RETURN RECEIPT
E-MAIL TRANSMISSION TO: blincoln@elevateccbhc.org

February 23, 2022

Bob Lincoln, Executive Director
Elevate CCBHC
604 Lafayette Street
2nd Floor
Waterloo, IA 50703

Dear Mr. Lincoln;

Attached is a copy of the Licensure Inspection Report completed by the Division of Behavioral Health following the licensure virtual inspection of Elevate CCBHC, 604 Lafayette Street, Waterloo, Iowa on January 26 and 31, 2022. **The Division will recommend denial of the licensure application to the Substance Abuse/Problem Gambling Program Licensure Committee** due to your program's failure to achieve the minimum licensure weighting report rating (70%) required for a license pursuant to rule 641–155.10(1)(b). Specifically, your program received a 54.8% score in the Clinical Standards section.

Your current license, which expired on November 7, 2021, remains valid until final action is taken by the Substance Abuse/Problem Gambling Program Licensure Committee on this application, per Iowa Code Chapter 17A.18.

Your application for re-licensure will be reviewed during the Committee's teleconference meeting on **March 9, 2022, at 9:00 am**. Please let me know if you would like to participate in this meeting and a phone number will be provided to you. ***Program representation is welcomed but not required.***

If you have questions, please contact me at Lori Hancock.Muck@idph.iowa.gov or at (515) 204-9766.

Sincerely,

Lori Hancock-Muck
Health Facilities Officer
Division of Behavioral Health

IOWA DEPARTMENT OF PUBLIC HEALTH
DIVISION OF BEHAVIORAL HEALTH
LICENSURE INSPECTION WEIGHTING REPORT
FOR SUBSTANCE USE DISORDER AND PROBLEM GAMBLING TREATMENT PROGRAMS

PROGRAM NAME: Elevate CCBHC, Waterloo

In order for a program to receive a three (3) year license, the program must receive at least a 95% rating in each of the three categories below. For a two (2) year license, the program must receive at least a 90% rating in each of the three categories below. For a one (1) year license, the program must receive at least a 70% rating in each of the three categories. Less than 70% in any one of the three categories shall result in a recommendation of a denial. An initial license may be issued for 270 days. A license issued for 270 days shall not be renewed or extended.

PREVIOUS INSPECTION DATE: January 21, 2021 (Virtual inspection due to COVID-19)

RECENT INSPECTION DATE: January 26 and 31, 2022 (Virtual inspection due to COVID-19)

THIS PROGRAM HAS APPLIED FOR A LICENSE AS A:

1. SUBSTANCE USE DISORDER ASSESSMENT AND OWI EVALUATION-ONLY PROGRAM ____
2. SUBSTANCE USE DISORDER TREATMENT PROGRAM X
3. PROBLEM GAMBLING TREATMENT PROGRAM ____
4. SUBSTANCE USE DISORDER AND PROBLEM GAMBLING TREATMENT PROGRAM ____

Standard Cite	Clinical Standards	Item Count	Standard Compliance Score
155.21(11)	**Assessment and Admission**	6	1
155.21(12)	**Treatment Plans**	5	1
155.21(13)	**Progress Notes**	5	4
155.21(15)	**Drug Screening**	4	4
155.21(16)	**Medical and Mental Health Services**	1	1
155.21(19)	**Management of Care and Discharge Planning**	4	0
155.21(20)	**Quality Improvement**	6	6
	TOTAL	**31**	**17**

Three (3) years: 95%	Total Clinical Points Available	**31**
Two (2) years: 90%	Total Clinical Points Received	**17**
One (1) year: 70%		
Denial: 69% or below	Clinical Score (%)	**54.8%**

Standard Cite	Administrative Standards	Item Count	Standard Compliance Score
641—155.17(125,135)	**License Revision**	0	0
155.21(1)	**Governing Body**	9	9
155.21(2)	**Executive Director**	1	1
155.21(3)	**Clinical Oversight**	1	1
155.21(4)	**Policies and Procedures Manual**	3	3
155.21(5)	**Staff Development and Training**	6	6
155.21.(6)	**Data Reporting**	1	1
155.21.(7)	**Fiscal Management**	2	2
155.21(8)	**Personnel**	6	5
155.21(9)	**Child Abuse/Dependent Adult Abuse/Criminal History Background Check**	5	5
	TOTAL	**34**	**33**

Three (3) years: 95%	Total Administrative Points Available	**34**
Two (2) years: 90%	Total Administrative Points Received	**33**
One (1) year: 70%		
Denial: 69% or below	Administrative Score (%)	**97.1%**

Standard Cite	Programming Standards	Item Count	Standard Compliance Score
155.21(10)	**Patient Records**	7	5
155.21(14)	**Patient Record Contents**	3	1
155.21(17)	**Emergency Services**	3	3
155.21(18)	**Medication Control**	1	1
155.21(21)	**Facility Safety and Cleanliness**	2	2
155.21(22)	**Therapeutic Environment**	5	5
155.25(125,135)	**Specific standards for substance use assessment and OWI evaluation-only programs**	0	0
641 – 155.34(125,135)	**Specific Standards for Enhanced Services**	0	0
641—155.38(125,135)	**Tuberculosis screening of staff and residents**	1	0
	TOTAL	**22**	**17**

Three (3) years: 95%	Total Programming Points Available	**22**
Two (2) years: 90%	Total Programming Points Received	**17**
One (1) year: 70%		
Denial: 69% or below	Programming Score (%)	**77.3%**

