of parties must be established and communicated from the outset of the defined relationship. Behavior analysts identify and communicate who the primary ultimate beneficiary of services is in any given situation and advocates for his or her best interests.



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2.02 Responsibility



EXAMPLE SCENARIO



"I work for a school district and find that I times I run into ethical issues that cannot be resolved according to the BACB code of ethics because I do not supervise employees. For example, in one of the autism classrooms I the teacher tends to use punishment procedures over positive behavior strategies, despite my recommendations and on-going classroom trainings. I have given feedback to my director and she says that she will address it, but nothing really changes."

Scenario presented by Marissa:

How should I handle these situations and is there more I should be doing ethically to support the classroom?



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate		Code 2.02	
	Low			



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2.03 Consultation

EXAMPLE SCENARIO



"I often consult with community agencies who provide residential services to adults with severe behavior problems. Too often agency staff who contact me have no knowledge about applied behavior analysis. They need a behavior plan to meet state requirements for individuals with exceptional rate funding. I recently received a call from an agency supervisor who explained that she was told by a state representative that she needed a behavior support plan for a client. The caller said that she did not know what a behavior plan is and that she has never heard of ABA. I spent some time telling her about the principles of ABA and that direct care staff have to implement a behavior plan reliably in order to see positive results. She said that she believed her direct care staff would implement the plan I wrote.

Scenario continued on next slide



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2.03 Consultation (also pertains to 2.01, 2.02)



EXAMPLE SCENARIO



Scenario presented by Carolyn:

“ My question is the following: I can agree to write a behavior plan in this situation even though I’m skeptical of the benefit the client will receive.

- Should I refuse to commit to writing a behavior plan if I believe agency staff is unable, or unwilling, to implement it reliably?
- Should I set step-by-step goals in the contract for agency staff performance and/or training and terminate the relationship without providing the behavior plan if they fail to meet each goal?
- Should I take the assignment, do the best I can with resources available, and tell supervisors that they have to be responsible for understanding the strategies and making sure staff comply with procedures? (My signature is on the behavior plan document and others will probably hold me responsible for results no matter what the contract states.)”



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate		Code 2.01, 2.02, 2.03	
	Low			



Special Learning

2.04 Third-Party Involvement in Services

- (a) When behavior analysts agree to provide services to a person or entity at the request of a third party, behavior analysts clarify, to the extent feasible and at the outset of the service, the nature of the relationship with each party and any potential conflicts. This clarification includes the role of the behavior analyst (such as therapist, organizational consultant, or expert witness), the probable uses of the services provided or the information obtained, and the fact that there may be limits to confidentiality.
- (b) If there is a foreseeable risk of behavior analysts being called upon to perform conflicting roles because of the involvement of a third party, behavior analysts clarify the nature and direction of their responsibilities, keep all parties appropriately informed as matters develop, and resolve the situation in accordance with this Code.



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2.04 Third-Party Involvement in Services



- (c) When providing services to a minor or individual who is a member of a protected population at the request of a third party, behavior analysts ensure that the parent or client-surrogate of the ultimate recipient of services is informed of the nature and scope of services to be provided, as well as their right to all service records and data.
- (d) Behavior analysts put the client's care above all others and, should the third party make requirements for services that are contraindicated by the behavior analyst's recommendations, behavior analysts are obligated to resolve such conflicts in the best interest of the client. If said conflict cannot be resolved, that behavior analyst's services to the client may be discontinued following appropriate transition.



2.04 Third-Party Involvement in Services

EXAMPLE SCENARIO



A behaviour analyst is working in a multidisciplinary clinic. The Occupational Therapist at the clinic is providing 1:1 services for a 5 year old with Down Syndrome. The OT notices some maladaptive behaviours and some skill deficits and asks for the BCBA's help. Upon receiving the case, the BCBA realises that the client is actually a relative.

“Should the BCBA proceed with treating this client or is this a conflict of interest given that the BCBA and the client are family members?”

