

# **Employee Handbook & Code of Ethics**

Behavioral Health Agency Standards

*2025*

*CT ABA SERVICES LLC*

*1000 LAFAYETTE BLVD., STE 1100, BRIDGEPORT CT 06604-4710*



# Employee Handbook & Code of Ethics

*Behavioral Health – Applied Behavior Analysis (ABA) Services  
Connecticut Public Health & HUSKY Standards*

---

## Section 1: Introduction

Welcome to **CT ABA SERVICES LLC**. Our mission is to provide high-quality, evidence-based Applied Behavior Analysis (ABA) services to individuals with Autism Spectrum Disorder and related developmental needs, in accordance with:

- **Connecticut Department of Public Health (DPH)** laws and regulations
- **HUSKY Health (CT Medicaid)** coverage requirements and payer policies
- **Behavior Analyst Certification Board (BACB) Ethics Code**
- Federal and state standards, including HIPAA and mandated reporting

This Handbook sets forth our **Code of Ethics** and **employment policies** to guide professional conduct and ensure compliance with all governing standards.

## Definition and Scope of Practice

Behavioral Therapists, as defined by the State of Connecticut, work to assess, diagnose, and provide evidence-based interventions for individuals with ASD. This includes the design and implementation of Behavior Intervention Plans (BIPs) and individualized treatment strategies, as per CT regulations.

## Client Population

- Behavioral Therapists in CT serve individuals of all ages with ASD, in line with the state's demographic characteristics.

## Team Collaboration

- Behavioral Therapists in CT collaborate with a multidisciplinary team, including speech therapists, occupational therapists, teachers, and other professionals, in accordance with Connecticut's regulations regarding multidisciplinary collaboration.

## Cultural Competence

Behavioral Therapists in CT must be culturally sensitive and respectful of the values, beliefs, and practices of clients and their families, consistent with Connecticut's diverse culture.

## Professional Development

Continual professional development is encouraged, and therapists are expected to stay current with research and best practices in line with Connecticut's recognized continuing education standards.

---

## Section 2: Code of Ethics (ABA & Behavioral Health Specific)

All employees agree to uphold the following ethical principles:

1. **Client-Centered Care** – Prioritize client dignity, rights, and welfare at all times.
2. **Evidence-Based Practice** – Deliver ABA services using empirically validated methods.
3. **Integrity & Honesty** – Report data accurately, maintain truthful documentation, and disclose conflicts of interest.
4. **Confidentiality** – Protect all Protected Health Information (PHI) under HIPAA.
5. **Compliance with Law & Payers** – Follow CT DPH regulations, HUSKY Health standards, and applicable payer policies.
6. **Scope of Competence** – Provide services only within one's certification, training, and supervision.
7. **Professional Boundaries** – Maintain appropriate relationships with clients, families, and colleagues.
8. **Mandatory Reporting** – Immediately report suspected abuse/neglect to DCF and per CT law.
9. **Cultural Humility** – Deliver services with respect for diversity, culture, and inclusion.
10. **Accountability** – Accept responsibility for one's actions and uphold organizational policies.
11. **Communication** – Ensure all notifications on company applications are turned on and checked daily as well as ensuring timely response to any company communication.

---

## Section 3: Employment Policies

### 3.1 Attendance Policy & Time-Off Requests

- Employees must adhere to scheduled sessions to ensure client treatment continuity.
- Cancellations must be communicated to supervisor **at least 24 hours in advance** (except emergencies).
- Excessive tardiness or absenteeism may result in corrective action up to termination.
- **Time-off requests** must be submitted via HR portal or company email **at least 2 weeks in advance**.

### 3.2 Training Compliance & Certifications

- All staff must complete **mandatory company training** within 30 days of hire specific to each training compliance per position., including: All company compliance Training, HIPAA, mandated reporting, safety/crisis prevention, and HUSKY documentation standards.
- **Clinical Director & BCBAs** must maintain active CT LBA license and BCBA credential.
- **RBTs** must maintain BACB certification and annual renewal; BTs must complete RBT credential within timeline if required.
- Failure to maintain certification/licensure may result in suspension or termination.

### 3.3 Proper & Timely Data Collection

- Session data must be entered **during or immediately after each session** using the company's EHR/data collection system.
- Progress notes must be completed **within 1 hour** of session.
- Data falsification or late submission is considered a **serious compliance violation** subject to termination.

### 3.4 Company Property & Materials

- All company-issued laptops, tablets, manuals, assessment kits, and data sheets remain **company property**.
- All company materials are signed for upon exchange (initiating materials contract).
- Employees are responsible for proper care and return of all items upon termination.
- Unauthorized use of company property for personal business is prohibited.
- If company property is not returned last check(s) will be held until investigation is conducted and completed. If for any reason property is missing/broken without proper company and/or legal documentation, the total difference will be deducted from wages prior to being released.