IOWA DEPARTMENT OF PUBLIC HEALTH
DIVISION OF BEHAVIORAL HEALTH
LICENSURE INSPECTION REPORT

PROGRAM NAME, ADDRESS, TELEPHONE AND FAX:
Elevate CCBHC
604 Lafayette Street
2nd Floor
Waterloo, IA 50703
P- 833-370-1719 E-Mail Address: blincoln@elevateccbhc.org

APPLICATION RECEIVED: September 22, 2021

DATE OF INSPECTION: January 26 and 31, 2022 (Virtual inspection due to COVID-19)

INSPECTORS:
Lori Hancock-Muck
Amanda McCurley

SITE(S) VISITED:
604 Lafayette Street
2nd Floor
Waterloo, IA 50703

STAFF:
Executive Director: Bob Lincoln

SUMMARY OF SERVICES PROVIDED: Program provides Adult and Juvenile Levels 1, 2.1, and 2.5 Substance Use Disorder Treatment Services

CURRENT LICENSURE STATUS:
Program is operating on an initial 270-day license from February 10, 2021 to November 7, 2021.

RECOMMENDATION: It is recommended that the program be—

☐ Issued a license for a period of three years effective ______________ to ______________
☐ Issued a license for a period of two years effective ______________ to ______________
☐ Issued a license for a period of one year effective ______________ to ______________
☐ Issued a license for 270 days effective ______________ to ______________
☒ ***Deny application for a license pursuant to 155.10(1)(b) Failure to achieve the minimum licensure weighting report rating (70%) required for a license.***

PURPOSE: Chapter 125 of the Code, as amended, requires in Section 125.13 that a person may not maintain or conduct any chemical substitutes or antagonists program, residential program, or non-residential outpatient program, the primary purpose of which is the treatment and rehabilitation of substance abusers without having first obtained a written license for the program from the department. Chapter 135.150 of the Code, as amended, requires that a person shall not maintain or conduct a gambling treatment program funded through the department unless the person has obtained a license for the program from the department.

1 Full Compliance – The program substantially meets the intent of the standard and indicated by the program's activities and documentation. Point(s) given/awarded.
0 Non-Compliance – The program does not meet the intent of the standard. Point(s) not given/awarded.
NA Does Not Apply – The standard does not apply to the program. Point(s) not given/awarded.

Standards Cite	Standards Description	
641—155.17(125,135)	**License Revision**	
	A licensee is required to submit a written request to the division to revise a license at least 30 days prior to any change of address, executive director, clinical oversight staff, facility, or licensed program service. Since the last licensure visit, has the program experienced any such changes and has it complied with the requirement to notify the department?	NA
155.21(1)	**Governing Body**	
	Has the program designated a governing body that complies with Iowa Code chapter 504 and is responsible for overall program operations?	1
a	Has the governing body adopted written bylaws and policies that define the powers and duties of the governing body, its committees, its advisory groups, and the executive director?	1
b	Do written by-laws minimally specify the following? (1) The type of membership; (2) The term of appointment; (3) The frequency of meetings; (4) The attendance requirements; and (5) The quorum necessary to transact business.	1
c	Are minutes of all meetings by the governing body maintained and available for review by the department and do they include the following? (1) Date of the meeting; (2) Names of members attending; (3) Topics discussed; and (4) Decisions reached and actions taken.	1
d	Do the duties of the governing body include the following? (1) Appointment of a qualified executive director, who shall have the responsibility and authority for the management of the program in accordance with the governing body's established policies; (2) Establishment of effective controls to ensure that quality services are provided; (3) Review and approval of the program's annual budget; and (4) Approval of all contracts.	1
e	Has the governing authority developed and approved the program's policies and procedures?	1
f	Is the governing authority responsible for all funds, equipment and the physical facilities and the appropriateness and adequacy of services the program provides?	1
g	Has the governing body prepared an annual report which includes each of the following? (1) The name, address, occupation, and place of employment of each governing body member; (2) Disclosure of any family relationship a member of the governing body has with a program staff member; (3) The names and addresses of any owners or controlling parties whether they are individuals, partnerships, a corporation body, or a subdivision of other bodies; (4) Disclosure of any potential conflict of interest a member of the governing body may have.	1
h	Has the governing body ensured the program maintains proof of each of the following? -Malpractice insurance coverage for all staff -Liability insurance -Workers' compensation insurance -A fidelity bond for all staff	1

