



COMPLIANCE COMPASS

AN INTERNAL AUDIT CHECKLIST FOR ABA PROVIDERS TO STAY AUDIT-READY & COMPLIANT



1 HR & Personnel Files

- ☐ Verify completion of Form I-9 & proper storage per USCIS guidelines.
- ☐ Maintain documentation of professional licenses & certifications with expiration tracking.
- ☐ Retain up-to-date health screenings (TB tests) & background check results (OIG, SAM, Live Scan) as required by payors.
- ☐ Ensure job descriptions are current, role-specific, & reference qualifications tied to payor requirements.
- ☐ Store all signed offer letters, pay rate acknowledgments, & proof of qualifications for billing purposes.

2 HIPAA & Confidentiality

- ☐ Ensure all staff complete HIPAA Privacy & Security training upon hire & periodically.
- ☐ Keep signed confidentiality & HIPAA acknowledgment forms in personnel files.
- ☐ Document role-based training on ePHI use across company platforms, email, & communication tools.
- ☐ Conduct periodic risk assessments of data storage systems to satisfy audit expectations from payors.

3 Training & Competency

- ☐ Verify 40-hour RBT training and completed Initial Competency Assessment per BACB requirements, with documentation from an approved provider & qualified assessor.
- ☐ Ensure all staff complete payor-required trainings (Mandated Reporting, Cultural Competency, Blood Borne Pathogens).
- ☐ Document ongoing competency reviews & direct/indirect supervision hours per BACB & payor standards.
- ☐ Retain up-to-date CPR, First Aid, & other safety certifications, including expiration dates.

4 Policy Compliance

- ☐ Ensure your employee handbook and policy manual are updated to reflect federal standards (EEOC, FMLA, ADA) & applicable payor expectations.
- ☐ Document employee acknowledgment of fraud, waste, & abuse policies as required by Medicare/Medicaid.
- ☐ Maintain written protocols for incident reporting, documentation standards, & billing integrity.
- ☐ Review & revise policies as needed annually, especially in response to new audit guidelines from payors.
- ☐ Keep internal audit logs & corrective action plans for compliance lapses or issues identified during reviews.

Schedule a free call to explore how Zenly can be your guide to confident compliance.



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