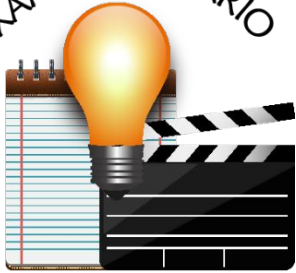
Scenario presented by Kimberly:



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2.04 develops into 2.06, 2.08

EXAMPLE SCENARIO



Scenario presented by Kimberly:

“Following the previous scenario, you as the behaviour analyst decide to take on the case with the client with Down Syndrome, because there is nobody else to take the case. You are trying to remain as professional and objective as possible. During a family gathering, the mutual relative (between yourself and your client), inquires how your client is doing in therapy? She asks what is he working on, if he is progressing well?”

“What is the best way to respond to your relative?”



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate		Code 2.08	Code 2.04
	Low			Code 2.08



Special Learning

2.05 Rights and Prerogatives of Clients

- (a) The rights of the client are paramount and behavior analysts support clients' legal rights and prerogatives.
- (b) Clients and supervisees must be provided, on request, an accurate and current set of the behavior analyst's credentials.
- (c) Permission for electronic recording of interviews and service delivery sessions is secured from clients and relevant staff in all relevant settings. Consent for different uses must be obtained specifically and separately.



2.05 Rights and Prerogatives of Clients

- (d) Clients and supervisees must be informed of their rights and about procedures to lodge complaints about professional practices of behavior analysts with the employer, appropriate authorities, and the BACB.
- (e) Behavior analysts comply with any requirements for criminal background checks.

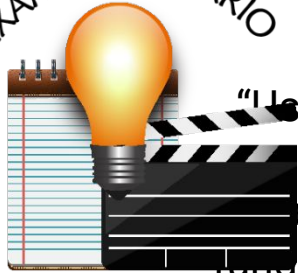


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2.05 Rights and Prerogatives of Clients



EXAMPLE SCENARIO



Scenario presented by Denise:

"Using hugs and 'high-fives' as reinforcement. We ran into a situation where a parent stated that s/he was fine with this and then at a certain point became uncomfortable with it and reported our Behavior Interventionist to the funding source. So.. how to protect against this type of complaint. In my professional opinion one should send out a agency-wide policy banning the use of any reinforcement that utilizes physical interaction to protect against these types of parent complaints."



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate			Code 2.05
	Low			



Special Learning

2.06 Maintaining Confidentiality



- (a) Behavior analysts have a primary obligation and take reasonable precautions to protect the confidentiality of those with whom they work or consult, recognizing that confidentiality may be established by law, organizational rules, or professional or scientific relationships.
- (b) Behavior analysts discuss confidentiality at the outset of the relationship and thereafter as new circumstances may warrant.
- (c) In order to minimize intrusions on privacy, behavior analysts include only information germane to the purpose for which the communication is made in written, oral, and electronic reports, consultations, and other avenues.



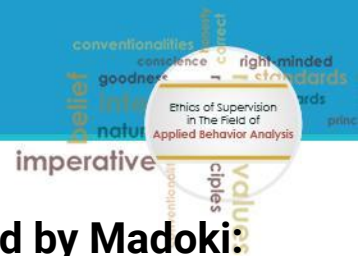
2.06 Maintaining Confidentiality



- (d) Behavior analysts discuss confidential information obtained in clinical or consulting relationships, or evaluative data concerning clients, students, research participants, supervisees, and employees, only for appropriate scientific or professional purposes and only with persons clearly concerned with such matters.
- (e) Behavior analysts must not share or create situations likely to result in the sharing of any identifying information (written, photographic, or video) about current clients and supervisees within social media contexts.



2.06 Maintaining Confidentiality



EXAMPLE SCENARIO



Scenario presented by Madoki:

"With the current expansion of SNS and consumer reviews on internet, I would like Dr. Bailey's thoughts on recruiting parent testimonial for a home-based services. I learned a few days ago that one of the consumers' had been asked by the owner of the business to write a testimonial on the Facebook page of the business. The parents did not want to disclose their identity, and they had been "pretending" that they forgot."

What could be a safe way to promote testimonial from consumers?



Special Learning

[illegible]

Ethics of Supervision in The Field of Applied Behavior Analysis

c

values
conventions

2.07 Maintaining Records



- (a) Behavior analysts maintain appropriate confidentiality in creating, storing, accessing, transferring, and disposing of records under their control, whether these are written, automated, electronic, or in any other medium.
- (b) Behavior analysts maintain and dispose of records in accordance with applicable laws, regulations, corporate policies, and organizational policies, and in a manner that permits compliance with the requirements of this Code.