### 3.5 Client Transportation in Personal Vehicles

- Transporting clients in personal vehicles is **discouraged** and requires prior written approval.
- If approved, employee must:
  - Submit proof of valid CT driver's license, auto insurance, and signed **Liability Waiver Form** from CT ABA Services and Client/Guardian.
  - Ensure proper use of seatbelts/car seats per CT law.
  - Complete company's **Transportation Authorization & Liability Form**.
- The company assumes no liability for unauthorized transport.

### 3.6 Company Identification

- Employees must carry/display **Company ID badge** when representing the company in community, home, or school settings.
- Lost or stolen IDs must be reported immediately.

### 3.7 Termination Policy & Return of Property

- Employment is **at-will** and may be terminated by either party with proper written notice (14 days) or immediately for cause of termination
- Upon termination, employees must return **all company property**, including ID badges, technology, training materials, assessment tools, and documentation.
- Failure to return items may result in final paycheck withholding as permitted by law.
- Failure to return or unreported damage to company device can result in legal action.
- An Incident Report is to be filed immediately regarding any company materials lost broken forgotten or stolen. Failure to do so can result in immediate disciplinary action.

### 3.8 Incident Reports & Documentation

- Any **injury, accident, suspected abuse/neglect, client elopement, restraint, destruction mishap of company materials/property, or critical event** must be documented on the Company **Incident Report Form** within **24 hours**.
- Serious incidents must be reported immediately to supervisor and, if required, to **CT DPH, DCF, and/or payer**.
- Employees are responsible for accurate, objective, and complete incident documentation.

### 3.9 Device, Data collection and session Notes

- **Cellular and/or company device must always be charge and ready for session.** Lack of battery or functionally working device is no longer an excuse for non-submission.
- **Data Collection must be completed in real-time.**
- **Session Notes are to be Submitted no later than 30 min after completing session.**

- All employees must be accessible through Microsoft Teams app. During any schedule time of service.

### 3.10 Performance Evaluation

- All employees must Pass 2 Performance Evaluations a year at 6 month and 1Year intervals with results possibly having +/- effects on salary due to performance.

### 3.11 Client Care

- All employees are to uphold the best standards of care with each client.
- Refrain from being secluded with client in closed areas.
- Wet work is not approved or tolerated as part of our duties. Client and guardian are to be instructed to perform activities with bathing suit, making sure client is clothed at all times and the guardian provides all the hands-on help in any bathroom or body care scenarios.
- At no time is the client to be left in the sole care of an employee. Guardian should always be present in the location.

---

## Section 4: Disciplinary Action

Violations of this Handbook, Code of Ethics, or applicable laws/regulations may result in:

- Verbal warning
- Written warning
- Suspension (with/without pay)
- Termination of employment

Serious violations (e.g., data falsification, HIPAA breaches, client endangerment) are grounds for **immediate termination and possible legal ramifications**.

---

## Section 5: Benefits

CT ABA Service LLC offers all Salaried and Full-Time Employees the following benefits:

- Medical, Dental, and Vision Insurance at a 50% compensation rate for employee monthly premiums leaving employees responsible for the other 50% being distributed evenly and deducted over bi-weekly checks each month
- 1 week paid Vacation, plus 3 sick days over 1 calendar year
- PTO accrument : 1hr earned for every 35hrs worked.

# Section 6: Legal & Regulatory Compliance in Connecticut for ASD Providers

## Legal & Regulatory Compliance in Connecticut for ASD Providers

### 1. Licensing & Certification (CT-specific licensure and certification)

- Behavior Analyst Licensure:
  - In Connecticut, one must hold a valid license issued by the Connecticut Department of Public Health (DPH) to practice as a "behavior analyst." This requires BACB (Board Certified Behavior Analyst) certification or endorsement by a licensed behavior analyst (DPH) [Maya Murphy Law Behavior Analyst Certification Board](#).
  - Application fees are \$350 initially, with a \$175 renewal fee; reinstatement (if lapsed) also costs \$350 [CT.gov](#).
- Medicaid (HUSKY Health) Provider Qualifications:
  - ASD treatment providers must be enrolled in Connecticut's Medicaid program (HUSKY Health) as either individual or group "performing providers."
  - They must have specialized training, experience, or expertise in ASD, under supervision of licensed practitioners or BCBAs within their scope of practice [Husky Health](#).
- Qualifications for ASD Services Providers:  
Providers (including physicians, APRNs, PAs, psychologists, LCSWs, LMFTs, LPCs, and BCBAs) must meet the following [Husky Health](#):
  - Continuing Education: At least 18 hours in ASD services within the past three years.
  - Experience: Minimum of 2 years full-time equivalent post-licensure/certification treating individuals with ASD.
  - Advanced Training or Supervision: Either:
    - Graduate-level coursework ( $\geq 15$  credit-hours) covering ASD-related content (diagnosis, treatment, child development, psychopathology, family systems, multicultural diversity), or
    - One year of supervised professional experience under a qualified ASD provider (licensed and experienced in ASD).
- Technicians (e.g., RBT or behavior technicians):
  - May deliver ASD treatment services, but only under direct supervision by an appropriately credentialed and enrolled licensed practitioner or BCBA [Husky Health](#).

