Full Spectrum Behavior Analysis

Medical Director Responsibilities

Section 400.9935, Florida Statutes, requires that the medical director accept, in writing, legal responsibility for certain activities of the clinic.

The medical director shall:

1. Have signs identifying the medical director or clinical director posted in a conspicuous location;
* Will complete upon hire of Medical Director.

(b) Ensure that all practitioners providing health care services or supplies to patients maintain a current, active and unencumbered Florida license;

* Behavior analysts do not have licensure in Florida but do have certification. The Medical Director will be the designated license holder and must maintain an active license to practice in the state of Florida.

(c) Review any patient referral contracts or agreements executed by the clinic;

* Corporate staff will present any subsequent patient referral contracts or agreements to the Medical Director for review prior to execution. FSBA currently has informed consent documents that the patient is required to sign during the initial intake.

(d) Ensure that all health care practitioners at the clinic have active appropriate certification or licensure for the level of care being provided;

* All providers must hold certification through the BACB board (RBT, BCaBA, BCBA) or have an active license in the state of Florida to bill as a lead analyst under Provider 39 (social workers, LMHC’s, etc). FSBA only has one provider working with the company who does not have certification through the BACB.
* Quality Assurance Tasks: Run billing report. Select providers to audit to ensure active certification. May request Admin to pull provider file or view on the BACB website.

(e) Serve as the clinic records owner as required under Chapter 456, Florida Statutes;

* FSBA uses Egnyte cloud-storage software to house client files (BASPs, Incident Reports, etc.) for a minimum of seven years.
* Quality Assurance Tasks: Run reports of all clients to be seen in past seven years. Select clients to audit for records.

(f) Ensure compliance with the recordkeeping, office surgery, and adverse incident reporting requirements of Florida Statutes and rules;

* Client files are securely stored with the use of HIPAA compliant software. In addition, FSBA uses a HIPAA compliant email suite and has additional professional cyber security to protection. All laptops with access to client files are locked, password protected and out of sight from the exterior of the building. The company Policies and Procedures manual provides information on Incident Reporting.
* Quality Assurance Task: Review Adverse Incident Reporting Log. Request to review the Adverse Event Incident Reports that are logged and stored in the individual client file.

(g) Conduct systematic reviews of clinic billings to ensure that the billings are not fraudulent or unlawful, and upon discovery of any unlawful charge, take immediate corrective action.

* Quality Assurance Task: Review billing activity each month. Complete Medical Director Log (attached) and submit to FSBA Corporate office for records.

Additional Quality Assurance Tasks:

* Be available to meet in person once per month with FSBA Corporate staff for a meeting to discuss the outcomes of Medical Director record reviews and audits.