

## **I. Introduction**

Welcome to Risen Consultants, LLC. Risen Consultants values its clients and team members and makes every effort to communicate expectations and support the highest quality service. To that end, the following policies and procedures are provided to orient you, the client, about our company.

Risen Consultants, LLC. was created in 2017 to meet the growing need for effective community-based behavioral services.

Behavior analysts and assistants join the Risen Consultants team as independent contractors. Prior to beginning work with individuals, families, and caregivers they must read and sign “Consultant Agreement” clarifying the expectations and parameters of their role. It is important to understand that the consultants must adhere and abide by all the rules, policies, and regulation requirements of the funding sources and their individual and general requirements. Risen Consultants, LLC. is committed to the science of Applied Behavior Analysis conducted in a home or community setting to bring about positive changes in quality of life. The interventions are rendered directly by a Board-Certified Behavior Analyst (BCBA), Board-Certified Assistant Behavior Analyst (BCaBA) and Registered Behavior Technician (RBT), as needed. The principles by which we operate at Risen Consultants, LLC. are summarized below:

## **II. Mission Statement.**

At Risen Consultants, LLC our mission is to promote the social-emotional development of children and adults in need of behavior analysis and mental health services. To that end, we provide treatment, training, and education that endorses independence and improves the quality of life for individuals dealing with mental health challenges and developmental disabilities. We also encourage caregivers and family members to obtain the necessary skills in behavior analysis that ultimately help our clients achieve their full potential.

## **III. Vision Statement**

As a leader in mental health and behavioral services, we help shape communities that are clinically and culturally empowered by our services to deal with the effects of mental/behavioral disorders and developmental disabilities.

## **IV. Evidence-Based Practices**

### **Policy**

A wide variety of interventions are available for addressing behavioral challenges, in particular for treating children with autism and other developmental disabilities. However, not all of the interventions have scientific evidence to support their use. Risen Consultants, LLC. believes the best practice lies in using only evidence-based interventions.

### **Purpose**

To emphasize the importance of using evidence-based practices in behavior therapy.

### **Procedure**

1. Risen Consultants, LLC only adopts procedures that have a strong theoretical basis, have been subjected to rigorous research, and have been demonstrated to produce observable behavior changes with the individuals who will be receiving services. Such practices have been summarized in that National Standards Report and Risen Guidelines for ASD, the BACB and are articulated through national associations such as the Associations for Applied Behavior Analysis.
2. Families and professionals affiliated with Risen Consultants, LLC. are encouraged to seek empirical support for the strategies being used and new evidence in the scientific research of applied behavior analysis.
3. All interventions are delivered with an appropriate level of intensity (e.g., per Behavior Analyst Certification Board® practice guidelines) and include ongoing measurements of efficacy. The use of these measurement tools and analysis of progress is continuous for every individual, and treatment decisions based on objective analysis of assessment results.
4. No restraints or punishment interventions will be used in the treatment of any client serviced by Risen Consultants, LLC. In cases where Response Blocking is warranted (such as in the presence of self-injurious behaviors), the block will last no longer than 15 seconds and will involve the least physical contact possible. Given the nature of the challenges, individuals who participate in our services face, it is possible for an individual to engage in behavior that puts him/herself or others at risk. Risen Consultants, LLC make every effort to avoid provoking this type of behavior unnecessarily and to respond quickly to address problems as soon as they arise (e.g., through prompting communication, presenting options or assistance, clarifying expectations, or using redirection). If the client has a violent reaction or any type of physical aggression, consultant will remove him/herself from the situation, along with

any other bystander. Consultant will call 911 to request assistance when deemed necessary.

## **V. Engaging Support Providers**

### **Policy**

In order for Risen Consultants, LLC. to have the desired positive impact, everyone who is involved in the client's life must be on the same page. This includes behavior analysts and assistants, parents, teachers, babysitters, therapists, direct service providers, extended family, friends, and anyone else who cares for the individual.

### **Purpose**

To engage all individuals involved with the client's life with the behavioral and personal goals that will be facilitated through therapy.

### **Procedure**

1. Working together requires open communication among all stakeholders, development of plans that make sense and can be utilized everywhere the individual's needs dictate assistance, and the collective effort toward mutual goals and responsibilities.
2. Caregivers must be involved in the assessment and intervention process to the greatest extent possible. This includes:
  - obtaining input through interviews and self-recording of data,
  - collaboratively identifying strategies based on patterns identified (rather than simply developing plans and giving them to the parent or teacher)
  - providing sufficient training so caregivers can fully implement all interventions themselves (e.g. providing a copy of the written plan and providing opportunities for practice and feedback, competency checks to caregivers conducted at least on a monthly basis).

## **VI. Assessing Behavior, Contexts, and Functions**

### **Policy**

Risen Consultants utilizes and adheres to appropriate assessment and reassessment guidelines. A thorough assessment is the foundation of effective intervention. Rather than making decisions based on the symptoms, nature of the problem, or gut instincts, Risen Consultants, LLC gets involved in a behavioral assessment process for gaining an objective understanding about an individual's behavior.

## **Purpose**

To explain and emphasize the importance of an accurate functional behavioral assessments and its benefits in behavioral therapy.

## **Procedure**

1. An accurate understanding of an individual's behavior, circumstances that set the stage for their behavior to occur (antecedents and setting events), and results the behavior produces (functions - what they get or avoid because of the behavior) must precede any intervention.
2. Risen Consultants, LLC. team members – under the direction of the contracted behavior analyst – complete record reviews, interviews, and direct observations across circumstances in which the individual participates.
3. Risen Consultants, LLC team members may also conduct preference, ecological, and curricular assessments to evaluate the person's needs, current skills, and environmental features that may affect intervention.

### Assessments/Reassessments:

Time intervals for performing reassessments are according to:

- Authorization for services.
- Medical Necessity.
- Reassessments will be conducted at least once a year.
- Assessment data gathered will be used to assess the client's needs and problems initially and on an ongoing basis.

### Parameters of Assessment for Each Category of Personnel:

- The BCBA will perform the initial assessment for clients with the collaboration of caregivers and staff. Reassessments may be conducted by BCaBA and Licensed Professionals under the supervision of the BCBAs.

### Qualifications of Staff:

- Each client assessment and reassessment will be completed by the appropriate staff, whose qualifications are defined in RISEN CONSULTANTS's job descriptions and which adheres to federal and/or state licensure laws, applicable regulations registration and/or certification.

### Communication:

- If assessments and interventions (e.g., diagnostic, medical, behavioral) have been conducted previously, Risen Consultants, LLC. will request records to streamline and enhance their services, with proper releases previously signed.

- Pertinent assessment and reassessment data will be communicated to team members, client and the client’s caregivers, PCP/Neurologist and other behavioral health providers can be notified in writing, with client’s release.
- Assessment will be placed in the treatment record, accessible to all staff working with the client, INCluding non-behavioral staff. A copy of the assessment will be provided to family members as a reference for goals and expectations.