155.21(2)	**Executive Director**	
	Has the governing body appointed an executive director who has primary responsibility for program operations and whose qualifications and duties are clearly defined?	1
155.21(3)	**Clinical Oversight**	
	Has the program designated a treatment supervisor to oversee provision of licensed program services?	1
155.21(4)	**Policies and Procedures Manual**	
	Has the program developed and maintained a policies and procedures manual that contains all written policies and procedures required in order to comply with licensure rules? Does the policies and procedures manual describe the program's licensed program services and related activities, specify the policies and procedures to be followed and govern all staff?	1
a	Does the manual have a table of contents?	1
b	Are revisions to the manual entered with the date, and name and title of persons making the revisions?	1
155.21(5)	**Staff Development and Training**	
	Does the program have policies and procedures establishing a staff development and training program that includes reference to the training needs of any individual who conducts an activity on behalf of the program as an employee, agent, consultant, contractor, volunteer or other status?	1
a	Has the program designated a staff person responsible for the staff development and training plan?	1
b	Has the staff person responsible for the staff development and training plan conducted an annual needs assessment?	1
c	Does the staff development plan describe orientation of new staff including: -An overview of the program and licensed program services -Confidentiality -Tuberculosis and blood-borne pathogens including HIV/AIDS -Culturally and environmentally specific information -The specific responsibilities of each staff person and community resources specific to the staff person’s responsibilities	1
d	Does the staff development and training plan address training when program operations or services change?	1
e	If the development and training plan includes on-site activities, are minutes of on-site training kept which include: -Name and dates of the trainings -Names of staff attending -Topics of the training -The name(s) and title(s) of trainers	1
155.21.(6)	**Data Reporting**	
	Does the program have policies and procedures describing how the program reports required data to the division in accordance with department requirements and processes?	1
155.21(7)	**Fiscal Management**	
a	Do the program’s policies and procedures ensure proper fiscal management including the preparation and maintenance of an annual written budget which is reviewed and approved by the governing body prior to the beginning of each of the program’s budget years	1
b	If the program has an annual budget of over $100,000, has the program had an annual independent fiscal audit by the state auditor’s office or a certified public accountant based on an agreement entered into by the governing body?	NA

	If the program has an annual budget of $100,000 or less, has the program conducted an audit within the last three years?	
c	Does the program maintain insurance to provide protection for physical and financial resources of the program, people, buildings, and equipment? Is the insurance program reviewed on an annual basis by the governing body?	1
155.21(8)	**Personnel**	
a	Does the program have personnel policies and procedures that address the following: (1) Recruitment and selection of staff; (2) Wage and salary administration; (3) Promotions; (4) Employee benefits; (5) Working hours; (6) Vacation and sick leave; (7) Lines of authority; (8) Rules of conduct; (9) Disciplinary actions and termination; (10) Methods for handling cases of inappropriate patient care; (11) Work performance appraisal; (12) Staff accidents and safety; (13) Staff grievances; (14) Prohibition of sexual harassment; (15) Implementation of the Americans with Disabilities Act; (16) Implementation of the Drug-Free Workplace Act; (17) Use of social media; and (18) Implementation of equal employment opportunity.	1
b	Does the program maintain written job descriptions describing the actual duties of the staff and the qualifications required for each position and: (1) Is there evidence that all personnel providing screenings, evaluations, assessments and treatment are licensed, certified, or otherwise in accordance with 155.21(8) requirements? (2) Does the program review job descriptions annually and whenever there is a change in a position's duties or required qualifications? (3) Does the program include job descriptions in the personnel section of the policies and procedures manual?	1
c	Are written performance evaluations of all program staff performed at least annually and is the staff able to respond to the evaluation in writing?	1
d	Are personnel records kept on each staff? They shall include the following. (1) Verification of training, experience, qualifications, and professional credentials; (2) Job performance evaluations; (3) Incident reports; (4) Disciplinary action taken; and (5) Documentation of review of and agreement to adhere to confidentiality laws and regulations.	0
e	Does the program have written policies and procedures that ensure the confidentiality of personnel records and that specify which staff are authorized to have access to them?	1
f	If a certified or licensed staff member has been sanctioned or disciplined by a certifying or licensed body, did the program notify the division in writing within ten workings days of being informed and did the notification include the sanction or discipline order?	1
155.21(9)	**Child Abuse/Dependent Adult Abuse/Criminal History Background Check**	
	Does the program have written policies and procedures that specify procedures that address child abuse, dependent adult abuse and criminal history background checks?	1

a	Do the policies state: - prohibiting mistreatment, neglect or abuse of children and dependent adults by staff include reporting and enforcement procedures - if a staff person is found in violation of Iowa Code sections 232.67 through 232.70 by the department of human services investigation, the staff shall be subject to the program's policies concerning termination - reporting violations immediately to the program's executive director and appropriate Department of Human Services staff	1
b	For staffs working within a juvenile service area, or with dependent adults, do personnel records contain the following? (1) Documentation of a criminal history background check with the Iowa division of criminal investigation on all new staff applicants. The background check shall include asking whether the applicant has been convicted of a crime. (2) A written, signed and dated statement furnished by a new staff applicant which discloses any substantiated report of child abuse, neglect or sexual abuse or dependent adult abuse. (3) Documentation of a check prior to permanent acceptance of a person as staff, with the Iowa central registry for any substantiated reports of child abuse, neglect or sexual abuse pursuant to Iowa Code section 125.14A or substantiated reports of dependent adult abuse for all staff hired or accepted on or after July 1, 1994, pursuant to Iowa Code chapter 235B.	1
c	If a record of criminal conviction or founded child abuse or founded dependent adult abuse exists for a person hired by the program, does a record exist that Iowa DHS concluded that the crime or founded child abuse or founded dependent adult abuse does not merit prohibition of employment? Is there record of the hire having been offered the opportunity to complete and submit Form 470-2310, Record Check Evaluation?	1
d	Has each staff member completed two hours of training relating to the identification and reporting of child abuse and dependent adult abuse within six months of initial employment; and two hours of additional training every three years thereafter?	1
155.21(10)	**Patient Records**	
	Does the program have written policies and procedures governing patient case records that describe compilation, storage and dissemination of patient records and release or disclosure of information?	1
a	The policies and procedures shall ensure that: (1) The program protects the patient record against loss, tampering or unauthorized disclosure of information; (2) The content and format of patient records are uniform; (3) All entries in the patient record are in chronological order, signed, dated and legible. When records are maintained electronically, a staff identification code number authorizing access shall be accepted in lieu of a signature; (4) Each entry in the patient record is made in permanent ink, by typewriter, or by computer; and (5) Entries in the patient record use language consistent with generally accepted standards of practice and do not include abstract terms, technical jargon or slang.	0
b	Does the program provide adequate physical facilities for the secure storage, processing and handling of patient records?	1
c	Is there a program policy authorizing access to appropriate patient records by staff?	1
d	Is there a written policy governing maintenance of patient records for not less than seven (7) years from the date they are officially closed and for the disposal of patient case records?	1
e	Are all paper patient records kept in a suitable locked room or file cabinet?	1