2.07 Maintaining Records



EXAMPLE SCENARIO



Scenario presented by Sarah:

"A center has recently had issues with clinical leadership giving out their log in information which allows unauthorized individuals access to confidential files. The issue has been addressed with those in clinical leadership and passwords have been changed."

"Is it the responsibility of the center to inform parents about the breach?"



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate			
	Low			Code 2.07



Special Learning

2.08 Disclosures



- Behavior analysts never disclose confidential information without the consent of the client, except as mandated by law, or where permitted by law for a valid purpose, such as:
 - (1) to provide needed professional services to the client,
 - (2) to obtain appropriate professional consultations,
 - (3) to protect the client or others from harm, or
 - (4) to obtain payment for services, in which instance disclosure is limited to the minimum that is necessary to achieve the purpose. Behavior analysts recognize that parameters of consent for disclosure should be acquired at the outset of any defined relationship and is an ongoing procedure throughout the duration of the professional relationship.



2.08 Disclosures

EXAMPLE SCENARIO



Scenario presented by Kimberly:

“You live in a small town where everyone knows each other. Everyone in your community knows that you are the BCBA and they already know all the clients you provide services for. Everyone knows each other. One day, a related health professional e.g. a Speech Pathologist that does not provide services for one of your clients with severe speech delays inquires how your client is doing in ABA therapy. The SLP has no professional relationship with your client but is a close family friend of the client’s family.”

“How do you respond if the SLP already knows identifying information regarding your client? How do you handle this situation?”



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate			
	Low			Code 2.08



Special Learning

2.09 Treatment/Intervention Efficacy



- (a) Clients have a right to effective treatment (i.e., based on the research literature and adapted to the individual client). Behavior analysts always have the obligation to advocate for and educate the client about scientifically supported, most-effective treatment procedures. Effective treatment procedures have been validated as having both long-term and short-term benefits to clients and society.
- (b) Behavior analysts have the responsibility to advocate for the appropriate amount and level of service provision and oversight required to meet the defined behavior-change program goals.

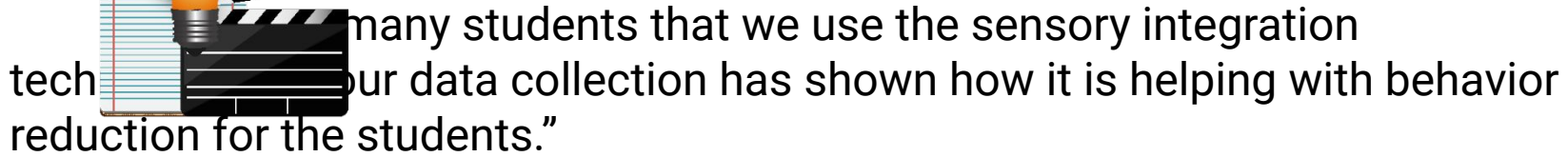


2.09 Treatment/Intervention Efficacy



- (c) In those instances where more than one scientifically supported treatment has been established, additional factors may be considered in selecting interventions, including, but not limited to, efficiency and cost-effectiveness, risks and side-effects of the interventions, client preference, and practitioner experience and training.
- (d) Behavior analysts review and appraise the effects of any treatments about which they are aware that might impact the goals of the behavior-change program, and their possible impact on the behavior- change program, to the extent possible.





"If the data is collected to evaluate the effectiveness of the sensory plan in place, is it ethical to use this sensory plan and continue it as a behavior reduction method?"



Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High	Code 2.09		
	Moderate			
	Low			



Special Learning

2.10 Documenting Professional Work and Research



- (a) Behavior analysts appropriately document their professional work in order to facilitate provision of services later by them or by other professionals, to ensure accountability, and to meet other requirements of organizations or the law.
- (b) Behavior analysts have a responsibility to create and maintain documentation in the kind of detail and quality that would be consistent with best practices and the law.



2.10 Documenting Professional Work and Research



Scenario presented by Sarah:

“If a therapist sees that the data being provided to parents in a report is not accurately reflecting how data was taken for the client, how should he or she handle this situation?”