## **VII. Comprehensive, Individualized Intervention**

### **Policy**

Interventions developed based on a thorough assessment INCorporate multiple components focused on improving behavior and quality of life. The emphasis should be on teaching, rather than just controlling behavior (for every problem behavior reduced, we focus on INcreasing some other socially significant behavior).

### **Purpose**

To explain the emphasis of behavioral treatment plans and their goals.

### **Procedure**

The elements of Risen Consultants, LLC. behavior support plans INClude:

1. Prevention: modifying aspects of the environment to avoid problems, make difficult circumstances better, or add cues to prompt more adaptive behaviors.
2. Teaching: building skills to help the individual communicate his or her needs, interact with other people, deal with unpleasant circumstances, or become more self-sufficient.
3. Management: providing consequences that reinforce positive behavior and withhold outcomes (e.g., reactions, results) that may be desirable to individuals when engaging in problem behavior.
4. To provide with an individualized approach, RISEN CONSULTANTS team members may engage consumers, their family members, and service providers in a person-centered planning process to identify desired outcomes, ensure that the support strategies are geared to meeting those goals, and overcome any barriers to an individual's success. For example, RISEN CONSULTANTS may assist in structuring routines and settings in order to work on skills to facilitate friendship development, self-management, and independence in daily life.
5. Plans are developed by BCBA/Licensed Professional and approved ultimately by Clinical Director (BCBA). Updates and reviews to the plan are conducted according

to client's needs and Insurance authorization periods. At least once a year, plan is updated and reviewed with client and caregivers, usually every six months.

## **VIII. Data-Based Decision Making**

### **Policy**

The effectiveness of behavioral interventions is measured in terms of the degree to which problem behaviors are reduced and positive behavior is INCreased. To achieve desirable outcomes, behavior plans must be implemented consistently and completely.

### **Purpose**

To describe the importance of consistent service and accurate data collection.

### **Procedure**

1. Risen Consultants, LLC. contractors collect behavioral data on an ongoing basis and display it using progress notes and graphs.
2. Service providers must communicate regularly with the individual receiving services, their caregivers, and other service providers collecting data simultaneously with other recorders to make sure the information is accurate and reliable, Interobserver Agreement (IOA) is checked weekly and should be above 90%.
3. Collaborative data is used to make decisions regarding treatment, prepare reports on outcomes, and communicate with consumers, funders, and regulatory bodies.
4. Treatment plan goals are developed based on data collected. Baseline reflect level of performance without treatment. Objective and measurable goals for treatment (Short term and Long-term goals) are defined with time frame and mastery criteria.
5. Goals that are not accomplished within the expected time frame, values that remain in the same levels for two consecutive months, are entitled for revision and discussion about barriers and potential procedure changes.
6. The integrity with which interventions are utilized is assessed through direct observations, interviews, and checklists.
7. Through these assessments, Risen Consultants, LLC. determines whether recommended procedures are being implemented as designed and are appropriate for the individual and the environments in which he or she participates.

## **IX. Service Time Policy**

### **Policy**

Therapy service hours will be agreed upon with client and caregivers. Hours agreed upon shall normally be at any time between 7:00 AM to 9:00 PM any day from Monday through Sunday, depending on client's necessity.

### **Purpose**

This procedure is intended to define a clear schedule of services for clients, their caregivers, and service providers affiliated with RISEN CONSULTANTS, LLC.

### **Related Documents**

A.3 "Service Time Agreement" form.

### **Procedure**

1. Hours of service will be scheduled with client prior to starting therapies and/or services.
2. In the event therapies were to be given on a different time, they will be agreed upon by both the client, their caregivers and therapist.
3. If service provider has to miss a previously agreed-upon behavioral service session for non-business related reasons during their normal work schedule, he/she should inform his/her immediate Manager as well as their client and caregiver.
4. Initial Assessment and assignment of therapists to clients is expected to occur within the first 15 days after Authorization is obtained. If the volume of recipients makes necessary to create a waiting list, caregivers and recipients will be notified and informed about other providers that might be available, to offer other choices for the clients.
5. It is the responsibility of both therapist and consumer to inform when a scheduled session is not going to take place. Cancellations may be notified at least 24 hours before the appointment. RISEN CONSULTANTS do not charge for no shows or cancellations. Therefore, therapists are encouraged to confirm their appointments in advance.

## **X. Service Provider Vacation and Personal Time Off**

### **Policy**

At Risen Consultants, LLC., consultants agree to communicate with consumer(s) and/or caregiver(s) in regards to requests for vacation and personal time off. The time off must be convenient for the consumer(s) and/or caregiver(s) and/or must work with their schedule.

### **Purpose**

To provide clients and their legal guardians with clear procedures when their primary service provider requests vacation/ time off and they want to request a substitute consultant.

### **Procedure**

1. If the consumer(s) and/or caregiver(s) wish to continue the services during the vacation and/or time off, they can request that the consultant find a substitute consultant during the time they will not be able to provide the services.
2. If the consumer(s) and/or caregiver(s) is requesting a substitute Consultant, then Consultant must either find a substitute Consultant for coverage or make a request to Risen Consultants, LLC. at a minimum of thirty (30) days prior to the requested time off.
3. This procedure will allow Risen Consultants, LLC. to find a qualified substitute for the vacation time and/or requested time off. Risen Consultants, LLC has a database of substitute Consultants which are properly qualified to provide these services. This allows Risen Consultants, LLC. to obtain a substitute Consultants promptly upon request of the Consultant to Risen Consultants, LLC.
4. The substitute Consultant must work for Risen Consultants, LLC. in order to assure that funding source confidentiality and requirement guidelines are adequately met.



## **XI. Personal Outcome Progress and Measures**

### **Policy**

Risen Consultants treatment process involves person-centered approach and planning that will be provided to meet the needs of the clients being served by using an interview process of PATH (Planning Alternative Tomorrows with Hope), which is a visual process of behavioral goal planning. We also work with all providers, parents/guardians and other natural supports that focus on the client to develop both behavioral and personal goals outlined in the support plan that will lead to quality implementation of our behavior plans and achieve personal goals outlined in said plan.

### **Purpose**

To outline a clear and concise process of measuring progress while treatment is active.

### **Procedure**

1. Any person-centered planning process that is completed by Risen Consultants, LLC. is linked to the support/ behavior plan developed by the lead analyst and we use the support plan as our starting place to focus our person-centered efforts.
2. Once goals have been established, a specific behavior plan will be implemented, trained, followed and monitored through the use of progress notes, quarterly summaries, graphs, and meeting and regular communication with the support coordinator.
3. We use data collected by servicing providers and caregivers to evaluate the progress we have made on our behavioral goals.
4. Risen Consultants, LLC. establishes direct connections between resources, program goals, and personal outcomes identified by the consumer and/or family. We focus on the items and issues that matter most to people's lives. We try to remember that personal outcomes apply to the whole person across services and settings.
5. Risen Consultants, LLC. assists individuals with identifying a view for the future and personal dreams. We discuss the spiritual needs of our clients related to behavioral care in order to keep a compassionate approach as the foundation to every interaction.
6. We also remind clients of their right to make informed choices, and take responsibility for those choices and related risks. The individually determined goals and aspirations of the people we support are of the utmost importance when we plan, design and deliver services.