f	Do the program's written policies and procedures provide for the release or disclosure of information on individuals seeking program services or on patients in strict accordance with the Health Insurance Portability and Accountability Act (HIPAA) and state and federal confidentiality laws, rules and regulations? (1) The confidentiality of substance use disorder patient records and information is protected by HIPAA and the regulations on confidentiality of alcohol and drug abuse patient records, 42 CFR Part 2, which implement federal statutory provisions, 42 U.S.C. 290dd-3 applicable to alcohol abuse patient records, and 42 U.S.C. 290ee-3 applicable to drug abuse patient records. (2) The confidentiality of problem gambling patient records and information is protected by HIPAA, Iowa Code chapter 228 and Iowa Code section 22.7(35).	0
g	If the program provides services via electronic media, has it informed the patient of the limitations and risks associated with such services and documented in each patient case record that such notices have been provided?	NA
h	Upon receipt of a properly executed written release of information signed by the patient, did the program release patient records in a timely manner? Exceptions are allowed for reporting information unrelated to continuum of care, if payment has not been received for such services or in the case of 321J reporting form.	NA
155.21(11)	**Assessment and Admission**	
	Does the program have written policies and procedures that address screening, assessment, referral and admission and documentation of such activities in the patient record?	1
a	Does each patient record contain an assessment developed prior to admission unless the patient's risk factors indicate the need for immediate admission? (1) If the program admits a patient based on a screening or initial assessment that indicates the patient requires immediate admission, that screening or initial assessment must be updated and expanded to a full assessment when the patient's current risk factors are stabilized. (2) The assessment shall be documented in the patient record and shall be organized in a manner that supports development of a treatment plan by the program or by any program to which the patient is referred.	0
b	Has the program implemented a uniform assessment process that describes: (1) The information to be gathered; (2) Procedures for accepting a referral from another program, agency or organization; (3) Procedures for referring a patient to another program, agency or organization.	0
c	Does each patient record contain an assessment that has been updated on an ongoing basis within the periods of time specified for each level of care in the management-of-care process? (continuing stay reviews)	0
d	Have the results of the assessment been explained to the patient and family if appropriate, and has the explanation been documented in the patient record?	0
e	Does the patient record contain documentation that the patient has been informed of: (1) The general nature and goals of the program; (2) Rules governing patient conduct and infractions that can lead to disciplinary action or discharge from the program; (3) The hours during which services are available; (4) The costs to be borne by the patient; (5) Patient rights and responsibilities; (6) Confidentiality laws, rules and regulations; and (7) Safety and emergency procedures.	0

155.21(12)	**Treatment Plans**	
	Does the program have written policies and procedures that describe the program's uniform process for developing individualized treatment plans based on ongoing assessment and the documentation of such plans in each patient record?	1
a	Was the treatment plan developed within the period of time between admission and the review date specified for that level of care?	0
b	Does the treatment plan minimally contain each of the following? (1) A summary of assessment findings; (2) Patient short- and long-term goals; (3) The type and frequency of planned treatment activities; (4) The staff responsible for the patient's treatment; and (5) Culturally and environmentally specific considerations.	0
c	Does the treatment plan meet each of the following conditions? > Is the treatment plan developed in partnership with the patient and is patient participation documented in the patient record? > Is the treatment plan written in a manner clearly understandable to the patient? > Was the patient provided a copy of the treatment plan? > Is there documentation that the patient and staff reviewed the treatment plan when clinically indicated and within the time frames specified for this level of care?	0
d	Are treatment plan reviews based on ongoing assessment and do they specify the indicated level of care and licensed program services and any revision of treatment plan goals? Are the dates of the reviews and any revisions of the treatment plan documented in the patient record?	0
155.21(13)	**Progress Notes**	
	Does the program have written policies and procedures that describe a uniform process for reviewing a patent's current status and progress in meeting treatment plan goals and documenting such review in the patient record?	1
a	Do progress notes contain the date each service was provided or observation made and the name and title of the staff person providing each service or documenting each observation?	1
b	Is there a progress note entered following each individual session?	1
c	Is there a progress note entered at least weekly for group counseling sessions?	0
d	If the note contains a subjective interpretation of the patient's status or progress, is there a description of the behavioral observation upon which the interpretation was based?	1
155.21(14)	**Patient Record Contents**	
	Does the program have written policies and procedures that require that a record be maintained for each patient and do they specify the contents of the patient record?	1
a	Do the patient records include the following? (1) Any screening; (2) Each assessment; (3) Results of any physical examination or laboratory test; (4) Admission information; (5) Any report from a referring source or outside resource; (6) Notes from any case conference, consultation, care coordination or case management; (7) Any correspondence related to the patient, including letters, electronic communications and telephone conversations; (8) Any treatment consent form; (9) Any release of information or authorization to disclose; (10) Notes on any service provided; and (11) Any incident report.	0