---

### 2. Reporting Child Abuse (CT's Mandatory Reporting Requirements)

- Who Must Report:
  - Connecticut law mandates nearly all mental health professionals—including psychologists, LCSWs, LMFTs, LPCs, behavior analysts, and other ASD

providers—must report suspected child abuse or neglect [CT.gov Child Welfare Information Gateway](#).

- Reporting Timeline:
    - Oral or electronic report must be made as soon as practicable, but no later than 12 hours after suspecting abuse/neglect or imminent risk of harm [Justia Law Child Welfare Information Gateway](#).
    - A written report (DCF-136 form) must follow within 48 hours of the oral/electronic report [United Way of Connecticut Child Welfare Information Gateway](#).
  - Reporting Process and Confidentiality:
    - Reports are submitted to the Department of Children and Families (DCF) Careline (1-800-842-2288). Online (non-emergent) reporting via DCF portal is also allowed [United Way of Connecticut](#).
    - Mandated reporters must give their name when reporting but can request anonymity; identities are kept confidential unless disclosure is required by law (e.g., for false reporting investigations) [United Way of Connecticut RAINN](#).
  - Penalties for Non-Reporting or Interference:
    - Failing to report is a Class A misdemeanor, punishable by up to 1 year in prison and/or a fine up to \$2,000; may also require attendance in a mandated reporting training [naswct.socialworkers.org](#).
    - Interfering with another's duty to report can escalate to a Class D felony, punishable by up to 5 years in prison and/or a \$5,000 fine [naswct.socialworkers.org](#).
- 

### 3. HIPAA Compliance (CT HIPAA Regulations for ASD Providers)

- Federal HIPAA Standards Apply:
  - ASD providers in Connecticut are covered entities or business associates under HIPAA and must adhere to federal Privacy, Security, and Breach Notification Rules [CT.gov](#).
- State-level Enforcement:
  - Injured parties may file complaints with federal OCR or the Connecticut Office of the Attorney General, both of whom can initiate enforcement actions, including civil lawsuits, for HIPAA violations [CT.gov](#).
  - Connecticut law recognizes a private cause of action for HIPAA breaches, allowing individuals to sue negligent providers for unauthorized disclosure of health information [American Med Spa Association](#).
- Compliance Best Practices (CT Context):
  - Implement a robust HIPAA compliance program tailored to your practice's operations, including annual security risk assessments (ideally six per year) and corresponding remediation plans [Compliance Group](#).
  - Develop and annually review written policies and procedures addressing Privacy, Security, and Breach notification tailored to ASD service delivery [Compliance Group](#).
  - Ensure annual HIPAA training for all staff accessing Protected Health Information (PHI), with employee attestations of compliance [Compliance Group](#).



- Establish Business Associate Agreements (BAAs) with any third-party vendors (e.g., EHR platforms, email services, cloud services) that may handle PHI [Compliance Group](#).
- Maintain systems for incident detection, response, breach reporting, and anonymous internal incident reporting [Compliance Group](#).

---

## Summary Table: CT Legal Requirements for ASD Providers

Area	Key CT Requirements for ASD Providers
Licensing & Certification	Must hold CT DPH license (for BCBAs) or appropriate provider credentials; meet training, experience, and supervision standards; enroll/re-enroll in HUSKY network
Mandatory Reporting	Must report suspected child abuse/neglect within 12 hours (oral), 48 hours (written); reporting is confidential; penalties for non-reporting or interference
HIPAA Compliance	Must follow federal HIPAA rules; state enforcement allows private suits; need risk assessments, policies, annual training, BAAs, and breach protocols

## Section 7: Acknowledgment

I have received, read, and understand the **CT ABA SERVICES LLC Employee Handbook & Code of Ethics**. I agree to comply with all policies, procedures, and ethical obligations.

**Employee Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Supervisor Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_