**Identity**

People choose personal goals.

People choose where and with whom they live.

People choose where they work.

People have intimate relationships.

People are satisfied with services.

People are respected and treated regardless of religious or cultural background.

People are satisfied with their personal life situations.

**Autonomy**

People choose their daily routine.

People have time, space and opportunity for privacy.

People decide when to share personal information.

People use their environments.

**Affiliation**

People live in integrated environments.

**People participate in spiritual/religious activity of desire.**

People participate in the life of the community.

People interact with other member of the community.

People perform different social roles.

People have friends.

People are respected.

**Safeguards**

People are connected to natural support networks.

People are safe.

**Rights**

People exercise rights.

People are treated fairly.

**Health and Wellness**

People have the best possible health.

People are free from abuse and neglect.

People experience continuity and security.

## **XII. Rights, Responsibilities and Ethics of Individuals Served**

### **Policy**

Risen Consultants, LLC will provide each client and/or caregiver with a written notice of the client's rights in advance of the start of services or during the initial evaluation visit before the initiation of treatment.

### **Purpose**

This procedure is intended to define and preserve the rights and responsibilities of all individuals served by Risen Consultants, LLC.

These rights and responsibilities are guaranteed under Local, State and Federal law and will be adhered to by all staff members and individuals served.

### **Related Documents**

A.1 "Client's Bill of Rights and Responsibilities" form

### **Procedure**

1. The rights and responsibilities of any person who is a client or receives services from our agency will be discussed both verbally and in writing as follows:

- **The Right to Dignity, Privacy, and Humane Care**
  - Be treated in a fair way.
  - Be treated with respect.
  - Not be subjected to physical or verbal abuse including teasing and name-calling.
  - Access to community/social activities.
  - Access to recreational activities and hobbies.
  - Having someone to love.
  - Choosing where to live and with whom.
  - Get married.
  - Have children
  - Control of personal finances and access to education on wise spending.
  - Control over personal property.
  - Confidentiality of client's medical record as well as information about their health, social and financial circumstances and about what takes place in the home.
  - Right to leisure activities of choice.
- **Responsibility to Respect Other's Rights**
  - Not engaging in actions that negate or violate other people's rights.
  - Act responsibly.

- **Right to Lawful Service**
  - Not be discriminated against due to gender, ethnicity, race, religious affiliation, religious practices, or any disability.
  - Receive fair wages.
  - Receive the same benefits, options, and opportunities as others engaged in the same jobs (for example: coffee and lunch breaks, medical benefits, vacation time and maternity leave)
  - Receive the same medical services and care as others.
- **Unrestricted Right to Communication and Self-Expression**
  - Speak openly and give their opinions both in person and through other channels of communication.
  - Talk about rights.
  - Show personal feelings.
  - Make complaints and voice client's or guardian's grievances without fear of discrimination or reprisal for having done so.
  - Have complaints investigated made by the client, client's family or guardian regarding treatment or care that is (or fails to be) provided, or regarding the lack of respect for client's property by anyone providing services on behalf of RISEN CONSULTANTS, LLC. Client will not be subject to discrimination for doing so. RISEN CONSULTANTS, LLC must document both the existence of the complaint and the resolution of the complaint.
  - Be notified in advance about the services that will be provided, any changes to said services, the types of the caregivers who will provide the care and the frequency of the visits that are proposed to be given.
  - Say "no."
  - Disagree with people.
  - Have people listen when one speaks.
  - Have people try to understand when one speaks.
- **Right to Privacy**
  - Spend time alone, if desired.
  - Require consent from others to inspect personal property (for example: people having to receive direct consent to look in personal locker at work).
  - Require consent from others to enter personal space (for example: have people knock before entering private quarters).
  - Use the telephone and other means of communication privately.

- **Right to Access**
  - Access to community services.
  - Access to special (accessible) transportation if required.
  - Access to seating for disabled persons on regular transportation if required. Get around easier/ with accessibility if they use a wheelchair (for example: ramps, curbs cuts).
  - Be part of and have access to the community (such as jobs and recreation).
  - Access to schools and educational facilities in order to receive necessary or desired training.
- **Right to Best Service Practices**
  - Have effective and dependable service providers.
  - Being helped and provided with designated services without additional delay (for example: receiving help when it's one's turn in line).
  - Receiving the same service as everyone else.
  - Asking and receiving answers to questions if clarification or more information is required.
  - Change service provider.
  - Receive a second opinion from another doctor.
  - Have service providers explain medical opinions, reasoning for procedures, costs, and potential future outcomes directly (not just to their parents, staff or others).
  - Refusing any kind of behavioral services or otherwise provided by RISEN CONSULTANTS, LLC.
  - Being treated gently if receiving medical care.
- **Right to Support**
  - Get help, if required, with thing such a finding a place to live, making a budget, and obtaining necessary education.
  - Have supports that provide good treatment (kind, polite, and respectful).
  - Have supports who are helpful.
  - Not be verbally or physically assaulted by supports or any other individual.
  - To be told positive, not solely negative things about oneself from supporters.
  - Have enough money to attain the services and support one's needs
  - Receive help with making decisions, if necessary.
  - Receive help with taking care of money, if necessary.
  - Have a say in decisions even if help is required.

- **Right to Make Informed Choices and Decisions in Own Life**
  - Making decisions and choices based on feelings, beliefs and personal ideas.
  - Being informed enough to make an educated decision.
  - Taking chances (risks) once potential consequences are known and explained.
  - Deciding how one plans for one's future (for example: choosing what goals are set and what concerns are touched upon when planning).
  - Choosing to live alone or with others.
  - Having choices when using services, INCLUDING where to live, who to live with, what to eat, what changes occur to one's home, what work one does, when one goes to the bathroom, what doctor one goes to, what one's doctor does, and many other personal choices.
  - Making mistakes.
  - Changing one's mind.
  - Deciding to stop using a service.
  - Choosing when support is needed.
- **Right to Safety and Protection**
  - Feel safe when using services
  - Feel safe when out in the community.
  - Not be hurt, attacked or have personal items taken.
- **Responsibilities to:**
  - Pursue healthy lifestyles known to promote positive health results, such as proper diet and nutrition, adequate rest, and regular exercise.
  - Become knowledgeable about their behavior plans. Clients/Caregivers should become familiar with the terms, goals and strategies outlined in behavior plans. They should not be hesitant to inquire providers when additional information or clarification is needed.
  - Actively participate in decisions about their course of treatment. Clients/Caregivers should provide accurate information to providers regarding their medical and personal histories, and current symptoms and conditions. They should ask questions of providers to determine the potential risks and benefits of treatment alternatives. Additionally, clients should also seek and read literature

about their conditions and weigh all pertinent factors in making informed decisions about their care.