b	For substance use disorder treatment programs, problem gambling treatment programs, and substance use disorder and problem gambling treatment programs, do the patient records also include each of the following? (1) Treatment plans; (2) Management-of-care reviews; (3) Medication records, which shall allow for the monitoring of all medications administered and self-administered and detection of adverse drug reactions; (4) Progress notes; (5) Discharge summaries completed within 30 days of discharge, which shall be sufficiently detailed to identify the types of services the patient received, action taken to address specific problems identified, and plans for services and referrals post discharge.	0
c	If this program is a problem gambling treatment program or a substance abuse/problem gambling treatment program, does the patient record contain documentation of financial counseling services that have assisted the patient in preparing a budget and addressing financial debt options including restitution and bankruptcy?	NA
155.21(15)	**Drug Screening**	
	Does the program have written policies and procedures addressing collection of drug-screening specimens and utilization of drug-screening results? If the program does not conduct drug screenings, does it have a policy stating such?	1
a	Are specimens collected under direct supervision and analyzed according to program policies, or does the program shall have a policy in place to reduce the patient's ability to alter the test?	1
b	If the program uses an outside laboratory to analyze drug screening, does it comply with federal and state requirements?	1
c	If the program conducts on-site drug screenings, does the program comply with all Clinical Laboratory Improvement Act regulations?	NA
d	Does the patient record reflect the manner in which the drug-screening results are utilized in treatment?	1
155.21(16)	**Medical and Mental Health Services**	
	Does the program have written policies and procedures to address medical and mental health services?	1
a	In addition to assessment of biomedical conditions and complications as described in the ASAM criteria, has the program taken a medical history and performed a physical examination and necessary laboratory tests as follows for patients admitted to the level of care specified? (1) Medically managed intensive inpatient treatment and medically monitored intensive inpatient treatment: within 24 hours of admission. (2) Clinically managed high-intensity residential treatment and clinically managed medium-intensity residential treatment: within 7 days of admission. (3) Clinically managed low-intensity residential treatment: within 21 days of admission. (4) Crisis stabilization services and opioid treatment program services: within 24 hours of admission.	NA
b	Have physical, laboratory work and medical histories accepted from qualified sources been completed within 90 days prior to admission?	NA
c	If the program has accepted a mental health history from a qualified source, was the history completed no more than three (3) days prior to the patient's current admission?	NA
155.21(17)	**Emergency Services**	
	Does the program have written policies and procedures addressing the availability of emergency services for SUD's and medical and mental health conditions?	1
a	Does the program have emergency services available 24 hours/day, 7 days/week?	1
b	If the program does not provide emergency services, does it ensure they are available from another qualified individual, institution, facility or legal entity?	NA

c	Has the program communicated the availability of emergency services by posting notice at facilities, having a recorded message on the program's telephone system, posting notice on the program's web site and through program materials?	1
155.21(18)	**Medication Control**	
	Does the program have written policies and procedures that describe how medications are administered or self-administered in accordance with federal, state and local laws, rules and regulations? If the program does not conduct medication administration or self-administration, does its policies and procedures state as such?	1
a	Does the program maintain a list of qualified personnel authorized to administer medications as designated by rule 657-8.32(124,155A)?	NA
b	Are all medications being administered in accordance with the instructions of the attending prescriber and documented in the patient record? Documentation shall include type and amount of the medication, the time and date, and the staff person administering the medication.	NA
c	Does the program have written policies and procedures on self-administration requiring that self-administration be observed by a staff person who has been oriented to the program's policies and procedures on self-administration and that self-administered medications be clearly labeled? Written policies and procedures on self-administration shall include the following. (1) Medications are ordered or prescribed by a prescriber. (2) The prescriber agrees that the patient can self-administer the medication. (3) The medication taken and how and when the medication is taken are documented in the patient record.	NA
d	Are prescription drugs which are administered or self-administered, accompanied with a written order signed by a physician? Are all prescribed medications clearly labeled with the patient's full name, the prescriber's name, the prescription number, and the name and strength of the medication, the dosage, the directions for use and the date of issue; and the name, address and telephone number of the pharmacy or prescriber issuing the medication?	NA
e	If there is record of a medication a patient brought to the program not having been used, was it packaged, sealed and stored and was the sealed package of medication returned to the patient, family or designee at the time of discharge?	NA
f	Accountability and control of medications: (1) Is there a specific routine for medication administration, indicating dose schedules and standardization of abbreviations. (2) Are there specific methods for control and accountability of medication products throughout the program? (3) Does the staff person in charge of medications provide for monthly inspection of all storage units? (4) Are all prescription medication containers having soiled, damaged, illegible, or makeshift labels returned to the issuing pharmacist, pharmacy, or prescriber for relabeling or disposal? (5) Are unused prescription medications prescribed for a patient who leaves a program without the patient's medication, destroyed by a staff person with a staff witness, and is a notation made in the patient record? When a patient is discharged or leaves the program, is all medication currently being administered sent, in the original container, with the patient or with a responsible agent, as approved by a prescriber?	NA
g	Is all medication storage maintained in accordance with the security requirements of federal, state and local laws? (1) Are all medications maintained in locked storage? Are controlled substances maintained in a locked box within the locked cabinet? (2) Are all medications requiring refrigeration kept in a refrigerator and separated from	NA