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A word cloud with a central white circle containing the text "Ethics of Supervision in the Field of Applied Behavior Analysis". Surrounding this central circle are various words in different sizes and orientations, including "imperative", "values", "principles", "conventional", "belief", "goodness", "consistency", "right-minded", "standards", "principles", "conventional", "belief", "goodness", "consistency", "right-minded", "standards", "principles", "conventional", "belief", "goodness", "consistency", "right-minded", "standards", "principles".

SEVERITY OF HARM CAUSED BY VIOLATION



2.11 Records and Data

- (a) Behavior analysts create, maintain, disseminate, store, retain, and dispose of records and data relating to their research, practice, and other work in accordance with applicable laws, regulations, and policies; in a manner that permits compliance with the requirements of this Code; and in a manner that allows for appropriate transition of service oversight at any moment in time.
- (b) Behavior analysts must retain records and data for at least seven (7) years and as otherwise required by law.



2.11 Records and Data



Scenario presented by Sarah:

“Parents decide to switch their child to a different autism center. The new autism center has requested all data and reports from that child’s treatment, however the old center doesn’t want to share their data and information.”

“Can the parents demand that they provide it all or is some data allowed to be withheld?”



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate			
	Low			Code 2.11



Special Learning

2.12 Contracts, Fees, and Financial Arrangements



- (a) Prior to the implementation of services, behavior analysts ensure that there is in place a signed contract outlining the responsibilities of all parties, the scope of behavior-analytic services to be provided, and behavior analysts' obligations under this Code.
- (b) As early as is feasible in a professional or scientific relationship, behavior analysts reach an agreement with their clients specifying compensation and billing arrangements.



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2.12 Contracts, Fees, and Financial Arrangements



- (c) Behavior analysts' fee practices are consistent with law and behavior analysts do not misrepresent their fees. If limitations to services can be anticipated because of limitations in funding, this is discussed with the client as early as is feasible.
- (d) When funding circumstances change, the financial responsibilities and limits must be revisited with the client.



2.12 Contracts, Fees, and Financial Arrangements

EXAMPLE SCENARIO



How much is 'enough'. Is it fiscally responsible and ethically prudent to be providing ABA services to individuals for over 3+ years with "slow but steady" treatment response when so many other young children are in need and there is a shortage of BCBAs and quality ABA services?"



Question from Jenna:



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate		Code 2.12	
	Low			



Special Learning

2.13 Accuracy in Billing Reports

- Behavior analysts accurately state the nature of the services provided, the fees or charges, the identity of the provider, relevant outcomes, and other required descriptive data.



2.13 Accuracy in Billing Reports

EXAMPLE SCENARIO



While working for a company I experienced a lot of pressure from the owners to incorporate many non-behavioral practices and refrain from using ABA therapy. I was surprised as I was hired as a Behavior Analyst. It turned out that the owners had a strong anti-ABA approach and openly talked about “providing better services than ABA” but had to have a BCBA on board. Having the clients in mind I decided to educate the owners, and I started seeing some changes in their approach to ABA. When I discovered the company's unusual billing practices I thought they did not understand the billing issues. I decided to approach the owners and explain what can be billed and who can bill for given services. Quickly I realized that they did not quite care about billing accuracy, as billing itself was the main concern for the company. At this point I felt I attempted to fix the issues but was not going to be successful so I removed myself from this environment and quit.”

“Could I have done something different?”

Question from Agnieszka:



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate		Code 2.13	
	Low			



Special Learning

2.14 Referrals and Fees



- Behavior analysts must not receive or provide money, gifts, or other enticements for any professional referrals. Referrals should include multiple options and be made based on objective determination of the client need and subsequent alignment with the repertoire of the referee. When providing or receiving a referral, the extent of any relationship between the two parties is disclosed to the client.



2.14 Referrals and Fees

EXAMPLE SCENARIO



My question relates to issues of contacting clients. I've referred some clients to providers who I thought might meet the client's individual needs better than I could as a sole practitioner without a staff of therapists. I'd like to 'check-in' with those referred clients to make sure their needs are served by the other practitioner."

1. Is this an acceptable practice?
2. What should I do if I contact the client or the client contacts me and indicates he/she is not satisfied with the other practitioner's work?