- Involvement on mutually accepted care and courses of treatment. Clients/Parents must cooperate fully with providers in complying with mutually accepted treatment strategies and regularly reporting on treatment progress. If serious side effects, complications, or worsening of the condition occur, they should notify their providers promptly. They should also inform providers of other medications and treatments they are pursuing simultaneously.
  - Clients/ Parents are responsible for their actions and any effects it may have, if treatment is refused or do not follow, as outlined.
  - Caregivers are aware that their involvement is part of the treatment as a way to promote generalization and maintenance of gains.
2. Risen Consultants, LLC maintains documentation in the client's medical record demonstrating compliance with informing client about rights and responsibilities.
  3. The Bill of Rights is shared with clients and parents and/or service recipients at the time of intake and annually, obtaining signatures to indicate the person's acknowledgement and understanding.
  4. Risen Consultants conducts monthly caregiver training and competency checks to evaluate caregivers' proficiency in behavioral interventions. When caregiver is not available to participate in sessions for two consecutive trainings or competency checks, they will be notified and reminded about the risks in client's progress. If caregiver continues failing to comply with the treatment recommendations, services may be terminated and insurance carrier notified.

## **XIII. Consents**

### **Policy**

Clients and family members will participate in the applied behavior analysis plan of care, as well as planning for transfer, referral or discharge.

The client will receive information regarding his/her condition, technical procedures and benefits and effects of the procedure. All client's legal guardians and/or caregivers will sign giving consent for Risen Consultants, LLC to evaluate and treat clients.

### **Purpose**

To inform the client and their caregivers or legal guardians of risks/benefits associated with any care provided in the home.

### **Related Documents**

A.4 "Client Consent for Services, Treatment, Behavior Plan, and Cancellation" form.

### **Procedure**

1. All care provided by RISEN CONSULTANTS, LLC requires consent for care.
2. At time of initial assessment, the servicing provider affiliated with RISEN CONSULTANTS, LLC will obtain consent for services, treatment, behavior plan, and cancellation.
3. If client (and legal guardians) agree with proposed care and treatment plan, the client or their legal guardian will be asked to sign the consent form.
  - A surrogate decision maker may give consent if:
    - Client is under 18 years of age
    - Client is not physically able to sign form.
    - Client has been judged mentally incompetent.
    - Client requests that surrogate decision maker sign consent.
4. The consent form will be included in the client's medical record and renewed annually.
5. At time of initial assessment and on an ongoing basis, each client and their guardians will be informed of the names of the staff members responsible for care and the names of the staff members providing services.
6. At the time of the initial assessment, each client will be informed orally and in writing of payment responsibility (if any). The client will also be informed orally and in writing on an ongoing basis of changes in payment responsibility, but no later than five (5) calendar days from the date that RISEN CONSULTANTS, LLC becomes aware of the change.



## **Consent for Filming or Recording**

### **Policy**

Risen Consultants, LLC requires client or legal guardian consent when filming or recording is to be used for any purpose. Filming and recording include photography, video, audio and/or electronic media.

### **Purpose**

To define the process for consent for filming or recording.

### **Related Documents**

A.5 “Consent for media recording” form

### **Procedure**

1. When a client is to be filmed or recorded for any purpose, the client and/or legal guardian will be required to give consent.
  - The consent will be documented.
  - The purpose of the filming or recording will be documented.
2. Consent must be obtained prior to the filming or recording.

If consent is not obtained, the film or recording cannot take place.
3. The client will be informed of specific rights:
  - The client has the right to request cessation of filming or recording.
  - The client has the right to rescind consent for up to a reasonable time before the film or recording is used.
5. External persons (not employees of Risen Consultants, LLC) who engage in filming or recording a client must sign a confidentiality statement to protect the client’s identity and confidential information.

## **XIV. Retention of Records**

### **Policy**

It is the policy of Risen Consultants, LLC to maintain the individual’s central record in a confidential and secure manner.

### **Purpose**

To safeguard all client records with a clear procedure of how to handle all records kept while services are active and in archives.

### **Procedure**

1. An individual record will be maintained by the agency for all individuals receiving services from Risen Consultants, LLC.
2. The file of any individual client will be filed inside locked file cabinets or an electronically encrypted hard drive.
3. Each client record page will have an identifying case number that's internal for the agency and can be accessed through the database to obtain the insurance ID. Each client record page will also specify the provider and their license information, if applicable.
4. During the service period, the client's file will be taken out every month to add monthly reports and pertinent documents. The agency representative is responsible for every file revision and actualization, as well as for returning it safely to the locked file cabinet. No more than 3 files will be out of the central agency's filing station at one time.
5. Upon transfer or closure of a case the individual record will be taken to the Storage Unit which is under lock.
6. The client records will be retained for the duration of the services provided by this agency. The central records will be "thinned" out once a year. The removed documents will be stored in a sealed large manila envelope with the individual's name, date of birth, and Service Period being documented on the outside of the envelope. All central records will be kept at Risen Consultants, LLC. The removed documents will be stored in a storage unit.
7. While legal guardians may request to see the central record, the client/guardian must give written consent for a third party to view the central record.

## **XV. Privacy of Information Policies**

### **Policy**

Individuals receiving services through Risen Consultants, LLC. are asked to provide information about their children, families, or programs that they may not want shared elsewhere. In addition, team members may share private information in writing or via documentation. Risen Consultants, LLC. team members must safeguard all personally identifiable documentation, including individual records and data, meeting notes, personnel files, and administrative records related to the business or agency as required by State and Federal laws.

### **Purpose**

To safeguard all client information given to Risen Consultants, LLC in any form, be it written or verbal.

### **Related Documents**

A.2 "Fax Coversheet" form.

### **Procedure**

Risen Consultants, Inc. / 2018 Client Policy & Procedures Handbook

## 1. Our Legal Duties

- State and federal laws require that we provide all persons affiliated with our company with this notice informing them of our privacy of information policies, their rights, duties to help protect the privacy of all clients and their families. We are required to abide these policies until replaced or revised.
- We have the right to revise our privacy policies for all medical records including records kept before policy changes were made.
- Any changes in this notice will be made available upon request before changes take place.