	food and other items? (3) Are disinfectants and medication for external use stored separately from internal and injectable medications? (4) Are medications for each patient stored in original containers? (5) Are all poisonous or caustic medications plainly labeled, stored separately from other medication in a specific well-illuminated cabinet, closet, or storeroom and made accessible only to authorized staff?	
h	Does the program have written policies and procedures stating that all prescription medications provided to patients be dispensed by a licensed pharmacy in accordance with the laws of that state or by a licensed prescriber?	NA
i	Does the program have written policies and procedures stating that medications prescribed for one patient shall not be administered to or allowed to be in the possession of another patient?	NA
j	Does the program have written policies and procedures stating that any unusual patient reaction to a medication shall be documented in the patient record and reported immediately to the prescriber?	NA
k	Does the program have written policies and procedures stating that dilution or reconstitution and labeling of medication shall be done only by a licensed pharmacist?	NA
155.21(19)	**Management of Care and Discharge Planning**	
	Does the program have written policies and procedures requiring the use of ASAM criteria for assessment, admission, continued service and discharge decisions and describing the program's management-of-care processes? Does the patient file demonstrate proper use of the ASAM dimensions?	0
a	Is the program conducting care coordination to meet each patient's needs and promote effective outcomes?	NA
b	Is the program conducting management-of-care activities at least minimally within the time frames specified for each level of care? (1) Medically managed intensive inpatient treatment and medically monitored intensive inpatient treatment: daily. (2) Clinically managed high-intensity residential treatment, clinically managed medium-intensity residential treatment, partial/day treatment, and intensive outpatient treatment: within seven days of the patient's admission. (3) Clinically managed low-intensity residential treatment and outpatient treatment: within 30 days of the patient's admission.	0
c	If applicable, is the program coordinating patient care with other programs for any licensed service for which the program is not licensed and for any related services the program does not provide?	0
d	Is patient discharge planning started at the time of admission and does it include ongoing post-discharge patient needs?	0
155.21(20)	**Quality Improvement**	
	Does the program have policies and procedures describing a written quality improvement plan that encompasses all licensed program services and related program operations?	1
a	Has the program designated a staff person responsible for the quality improvement plan?	1
b	Does the written quality improvement plan describe and document monitoring, problem-solving and evaluation activities designed to systematically identify and resolve problems and make continued improvements? (1) Does the quality improvement plan include specific goals, objectives, and methods? (2) Does the quality improvement plan include objective criteria to measure its effectiveness?	1
c	Does the program document whether the quality of patient care and program operations are improved and identified problems are resolved?	1
d	Does the program communicate the quality improvement plan activities and findings to all staff?	1

e	Does the program use QI plan findings to detect trends, patterns of performance, and potential problems that affect patient care and program operations?	1
f	Does the program evaluate the effectiveness of the QI plan at least annually and are revisions to the plan made as necessary?	NA
155.21(21)	**Facility Safety and Cleanliness**	
	Does the program have written policies and procedures ensuring that program physical facilities are clean, well-ventilated, heated, free from vermin, and appropriately furnished and are designed, constructed, equipped, and maintained in a manner that provides for the physical safety of patients, concerned persons, visitors and staff?	1
a	Has the program obtained certificate(s) of occupancy, if required by local jurisdiction?	NA
b	During construction phases or alterations to buildings is construction in compliance with all applicable federal, state, and local codes? During new construction, has the program complied with local, state (Iowa Code chapter 104A), and federal codes and has the program provided for safe and convenient use by disabled individuals?	NA
c	Does the program have written policies and procedures for each of the following? (1) Identification, development, implementation, maintenance and review of safety policies and procedures. (2) Promotion and maintenance of an ongoing, facility wide hazard surveillance program to detect and report all safety hazards. (3) Safe and proper disposal of bio hazardous waste. (4) Stairways, halls, and aisles. Stairways, halls, and aisles shall be of substantial, nonslippery material, maintained in a good state of repair, adequately lighted and kept free from obstructions at all times. All stairways shall have handrails. (5) Radiators, registers, and steam and hot water pipes, each of which shall have protective covering or insulation. Electrical outlets and switches shall have wall plates. (6) For programs serving juveniles, fuse boxes that shall be under lock and key or six feet above the floor. (7) Safe and proper handling and storage of hazardous materials. (8) Prohibition against weapon possession; safe and proper removal of weapons. (9) Swimming pools. Swimming pools shall conform to state and local health and safety rules and regulations. Adult supervision shall be provided at all times when juveniles are using the pool. (10) Ponds, lakes, or any bodies of water located on or near the program and accessible to patients, concerned persons, visitors and staff. (11) The written plan to be followed in the event of fire or tornado. The plan shall be conspicuously displayed at the facility.	1
155.21(22)	**Therapeutic Environment**	
	Does the program's policies and procedures provide for the establishment of an environment that preserves human dignity? Do program facilities have adequate space for the program to provide licensed program services?	1
a	Does the program have written policies and procedures that describe how all licensed program services are accessible to people with disabilities or how the program provides accommodation in compliance with the Americans with Disabilities Act?	1
b	Is the waiting or reception area of adequate size and located in an area that ensures patient confidentiality?	1
c	Is staff available in waiting areas to address patient, potential patients, concerned persons and visitors' needs?	1
d	Does the program's policies and procedures include each of the following? (1) Possession and use of chemical substances in the facility. (2) Prohibition of smoking. (3) Prohibition of the sale or other provision of any tobacco product. (4) Informing patients of their legal and human rights at the time of admission.	1

