Practice Closure Plan

Timeline, client transitions, records and wind down for a solo or small therapy practice

Plan the ending early, tell clients in person first, and keep every record reachable.

Practice and closure

Practice | Clinician and license | Last day of sessions

Reason (retiring, moving, joining a group, health) | State(s) licensed | Board rule for retention

1. Timeline: work backward from the last day

Step	Suggested timing	Target date	Owner	Done
1. Pick the last day of sessions; tell your attorney, accountant, carrier	~6 months out			☐
2. Tell clients in session, one by one; start referral list	~90 days			☐
3. Written notice to current clients (letter, portal or secure email)	60 to 90 days			☐
4. Notice to former clients; website, voicemail, directories	~60 days			☐
5. Warm handoffs for higher risk clients; transition plans	30 to 60 days			☐
6. Last sessions; discharge or transfer summaries	Final weeks			☐
7. Final claims, superbills, refunds; payer and Medicare notices	Close + 90 days			☐
8. Records to custodian or archive; BAA signed; test access	By close			☐
9. Cancel or archive systems; forward phone and email	After records			☐
10. License status, CAQH, NPI deactivation, tail coverage	After claims			☐

2. Client transitions

Active clients (number) | Need a warm handoff | Referral list updated on | Written notice sent on

Default if a client does not reply by the deadline (what the letter said)

3. Records plan: where they are now, who holds them after

☐ EHR or practice software ☐ Paper charts ☐ Email and texts

☐ Telehealth platform ☐ Billing or clearinghouse ☐ Scanned or cloud files

Records custodian (name, role, contact) | Keep until (latest client) | BAA or agreement signed

How clients request records after closing | Access tested on | Destroy how, and when

4. Wind down: tick when done

☐ Malpractice tail checked ☐ Payers notified ☐ Medicare (if enrolled)

☐ CAQH updated ☐ NPI (after claims) ☐ License status

☐ Lease, phone, answering ☐ Website, directories ☐ Bank, taxes, entity

Plan prepared by | Date | Reviewed with (attorney, colleague) | Next check in

Keep client names off this page. Track each client on page 3 by initials or code.

A planning worksheet, not legal advice. Your state law and board rules decide retention and notice.

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Practice Closure Plan

Timeline, client transitions, records and wind down for a solo or small therapy practice

FILLED EXAMPLE · fictional practice, people, places and dates

Practice and closure

Practice	Clinician and license	Last day of sessions
Willow Bend Counseling, PLLC	D. Marsh, LPC (fictional)	03/31/2027

Reason (retiring, moving, joining a group, health)	State(s) licensed	Board rule for retention
Retiring after 26 years in practice	Texas	22 TAC 681.36(b): 7 yrs or age 23

1. Timeline: work backward from the last day

Step	Suggested timing	Target date	Owner	Done
1. Pick the last day of sessions; tell your attorney, accountant, carrier	~6 months out	10/01/2026	DM	☑
2. Tell clients in session, one by one; start referral list	~90 days	01/04/2027	DM	☑
3. Written notice to current clients (letter, portal or secure email)	60 to 90 days	01/15/2027	DM	☑
4. Notice to former clients; website, voicemail, directories	~60 days	01/29/2027	Admin	☑
5. Warm handoffs for higher risk clients; transition plans	30 to 60 days	02/15/2027	DM	☑
6. Last sessions; discharge or transfer summaries	Final weeks	03/31/2027	DM	☐
7. Final claims, superbills, refunds; payer and Medicare notices	Close + 90 days	06/30/2027	Biller	☐
8. Records to custodian or archive; BAA signed; test access	By close	03/31/2027	DM, KI	☐
9. Cancel or archive systems; forward phone and email	After records	04/30/2027	Admin	☐
10. License status, CAQH, NPI deactivation, tail coverage	After claims	07/15/2027	DM	☐

2. Client transitions

Active clients (number)	Need a warm handoff	Referral list updated on	Written notice sent on
38	5 (codes on page 3)	01/04/2027	01/15/2027

Default if a client does not reply by the deadline (what the letter said)
Records stay with custodian K. Ibarra, LPC, in secure storage; copies on request

3. Records plan: where they are now, who holds them after

- ☑ EHR or practice software
- ☑ Paper charts
- ☑ Email and texts
- ☑ Telehealth platform
- ☑ Billing or clearinghouse
- ☐ Scanned or cloud files

Records custodian (name, role, contact)	Keep until (latest client)	BAA or agreement signed
K. Ibarra, LPC (colleague), 555-0142	Latest: 2034 (minor, turns 23)	02/20/2027

How clients request records after closing	Access tested on	Destroy how, and when
Written request to K. Ibarra	03/28/2027	Shred, wipe; after 2034

4. Wind down: tick when done

- ☑ Malpractice tail checked
- ☑ Payers notified
- ☐ Medicare (if enrolled)
- ☑ CAQH updated
- ☐ NPI (after claims)
- ☐ License status
- ☐ Lease, phone, answering
- ☑ Website, directories
- ☐ Bank, taxes, entity

Plan prepared by	Date	Reviewed with (attorney, colleague)	Next check in
D. Marsh, LPC	02/20/2027	R. Feld, attorney; K. Ibarra	Monthly to 06/2027

Keep client names off this page. Track each client on page 3 by initials or code.

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Closing Checklist and Log

Ten checks before the doors close, plus a log of every client notice and records transfer

Before you close, in order

- [ ] 1. Every active client told in session, then in writing, with a date.
- [ ] 2. Higher risk clients have a named receiving clinician and a plan.
- [ ] 3. Referral list checked: open to new clients, right fit, right fees.
- [ ] 4. Former clients reached by mail, website, voicemail or public notice.
- [ ] 5. Every records request answered within 30 days; nothing held back for a balance.
- [ ] 6. Records custodian agreed in writing; BAA in place if a vendor holds data.
- [ ] 7. Final claims, refunds and superbills done; payer contracts ended per terms.
- [ ] 8. Malpractice carrier asked about tail coverage; answer kept in writing.
- [ ] 9. Board, CAQH, Medicare (if enrolled) updated; NPI deactivated after claims.
- [ ] 10. Copies of every notice kept; HIPAA policies kept at least six years.

Client notification and records transfer log

Client code	Told in session	Letter sent, how	Reply or choice	Records to (name)	ROI on file	Sent on	By

Use codes, not names. Note how each notice went (letter, portal, secure email), what the client chose (copy, transfer, stay with custodian), and when records went out. Keep this log with the records for the full retention period.

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