## 2. Use of Information

- Private information about clients may be used by the personnel affiliated with Risen Consultants, LLC. for diagnosis, treatment planning, treatment, and continuity of care.
- We may disclose this information to health care providers who care for the same client such as doctors, nurses, mental health professionals, mental health students, and other business associates affiliated with Risen Consultants, LLC such as billing, quality enhancement, training, audits, and accreditation.
- However, disclosure of this information will only occur in a need-to-know basis as indicated in HIPAA guidelines.
- Both verbal information and written records about a client cannot be shared with another party without their written consent or their legal guardian's or personal representative.
- Information about clients may be disclosed in consultations with other professionals in order to provide the best possible treatment. In such cases the name of the client, or any identifying information, is not disclosed. Clinical information about the client is discussed. Some progress notes and reports are dictated/typed within the Risen Consultants, LLC. or by outside sources specializing in (and held accountable for) such procedures.
- In the event in which Risen Consultants, LLC. or the BA professional must telephone the client for purposes such as appointment cancellations or reminders, or to give/receive other information, efforts are made to preserve confidentiality. Clients are to notify us in writing whether we may reach them by phone and how they would like us to identify ourselves. For example, they might request that when we phone them at home or work, we do not say the name of Risen Consultants,

LLC. or the nature of the call but rather the mental health professional's first name only. If this information is not provided to us, we will adhere to the following procedure when making phone calls: First we will ask to speak to the client (or guardian) without identifying the name of Risen Consultants, LLC. If the person answering the phone asks for more identifying information we will say that it is a personal call. We will not identify Risen Consultants, LLC. (to protect confidentiality). If we reach an answering machine or voicemail we will follow the same guidelines.

- For fax communications, RISEN CONSULTANTS staff will ensure that the Coversheet is clearly marked "Confidential", when clinical records are displayed.
- Client/ Legal Guardian/ Parent Rights to Information
  - Clients and their legal guardians or parents have the right to request to review or receive a client's medical files. The procedure for obtaining a copy of a client's medical information is as follows: an authorized person may request a copy of a client's records in writing with an original (not photocopied) signature. If the request is denied, the requestor will receive a written explanation of the denial. Records for non-emancipated minors must be requested by their custodial parents or legal guardians. The charge for this service is up to \$1.00 per page, plus postage.
  - Clients and their legal guardians or parents have the right to cancel a release of information by providing us a written notice. If a client desires to have their information sent to a location different than our address on file, they must provide this information in writing.
  - Clients and their legal guardians or parents have the right to restrict which information might be disclosed to others. However, if we do not agree with these restrictions, we are not bound to abide by them.
  - Clients and their legal guardians or parents have the right to request that information about the client be communicated by other means or to another location. This request must be made to us in writing.
  - Clients and their legal guardians or parents have the right to disagree with the medical records in our files. They may request that this information be changed. Although we might deny changing the record, clients have the right to make a statement of disagreement, which will be placed in their respective file.
  - Clients and their legal guardians or parents have the right to know what information in their record has been provided to whom. Request this in writing.

- If a client and their legal guardian/parent desires a written copy of this notice, they may obtain it by requesting it from Risen Consultants, LLC. director, Eloisa Arandia.
- It is the policy of Risen Consultants, LLC. not to release any information about a client without a signed release of information except in certain emergency situations or exceptions in which client information can be disclosed to others without written consent. Some of these situations are noted below, and there may be other provisions provided by legal requirements.
  - **Duty to Warn and Protect**

When a client discloses intentions or a plan to harm another person or persons, the health care professional is required to warn the intended victim and report this information to legal authorities. In cases in which the client discloses or implies a plan for suicide, the health care professional is required to notify legal authorities and make reasonable attempts to notify the client's family.
  - **Public Safety**

Health records may be released for the public interest and safety for public health activities, judicial and administrative proceedings, law enforcement purposes, serious threats to public safety, essential government functions, military, and when complying with worker's compensation laws.

Discussions regarding any person or persons in public or the presence of non-titled recipients is deemed inappropriate and in violation of this policy. This policy holds true with the use of social media. Contractors will refrain from taking photos of clients, "friending" clients on facebook, etc. The President of Risen Consultants, LLC., Humberto Mena, is the legal custodian of agency records and must give prior approval of the release of any information, with the exception of program participant records released to qualified recipients. All records are kept confidential via locked file cabinets and an encrypted password-protected on-line computer system.
  - **Abuse**

If a client states or suggests that he or she (1) is abusing a child or vulnerable adult, (2) has recently abused a child or disabled adult, or a disabled child or adult or (3) is in danger of abuse, the health care professional is required to report this information to the appropriate social service and/or legal authorities. If a client is the victim of abuse, neglect, violence, or a crime victim, and their safety appears to be at risk, RISEN CONSULTANTS may

share this information with law enforcement officials to help prevent future occurrences and capture the perpetrator.

- **Prenatal Exposure to Controlled Substances**

Health care professionals are required to report admitted prenatal exposure to controlled substances that are potentially harmful to the fetus.

- **In the Event of a Client's Death**

In the event of a client's death, the spouse or parents of a deceased client have the right to access their child's or spouse's records.

- **Professional Misconduct**

Professional misconduct by a health care professional must be reported by other health care professionals. In cases in which a professional or legal disciplinary meeting is being held regarding the health care professional's actions, related records may be released in order to substantiate disciplinary concerns.

- **Judicial or Administrative Proceedings**

Health care professionals are required to release records of clients when a court order has been placed.

- **Minors/Guardianship**

Parents or legal guardians of non-emancipated minor clients have the right to access the client's records.

- **Other Provisions**

When payment for services are the responsibility of the client, or a person who has agreed to providing payment, and payment has not been made in a timely manner, collection agencies may be utilized in collecting unpaid debts. The specific content of the services (e.g., diagnosis, treatment plan, progress notes, testing) is not disclosed. If a debt remains unpaid it may be reported to credit agencies, and the client's credit report may state the amount owed, the time-frame, and the name of Risen Consultants, LLC., or collection source. Insurance companies, managed care, and other third-party payers are given information that they request regarding services to the client. Information which may be requested includes type of services, dates/times of services, diagnosis, treatment plan, description of impairment, progress of therapy, and summaries.

# 1. Grievance Policy

## Policy

Written grievance procedures will be used to resolve conflicts, which may arise between the client, family, and/or guardian and the service provider. These procedures do not preempt the individual, family, and guardian's right to request a change in services and/or Provider or request a meeting to discuss other issues of concern.

## Purpose

To provide for a prompt and equitable manner to file complaints and grievances by clients.

## Procedure

1. The individual initiating the complaint will complete the Grievance Form (see below). If the individual is not able to write, the verbal complaint will be written for the individual by direct care staff, the individual's family, legal guardian, friend or other advocate. The grievance form will contain the following information:

- a. The name of the individual initiating the complaint and relationship to the client receiving services.
- b. The date the complaint was received.
- c. A clear description of the complaint.

2. All complaints will be retained in the client's file with a copy contained in the grievance log. The grievance log will be kept up to date in the office of Risen Consultants, LLC.

3. Upon notification of a grievance, the direct supervisor of the case (lead analyst) of Risen Consultants, LLC. will investigate the facts/issues and attempt to resolve the grievance in a timely fashion.

4. If the issue cannot be resolved at this level, the grievance will be directed to the Board of Directors of Risen Consultants.