	(5) Patient communication, opinions, or grievances, with a mechanism for redress. (6) Prohibition of sexual harassment. (7) Patient right to privacy.	
155.25(125,135)	**Specific standards for substance use assessment and OWI evaluation-only programs**	
155.25(1)	**OWI Evaluations**	
	Does the program have written policies and procedures that require it to conduct OWI evaluations on persons convicted of operating a motor vehicle while intoxicated (OWI) pursuant to Iowa Code section 321J.2 and on persons whose driver's license or nonresident operating privileges are revoked under Iowa Code chapter 321J in accordance with 641—Chapter 157?	NA
155.25(2)	**Assessment and OWI Evaluation Fees**	
	Does the program have written policies and procedures that require it to make its assessment and OWI evaluation fees public and has it informed potential patients of the fee at the time the assessment or at the time the OWI evaluation is scheduled?	NA
155.34(125,135)	**Specific standards for enhanced treatment services**	
155.34(1)	**Personnel**	
	Does the program have written personnel policies and procedures in compliance with subrule 155.21(8)?	NA
a	Does the program have written policies and procedures that include job descriptions for positions that provide prevention services for substance use disorders and problem gambling; treatment for substance use disorders and problem gambling; services for medical conditions; and services for mental health conditions?	NA
b	Does the program have written policies and procedures requiring that staff are on site and qualified to provide prevention and early intervention services for substance use disorders and problem gambling; treatment for substance use disorders and problem gambling; services for medical conditions; and services for mental health conditions?	NA
641—155.38(125,135)	**Tuberculosis screening of staff and residents**	
155.38(1)	**TB Risk Assessment**	
	Has the program conducted an annual TB risk assessment to evaluate the risk for transmission of *M. tuberculosis*?	NA
a	Does the risk assessment include the community rate of TB?	NA
b	Does the risk assessment include the number of persons with infectious TB encountered in the facility?	NA
c	Does the risk assessment include the speed with which persons with infectious TB are suspected, isolated, and evaluated to determine if persons with infectious TB exposed staff or others in the facility?	NA
155.38(3)	**Baseline TB screening procedures for facilities**	
a	Have all facility staff members received baseline TB screening upon hire? Baseline TB screening consists of two components: (1) assessing for current symptoms of active TB disease and (2) using a two-step TST or a single IGRA to test for infection with M. tuberculosis	0

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JUSTIFICATION OF VARIANCE

The following items were rated “0” (Non Compliance) and points were subtracted from the Licensure Weighting Report.

155.21(8) Personnel*

D. Personnel was in non-compliance because not all personnel records contained documentation of review and agreement to adhere to confidentiality laws and regulations prior to the staff person’s assumption of duties.

155.21(10) Patient Records*

A. Patient records was in non-compliance because the content and format of the patient records are not uniform.

F. Patient records was in non-compliance because releases of information were not in accordance with 42 CFR Part 2.

155.21(11) Assessment and Admission*

A. Assessment and admission was in non-compliance because the assessment was not documented in the patient record in an organized manner that supported development of a treatment plan.

B. Assessment and admission was in non-compliance because the program did not implement a uniform assessment process for the information to be gathered.

C. Assessment and admission was in non-compliance because the patient assessment was not updated on an on-going basis within the periods of time specified for outpatient level of care.

D. Assessment and admission was in non-compliance because the patient record did not contain documentation the assessment results were explained to the patient.

E. Assessment and admission was in non-compliance because patient records did not contain documentation that patients had been informed of the general nature and goals of the program, the rules governing patient conduct and infractions that can lead to disciplinary action or discharge from the program, the hours during which services are available, the costs to be borne by the patient, confidentiality laws, rules and regulations, or the safety and emergency procedures.

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155.21(12) Treatment Plans*

A. Treatment plans was in non-compliance because the treatment plan was not developed within the time periods specified for each level of care.

B. Treatment plans was in non-compliance because the treatment plan did not include a summary of assessment findings; patient short-term goals; or the type and frequency of planned treatment activities.

C. Treatment plans was in non-compliance because there was no documentation that patients were provided a copy of the treatment plan.

D. Treatment plans was in non-compliance because treatment plan reviews were not documented in the patient record.

155.21(13) Progress Notes*

C. Progress notes was in non-compliance because some patient records did not contain a weekly summary of group counseling sessions, as recreational activities were documented as such.

155.21(14) Patient Record Contents*

A. Patient record contents was in non-compliance because some patient records did not contain screenings; assessments; releases of information or authorization to disclose, or reports from a referring source or outside resource.

B. Patient record contents was in non-compliance because some patient records did not contain treatment plans, management of care reviews, progress notes, or discharge summaries documented within 30 days of discharge.

155.21(19) Management of Care and Discharge Planning*

Management of care and discharge planning was in non-compliance because patient records did not demonstrate proper use of the ASAM dimensions.

B. Management of care and discharge planning was in non-compliance because management-of-care activities where not documented within the time frames appropriate to the patient's ASAM level of care (every 30 days for outpatient level of care).

C. Management of care and discharge planning was in non-compliance because the patient record did not contain documentation the program is coordinating patient care with other programs.

D. Management of care and discharge planning was in non-compliance because patient discharge planning is not started at the time of admission and does not include ongoing post-discharge patient needs.

155.38(3) Baseline TB Screening Procedures for Facilities*

A. Baseline TB screening procedures for facilities was in non-compliance because staff did not receive baseline TB screening upon hire.