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High			
	Moderate		Code 2.14	
	Low			



Special Learning

2.15 Interrupting or Discontinuing Services



- (a) Behavior analysts act in the best interests of the client and supervisee to avoid interruption or disruption of service.
- (b) Behavior analysts make reasonable and timely efforts for facilitating the continuation of behavior- analytic services in the event of unplanned interruptions (e.g., due to illness, impairment, unavailability, relocation, disruption of funding, disaster).
- (c) When entering into employment or contractual relationships, behavior analysts provide for orderly and appropriate resolution of responsibility for services in the event that the employment or contractual relationship ends, with paramount consideration given to the welfare of the ultimate beneficiary of services.



2.15 Interrupting or Discontinuing Services

- (d) Discontinuation only occurs after efforts to transition have been made. Behavior analysts discontinue a professional relationship in a timely manner when the client: (1) no longer needs the service, (2) is not benefiting from the service, (3) is being harmed by continued service, or (4) when the client requests discontinuation. (See also, 4.11 Discontinuing Behavior-Change Programs and Behavior-Analytic Services)
- (e) Behavior analysts do not abandon clients and supervisees. Prior to discontinuation, for whatever reason, behavior analysts: discuss service needs, provide appropriate pre-termination services, suggest alternative service providers as appropriate, and, upon consent, take other reasonable steps to facilitate timely transfer of responsibility to another provider.



2.15 Interrupting or Discontinuing Services

EXAMPLE SCENARIO



Scenario from Carolyn:

a private practitioner, I have had some clients fade away after with them even though they have not terminated with me.”

1. Should I send a letter of termination after repeated attempts to contact them?
2. If so, how long should I wait to send the letter and what should it include?



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High	Code 2.15		
	Moderate			
	Low			



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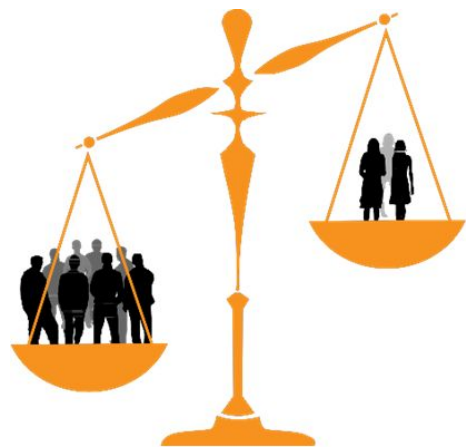
International Scenarios and Considerations



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Unintended Consequences

Supply/Demand Imbalance



	Region	RBT	BCBA/BCaBA /BCBA-D	Total Credentialed
1	United States	17,562	20,845	38,407
2	Canada	155	845	1,000
3	United Arab Emirates	138	43	181
4	Romania	95	31	126
5	Italy	58	72	130
6	Australia	52	53	105
7	Korea Republic Of	48	31	79
8	Nigeria	47	-	47
9	Georgia	34	1	35
10	France	31	31	62
11	United Kingdom (gb)	23	234	257
12	India	23	23	46
13	Chile	22	1	23
14	China	18	60	78
15	Philippines	18	3	21
16	Japan	15	13	28
17	Ireland	13	107	120
18	Russian Federation	12	10	22
19	Netherlands	12	9	21
20	Greece	12	5	17
21	Malta	10	-	10
	Total	18,505	22,741	41,246
		45%	55%	



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Areas of Code 2 that are larger concerns for the international community:

- 2.01 Accepting Clients (pressure to accept clients due to lack of availability of services)
- 2.15 Interrupting or Discontinuing Services (terminating services may be more challenging because there may not be another BCBA to take over the case)



2.15 Interrupting or Discontinuing Services

EXAMPLE SCENARIO



Scenario from Kimberly:

“As the supervising behaviour analyst on the case, your client is receiving 10 hours of therapy per week. The mother cancels sessions an average of 2x a week at random. Over the past 4 months, the client has accumulated a total duration of 20 hours in cancellation hours. You have spoken with the parent and showed them the data which shows the hampered progress of their child due to the frequent cancellations. They continue to cancel sessions and have cancelled all scheduled parent training sessions.

“Do you continue to provide services for this family or do you discontinue services? What is the best way to handle this situation?”



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Triage Model in Application



TRIAGE OF ETHICS VIOLATIONS

SEVERITY OF HARM CAUSED BY VIOLATION

		Severe	Moderate	Mild
Probability of Harm	High	Code 2.15		
	Moderate			
	Low			





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