5. Response to grievances will be provided verbally and in writing on the grievance form within 7 days of the complaint being received.

# 2. Grievance Procedure and Log

## Policy

The following Grievance Procedure will be utilized when conflicts arise between the individual/family/provider and agency. A grievance letter will be signed upon admission and annually during the consumer support plan. The grievance letter will be explained to the consumer, guardian, family and/or advocate. Their signature will indicate they have received a copy of Risen Consultants, LLC. Grievance letter and were informed of their rights under the grievance procedure.

**Purpose**

To provide for a prompt and equitable manner to log and follow-up complaints and grievances by clients.

**Related Documents**

A.6 “Client Complaint / Grievance Tracking Log”

**Procedure**

Risen Consultants, LLC. will log all complaint of consumer, guardian, family and/or advocate in their grievance log. The log will have the complainant name and their relationship to the client. Risen Consultants, LLC. will log the date the complaint was received. A clear description of the complainant grievance will be logged. After both parties resolve the situation, the date of the final disposition will be logged in the grievance log. Based on who the Grievance Procedure is being explained to, staff will review the procedure in clear and basic language with the client and their guardian.

## **XVI. Complaint and Grievance Resolution**

**Policy**

To provide for a prompt and equitable resolution of complaints by clients.

**Purpose**

To provide a mechanism for use by the client or their legal guardian to assure response, and, if possible, resolution of a complaint in a timely manner. To provide administrative persons an opportunity to review responses to complaints as indicated.

**Procedure**

1. At admission each client is informed regarding steps to take if he/she has any concerns related to services provided by RISEN CONSULTANTS, LLC and client safety issues.
2. A client complaint may be formal or informal and in writing or verbal. The complaint may be made to any Risen Consultants employee, volunteer or individual providing services under arrangement. The complaint may be made by the client or their legal guardian.
3. Clients and their guardians are encouraged to make suggestions for improving care and/or register complaints to RISEN CONSULTANTS, LLC without fear of coercion, discrimination or reprisal for doing so or unreasonable interruption of services.
  - RISEN CONSULTANTS, LLC will investigate complaints made by a client, client’s family or guardian regarding service that is (or fails to be) provided.



- RISEN CONSULTANTS, LLC will investigate complaints made regarding a lack of respect for the client’s property by anyone providing services on behalf of RISEN CONSULTANTS, LLC.
  - RISEN CONSULTANTS, LLC will document both the existence and the resolution (or attempts at resolution) of the complaint. This documentation will be kept confidential, in a file titled “Complaints.”
4. The designated individual to respond to and take action to resolve complaints is the direct supervisor in a case-by-case basis.
    - Intake information is obtained from the appropriate sources.
    - Investigative measures will be implemented based on the nature of the complaint.
    - Appropriate authorities are informed as applicable.
    - Corrective action is specific and directly related to the complaint.
    - Client and family rights are protected.
    - Complaint resolution is achieved in accordance with established time frames.
    - Complaints are logged, tracked and trended.
  5. Should the client not receive a positive response to complaints or grievances within 7 business days, the client is encouraged to speak to the Board of Directors of RISEN CONSULTANTS, LLC. The client will receive a response within three (3) business days.
  6. If at the time of response, the client or their legal guardian still feels like their concerns have not been addressed, they have the right to seek legal advice or transferring to a different service provider/ agency altogether.

## **XVII. Client Admission Criteria**

### **POLICY**

Clients are accepted for treatment on the basis of a reasonable expectation that the client’s needs can be met adequately by RISEN CONSULTANTS in the client’s place of residence or other setting where service is needed such as school, Adult Day Training Program, etc. Client will be accepted for care only if RISEN CONSULTANTS can meet a client’s identified needs.

### **PURPOSE**

To establish criteria for the admission of client to RISEN CONSULTANTS.

## PROCEDURE

### 1. Criteria for admission are:

- The client must reside within RISEN CONSULTANTS's service area.
- The client must be entitled to receive covered ABA/Behavior Analysis services under any funding source.
- Client has a diagnosis such as ASD that justifies the need of services.

### 2. RISEN CONSULTANTS admits a client after considering at least the following information:

- Diagnosis letter provided by client's Neurologist, PCP or Psychiatrist.
- Referral for ABA/Behavior Analysis services due to medical necessity.
- Current clinically relevant information supporting diagnoses.

### 3. RISEN CONSULTANTS will not deny admission to client with communicable disease, including, but not limited to, HIV, MRSA, TB and Hepatitis B.

### 4. After Authorization from funding source, care follows a written assessment and behavior plan elaborated by the Lead Analyst and reviewed at least every six months. Care will continue under the general supervision of the Clinical Director.

### 5. Care will be available to all clients who can benefit regardless of race, color, religion, national origin, sex, sexual preference, disability, age, socioeconomic level, marital status, source of payment or diagnostic status. Information to be gathered to determine eligibility includes:

- RISEN CONSULTANTS has resources to provide the services required by the client.
- Attitudes of the client and family toward care are appropriate.
- Qualified personnel to provide needed services are available.
- Reasonable expectations that the client's needs can be met adequately.
- Care can be provided safely and effectively in the client's home or setting where the behavior modification interventions are needed.
- Adequate physical facilities for proper care exist in the client's place of service.
- Family or caregiver is available, able and willing to participate in the client's care when conditions warrant.

### 6. When a telephone or verbal referral is received by RISEN CONSULTANTS, an intake/admission form is completed by RISEN CONSULTANTS staff. Referrals may also be received by fax, in person or in the mail. The referral form includes at least the following information from the attending physician:

- Client identification information, e.g., name, address, telephone number, date of birth, sex, Medicare or social security number, insurance information, emergency contact and telephone number.
- Physician's name, address and telephone number.

- Referral source.
- Recommendation to receive ABA/ Behavior Analysis services.
- Current medical findings supporting diagnosis.

7. Each referral is evaluated by the Manager of Client Services and/or Director to determine the appropriateness of RISEN CONSULTANTS care.

8. During the initial assessment, the Lead Analyst will:

- Perform initial assessment interview, indirect assessments and observations.
- Provide information relevant to risks and benefits of services to be provided so that client/caregiver can give consent.
- Obtain the client's signature on the consent and other required forms.
- Verify the information on the referral form.
- Explain and provide a copy of the *Client's Bill of Rights/Responsibilities*.
- Provide a copy of the HIPAA Privacy Notice.
- Provide information of RISEN CONSULTANTS' scope of services, mission statement, office hours and how to access system.
- Discuss emergency operations plan with the client/caregiver.
- Explain the client's liability for payment of services. Give the client in writing his/her expected payment responsibility.
- Refer client to other disciplines, as appropriate.
- Obtain past medical information, as appropriate.
- Submit the completed admission paperwork to the Manager of Client Services or the Director for review.
- Once the initial assessment and plan is completed, case is assigned to the Lead Analyst (BCBA/Licensed Professional) and paraprofessionals under supervision (BCaBA/RBT) to initiate authorized services.