*Technical assistance was provided during the virtual site inspection. Licensee was provided specific technical assistance on the following areas of non-compliance:

- Licensee was informed staff must sign confidentiality agreements prior to assuming responsibilities.
- Licensee was informed patient record contents must be uniform in content and format. Drug use histories were incomplete and did not assess for amounts or frequency of use. Documentation in records included vague statements such as “experimented with it occasionally” or “does not drink often”. Alcohol use was not documented as being assessed in all records. Licensee was informed a thorough review of the ASAM dimensions is to be documented in all records and this is to include a complete drug use history documenting age of onset, last use, frequency and amounts, and route of administration.
- Although not an area of non-compliance, licensee was provided technical assistance regarding a patient record who received an assessment following an OWI arrest. The licensee confirmed the program does not provide OWI evaluations or treatment for the purposes of an OWI arrest. To prevent patients from having to be assessed more than once, it is recommended that the program include screening questions and patient information that clearly informs patients that assessment or treatment for the purposes of an OWI arrest are not provided at Elevate CCBHC and these services would need to be referred out.
- Licensee was informed that patient consents did not comply with 42 CFR Part 2. Consents did not include specific substance use disorder information to be disclosed. A juvenile patient record did not include a patient signed consent to disclose information to a parent and the parent signed consents to disclose information to another entity. Licensee was provided with consent examples and resources from the Legal Action Center to assist with 42 CFR Part 2 compliance. Licensee was also provided with information from the Legal Action Center advising that the licensee would be required to obtain patient consent in order to share information with other programs within the

agency (i.e., Elevate CCHC SUD program sharing patient information with Elevate CCBHC mental health services would require patient consent).

- Licensee was informed some patient records assessments did not include enough detail to support the development of a treatment plan. Licensee was informed the assessment should contain a thorough review of each of the 6 ASAM dimensions.
- Licensee was informed there was not a uniform assessment process in place to gather the information necessary to determine whether criteria was met for recommended levels of care. Many records did not include a though review of the 6 ASAM dimensions to support appropriate referrals to other programs.
- Licensee was informed that some patient records were either missing ASAM reviews or the reviews were untimely. ASAM continued stay reviews are to be documented every 30 days until discharged from outpatient level of care. License was informed a thorough review of each of the 6 ASAM dimensions shall be re-assessed every 30 days, even when the patient is absent from treatment.
- Licensee was informed some patient records had ASAM severity ratings and levels of care that were not always consistent with documented symptoms.
- Licensee was informed there was no evidence in patient records that results of the assessment were explained to the patient and family, if applicable.
- Licensee was informed there was no evidence in patient records that the patient was informed of the general nature and goals of the program, the rules governing patient conduct and infractions that can lead to disciplinary action or discharge from the program, the hours during which services are available, the costs to be borne by the patient, confidentiality laws, rules and regulations, or the safety and emergency procedures.
- Licensee was informed treatment plans are to be developed within the timelines specified for each level of care (within 30 days for Level 1 admission and within 7 days for Levels 2.1 and 2.5 admissions).
- Licensee was informed treatment plan goals were not always found in patient records. Other patient records contained treatment plan goals that were not consistent with addressing identified problems. For example, one patient record noted the patient relapsed using a lethally potent substance carfentanil, yet treatment goals were noted as “remain off Facebook and find a hobby to do alone in order to make friends.” Licensee was also informed the treatment plan needs to include all required elements (summary of assessment findings; short-and long-term goals; type and frequency of planned treatment activities; staff responsible for the patient’s treatment; and culturally and environmentally specific considerations).
- Licensee was informed the patient record needs to contain documentation that the patient was provided a copy of the treatment plan.
- Licensee was informed all patient records must include a treatment plan review documented every 30 days for patients admitted to outpatient level of care and every 7 days for patients admitted to intensive outpatient and partial/day treatment levels of care.

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- Licensee was informed dates of review and revisions to the treatment plan were not documented in patient records.
- Licensee was informed group progress notes did not always contain documentation that patients participated in group counseling sessions. Several records noted patients participated in outdoor recreational activities during group therapy sessions (i.e., Frisbee golf at a park, fishing at a lake, picking up garbage, etc.). As some of these services appeared to be submitted for Medicaid reimbursement for group therapy, a referral was made to Medicaid Fraud and Control Unit.
- Licensee was informed some patient records may not have contained required progress notes as it was not clearly documented as to the discharge status for each record,
- Licensee was informed that patient records must contain any report from a referring source or outside resource. Patient records did not contain any documents or reports from the referral source other than notation that the patient was being referred to the licensee.
- Licensee was informed some patient records were missing assessments, admission information, referring agency assessments, screenings, treatment plan reviews, ASAM continued stay reviews, releases of information, and treatment consents.
- Licensee was informed discharge summaries were not found in patient records and that discharge summaries are to be documented within 30 days of discharge.
- Licensee was informed discharge planning is to be documented at the time of admission.
- Licensee was informed patient records must contain documentation the program is coordinating patient care with other programs. Some patients remained in outpatient services, as residential beds were unavailable. Technical assistance was provided to staff informing them to notify Department staff if there is difficulty in finding residential services. Staff was also provided with a current listing of state wide residential substance use disorder programs.
- Licensee was informed that the program was not conducting management-of-care activities as required for outpatient services (every 30 days until discharged).
- Licensee was informed going forward all new staff would need a TB test upon hire, and all staff who currently do not have a TB test will need to have one completed.
- Although this was not an area of non-compliance, licensee was provided with the IDPH TB Risk Assessment Form with instructions that the form is to be completed annually.