9. A log of all referrals received is maintained by RISEN CONSULTANTS.

10. If RISEN CONSULTANTS is not able to provide the needed care, the referral source will be notified. RISEN CONSULTANTS will assist the referral source in alternative care.

## **XVIII. Community Resources**

### **POLICY**

RISEN CONSULTANTS will provide information to clients regarding resources available throughout the community.

### **PURPOSE**

To assure that the client/caregiver has accessibility to available community resources and services to meet ongoing health care needs.

### **PROCEDURE**

1. RISEN CONSULTANTS maintains a current list of community resources, services providers and telephone numbers.
2. RISEN CONSULTANTS staff will provide education to the client/caregiver on how to access and utilize services available within the community.
3. Staff is educated during orientation and on an ongoing basis about community resources and the location of the listing of community resources.

## **XIX. Discharge and Transition Policy**

### **Policy**

Risen Consultants, LLC. provides direct training to the individuals and their caregivers who will be ultimately implementing the strategies to maintain behavior change. As they become progressively more independent (and problem behaviors are eliminated or reduced to acceptable levels), Risen Consultants, LLC. fades their services, transfers responsibilities to other providers, and shifts to more natural, community-based supports. Risen Consultants, LLC. contractors work to ensure a smooth transition through attending a transition plan meeting with caregivers as well as providing necessary records.

### **Purpose**

To provide with a clear and concise transition/ discharge plan for clients and their caregivers following fading or termination of services.

### **Procedure**

- Risen Consultants, LLC. does not abandon individuals and will work with physicians, educators, caregivers and other behavioral providers to ensure that services continue if Risen Consultants, LLC. cannot meet a recipient's needs for whatever reason (e.g., during vacations).
- If a contractor is unable to maintain a consistent schedule (e.g., does not see an individual for a month due to illness or scheduling conflicts), he or she will contact Risen Consultants, LLC. administration.
- Risen Consultants, LLC. administration will prepare backup personnel to temporarily/permanently substitute the current staff. This is an individualized process and will be organized case by case, as needed.
- Risen Consultants, LLC. is responsible for providing high quality and effective services. Therefore, Risen Consultants, LLC. reserves the right to discontinue or discharge treatment in the instances of:
  - Individual achieves all of his or her established goals, functional impairment expressed through behaviors is mild or no longer present and the parent or

caregiver agrees that graduation from services is warranted. Plan is created with a discharge planning as an ultimate goal.

- The treatment warrants a different level of care.
- Parent or primary caregiver refuses to follow the mutually agreed upon treatment plan after repeated reminders and attempts to resolve barriers to implementation.
- Individual ages out of coverage (e.g., 21 years of age and no longer enrolled in school).

*Note:* this applies to ABA therapy through Medicaid only.

- Individual is not achieving the goals of treatment despite exhaustion of all known interventions, procedures, and research-based strategies.
  - RISEN CONSULTANTS becomes unable to meet the client's needs.
  - A determination is made that the continuance of services is inappropriate.
  - Client will move out of service area.
  - Risen Consultants, LLC. staff becomes aware of circumstances (e.g., drug abuse, illegal activities, and hostile behavior of caregivers) that may place them at risk.
  - Individual, parent, or guardian decides to terminate services for any reason or request transfer to another provider.
  - If an individual requires support outside the scope of our services.
  - If client cannot be safely treated at their current level of care secondary to homicidal or suicidal risk.
- If a client is discharged from Risen Consultants, LLC or it has been identified the need for other services that RISEN CONSULTANTS does not provide, it is the policy of our agency to provide a list of other providers and professionals in the area with the background and expertise to provide effective support services to the client and their family. Our staff does not provide services or recommendations outside our area of expertise.
  - Risen Consultants assumes responsibility for providing referrals to clients for services not delivered in our agency. These needs are identified during the initial or ongoing assessments conducted. Collaboration with other behavioral health providers is documented in client's records.
  - The client/family, Clinical Director, Lead Analyst will be involved in the transfer and referral decisions, as appropriate.
  - Appropriate parties will be informed immediately as the need for transfer becomes evident. This is accomplished by:

- A written *Discharge Summary* concerning RISEN CONSULTANTS's involvement with the client, e.g., summary of services provided, recommendations, instructions/referrals. *Discharge Summary* will be provided to receiving organization within seventy-two (72) hours of transfer when RISEN CONSULTANTS is actively involved in the transfer process. Information about Person/ Clinician contacted for collaboration is documented in the *Discharge Summary*.
- The client's records, if requested, after proper release is signed by client and/or caregiver
- Follow up upon referrals are completed after the 30-day period to ensure that client is obtaining the proper support and care.
- Risen Consultants, LLC. will not turn down a family for coverage nor will we discharge or discontinue treatment on the basis of race, creed, sexual orientation, or socio-economic characteristics.

## **XX. Ensuring Health and Safety**

### **Policy**

RISEN CONSULTANTS, LLC. promotes the health and safety of every individual that is served by our company. This is done by ruling out medical concerns and/or working closely with medical providers, using only the least intrusive procedures, recognizing and reporting abuse, and taking precautions when transporting individuals.

### **Purpose**

To provide with a multifaceted approach to safeguard the health and safety of all clients and staff affiliated with Risen Consultants, LLC.

### **Procedure**

1. **Training:** All RISEN CONSULTANTS, LLC staff working directly with clients will maintain certification in HIV/AIDS training, infection control procedures, and Cardiopulmonary Resuscitation (CPR). We will also ensure that we fully understand how to recognize sign of abuse and appropriate abuse reporting protocol, incident reporting procedures and how fires and other natural disasters, accidents, illnesses and injuries should be handled.
2. **incident Reporting:** RISEN CONSULTANTS, LLC. will ensure the staff members fully understand the District's operating procedure related to incident reporting and will seek clarification on the procedure as needed. We will ensure that all incident reports are sent within required timeframes and to the appropriate district personnel in charge.

3. **Infection Control:** RISEN CONSULTANTS, LLC will use universal precautions practices and will teach proper hand washing protocols to consumers we serve. All the person related or involved with the consumer will be notified of any medical attention the consumer needs outside of our normal scope of service.
4. **Sanitation:** RISEN CONSULTANTS, LLC will make sure that we use proper sanitation guidelines and provide prompting and assistance to clients who reside in their own homes to ensure that their home maintains appropriate sanitary practices.
5. **First Aid and Supplies:** RISEN CONSULTANTS, LLC will assist clients residing in their own homes by addressing the importance of having an adequate first aid kit available in case of emergencies.
6. **Proper Medical Care:** When assessing problem behaviors that may have bio-medical influences, RISEN CONSULTANTS, LLC requires the client or caregiver to rule out medical factors that may first be the explanation for the problem behaviors. This ensures that a behavioral treatment is not recommended for a problem that can be treated medically. If a client suffers an injury or does not seem well, their RISEN CONSULTANTS, LLC staff member must call 911 and afterwards inform their legal guardian and/or parent.
7. **Medication Administration:** It is not the role of RISEN CONSULTANTS, LLC to administer medical treatment or handle medication. Since RISEN CONSULTANTS, LLC is focused on helping caregivers or service providers to implement behavioral procedures rather than service in a direct care role, RISEN CONSULTANTS, LLC staff members are at no time alone with clients, which does not necessitate medication administration.
8. Risen Consultants, LLC. adheres to state and federal guidelines outlined by the department of health in reporting confirmed and suspected cases of infectious disease(s). If any member of Risen Consultants's team – or a caregiver - suspects or confirms infectious disease in an individual, they are obligated to report it to their local or regional health department.
9. Risen Consultants, LLC. informs consumers and their caregivers of the reporting protocols and ensures that they are aware that Risen Consultants, LLC. contractors are required to report suspected or confirmed cases to this number (1-850-245-4401).

## **XXI. Sentinel Event**

### **POLICY**

RISEN CONSULTANTS will identify and analyze all defined sentinel events.

### **PURPOSE**

To identify processes for investigating and responding to sentinel events.

### **PROCEDURE**

1. RISEN CONSULTANTS defines a sentinel event as a client safety event (not related to the natural course of the client's illness or underlying condition) that reaches a client and results in any of the following:

- Death.
- Permanent harm.
- Severe temporary harm.

2. Sentinel events for clients might include:

- Unexpected, unanticipated death not related to the normal course of the client's disease process.
- Unanticipated death or major permanent loss of function associated with a healthcare associated infection.
- An elopement, that is, unauthorized departure, of a client from an around-the-clock care setting (e.g., in client facility) resulting in death (suicide, accidental death or homicide) or major permanent loss of function.
- Sexual abuse/assault, (leading to death, permanent harm or severe temporary harm), homicide or other crime of any client receiving care, staff member, visitor, vendor or licensed independent practitioner while onsite at the office.
- A client fall that results in death or major loss of function as a direct result of injuries sustained from the fall.
- Fire, flame or unanticipated smoke, heat or flashes occurring during an episode of care.
  - Suicide of a client receiving care or within 72 hours of discharge.
  - Abduction of any client.

3. All staff will be educated during orientation and on an ongoing basis of the sentinel event policy.

4. RISEN CONSULTANTS will identify and respond appropriately to all sentinel events as defined, including:



- A formalized team response that stabilizes the client, discloses the event to the client and family and provides support for the family as well as staff involved in the event.
  - Notification of leadership.
  - Immediate investigation.
  - Completion of a comprehensive, systematic analysis for identifying the causal and contributory factors.
  - Corrective actions.
  - Time line for implementation of corrective actions.
  - Systematic improvement.
5. The Director and Analyst will initiate an intensive assessment/analysis of the sentinel event by performing a thorough and credible root cause analysis, which will focus on systems and processes. Appropriate staff, client’s assistant and legal counsel will be involved in the root cause analysis.
  6. RISEN CONSULTANTS will create, document and implement risk-reduction activities and action plan. The effectiveness of system and/or process improvements will be measured and analyzed.
  7. Sentinel events will be reported to external organizations as required by applicable federal or state law, including insurance carrier.
  8. On an ongoing basis, RISEN CONSULTANTS leaders will monitor published data regarding sentinel events in RISEN CONSULTANTS care. Such data will be considered for improvement strategies and risk reductions.

## **XXII. Abuse, Neglect and Exploitation**

### **Policy**

All clients and staff affiliated with RISEN CONSULTANTS will take a Zero Tolerance Policy training and learn the importance of gaining an understanding of the subjects of Abuse, Neglect and Exploitation on an ongoing monthly basis.

### **Purpose**

To ensure a higher quality of life and prevent any type of abuse of vulnerable individuals.

### **Related Documents**

A.7 “Training for Zero Tolerance & Client Prevention of Various Abuses, Neglect and Exploitation”

## **Procedure**

1. Each month clients will be asked about what they have learned and for them to either verbally communicate or signal if these events have occurred.
2. The number and entity to call in the event that one of these occurrences were to happen to them or to someone they know will be given to clients in written form.
  - Call the Arizona Abuse Hotline, which is a nationwide toll-free telephone number at 1-888-767-2445 for children and (877) 767-2385 for adults and Call the Police.
  - All staff is to notify a supervisor, and
    - The reporter or their supervisor should notify the necessary authorities and insurance in accordance with established incident reporting procedures.
  - If anyone becomes aware of a situation in which the clients' life is in immediate danger due to abuse, neglect or exploitation, call 911 before calling anyone else.

## **XXIII. Plan for Client/Caregiver Education**

### **POLICY**

RISEN CONSULTANTS will educate and train client/family according to the needs assessed by RISEN CONSULTANTS staff and as appropriate to the required services.

### **PURPOSE**

To assess the client/family's needs, to improve treatment outcomes and to ensure competency in generalization and maintenance of gains.

### **PROCEDURE**

1. Educational needs related to the client's needs, or RISEN CONSULTANTS services will be assessed as part of the referral and during the assessment. The client's record should reflect special consideration related to the education plan for the client/family and include, but is not limited to:
  - Physical limitations.
  - Emotional barriers or motivation to learn.
  - Cognitive limitation.
  - Language barriers.
  - Religious and cultural barriers
2. RISEN CONSULTANTS staff understands that the assessment of client/family's education needs are ongoing and will be regularly reassessed as needs change.
3. All client/family education, the perceived comprehension, ability to demonstrate a taught skill will be documented in the client's record in the competency assessment.
4. Training to caregivers is provided in every session through modeling and demonstration of skills by paraprofessionals and Lead Analysts. In-service training is officially

provided by Analyst at least twice a month to teach specific topics of behavior plan and issues related to health and safety.

5. Caregiver Competency Assessment is conducted monthly to evaluate skills developed and needs for upcoming trainings. Baseline data and objectives with mastery criteria are developed to promote caregiver's involvement and increased performance.

6. Education material/information will be readily available to the staff for client/caregiver use. These teaching tools will be individualized with regard to the client's needs, diagnosis or treatment and may include, but are not limited to:

- Verbal instructions as needed and, if appropriate, demonstration of knowledge by client/family.
- Written materials from outside recommended sources and/or by RISEN CONSULTANTS staff with specific expertise, e.g., brochures, instructional manuals, specific teaching plans and materials, etc.
- Available community resources, e.g., community programs or organizations, Autism's Associations, etc.

5. Teaching tools will be individualized. RISEN CONSULTANTS staff providing patient/caregiver education will have the appropriate training to provide these services.

## XXIV. REVIEW OF POLICY MANUALS

Date	Reviewed by: Name, Position	Signature:

Date	Reviewed by: Name, Position	Signature:

Date	Reviewed by: Name, Position	Signature:

Date	Reviewed by: Name, Position	Signature: