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By DHRM-Mental Health Licensure at 8:20 am, Sep 16, 2019

**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

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Reference to the out of compliance Issue	Description of how Corrections will be made	Responsibility for Monitoring the Corrective Action	Timetable for the implementation of the corrective actions
<p>Service Category: V 000: INITIAL COMMENTS</p> <p>An annual and complaint survey was completed on August 15, 2019. The complaint (Intake #NC00154341) was substantiated. Deficiencies were cited.</p> <p>This facility is licensed for the following service categories 10A NCAC 27G .1200 Psychosocial Rehabilitation, 10A NCAC 27G .4400 Substance Abuse Intensive Outpatient Program and 10A NCAC 27G .4500 Substance Abuse Comprehensive Outpatient Treatment.</p> <p>V 105: 27G .0201 (A) (1-7) Governing Body Policies</p> <p>10A NCAC 27G .0201 GOVERNING BODY POLICIES</p> <p>(a) The governing body responsible for each facility or service shall develop and implement written policies for the following:</p> <p>(1) delegation of management authority for the operation of the facility and services;</p> <p>(2) criteria for admission;</p>			

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<p>(3) criteria for discharge;</p> <p>(4) admission assessments, including:</p> <p>(A) who will perform the assessment; and</p> <p>(B) time frames for completing assessment.</p> <p>(5) client record management, including:</p> <p>(A) persons authorized to document;</p> <p>(B) transporting records;</p> <p>(C) safeguard of records against loss, tampering, defacement or use by unauthorized persons;</p> <p>(D) assurance of record accessibility to authorized users at all times; and</p> <p>(E) assurance of confidentiality of records.</p> <p>(6) screenings, which shall include:</p> <p>(A) an assessment of the individual's presenting problem or need;</p> <p>(B) an assessment of whether or not the facility can provide services to address the individual's needs; and</p> <p>(C) the disposition, including referrals and recommendations;</p>			
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<p>(7) quality assurance and quality improvement activities, including:</p> <p>(A) composition and activities of a quality assurance and quality improvement committee;</p> <p>(B) written quality assurance and quality improvement plan;</p> <p>(C) methods for monitoring and evaluating the quality and appropriateness of client care, including delineation of client outcomes and utilization of services;</p> <p>(D) professional or clinical supervision, including a requirement that staff who are not qualified professionals and provide direct client services shall be supervised by a qualified professional in that area of service;</p> <p>(E) strategies for improving client care;</p> <p>(F) review of staff qualifications and a determination made to grant treatment/habilitation privileges;</p> <p>(G) review of all fatalities of active clients who were being served in area-operated or contracted residential programs at the time of death;</p> <p>(H) adoption of standards that assure operational and programmatic performance meeting applicable standards of practice. For this purpose, "applicable standards of practice" means a level of competence established with reference to the prevailing and accepted methods, and the</p>			
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<p>degree of knowledge, skill and care exercised by other practitioners in the field;</p> <p>This Rule is not met as evidenced by:</p> <p>Based on observations, record reviews and interviews, the facility failed to implement written policies for the adoption of standards that assure operational and programmatic performance meeting applicable standards of practice. The findings are:</p> <p>Cross reference: 10A NCAC 27G .0202 Personnel Requirements (V107). Based on record review and interviews, the facility failed to ensure a written job description was available for each staff position affecting 1 of 9 audited staff (the Licensed Psychologist).</p>	<p>1. Response to the allegation of Cross reference: 10A NCAC 27G .0202 Personnel Requirements (V107). Based on record review and interviews, the facility failed to ensure a written job description was available for each staff position affecting 1 of 9 audited staff (the Licensed Psychologist).</p> <p>The facility did not fail to ensure a written job description. The Licensed Psychologist is not a staff member of Licensee. LP is a separate entity with its separate NPI. Dr does not work directly with any clients. She is The Dr Licensed Psychologist who is a separate contractor who reviews service orders. 10A NCAC 27G.0202 does not require that the Licensee ensure a written job description is available for contractors.</p> <p>However, the contract that will be drawn for both parties to sign will have duties in the contract. That is where the duties are held for a contractual person.</p>	<p>1. The HR personal will monitoring the corrective action to ensure future compliance.</p>	<p>Effective 9/10/19</p>
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<p>Cross reference: 10A NCAC 27G .0202 Personnel Requirements (V108). Based on record review and interviews, the facility failed to ensure staff had training in general organizational orientation, client rights and confidentiality, training to meet the MH/dd/sa needs of the client as specified in the treatment plan and training in infectious diseases and bloodborne pathogens for 1 of 9 audited staff (the Licensed Psychologist).</p>	<p>The Dr is a Licensed Psychologist and it will be the same if the LP was in her own building and information was being brought to her location to review and sign the service orders.</p> <p>2- Cross reference: 10A NCAC 27G .0202</p> <p>Personal Requirements (V108) staff training for LP on general organization training, client rights, confidentiality for 1 OUT of 9 staff</p> <p>A License Clinician have to have client rights training, confidential training in order to get your license and to update your license.</p> <p>Licensee disagrees with this finding, as Licensee is not required to train non-staff members and those who are contracted with Licensee unless that non-staff member or contractor is involved with the direct care of recipients, which the LP is not.</p> <p>However; based on the file review (The Dr-LP's file, she has her signed security</p>	<p>2 – The hiring staff will make sure the description of the work is in the contract</p>	<p>2- 9/16/2019</p>
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<p>Cross reference: 10A NCAC 27G .0203 Competencies of Qualified Professionals and Associate Professionals (V109). Based on record reviews and interviews, 1 of 1 Licensed Psychologist and the Licensee failed to demonstrate the knowledge, skills and abilities required by the population served.</p>	<p>of confidential information training, oOverview of prPrivacy policies/cConfidentiality and on-disclosures agreement, cConfidential agreement for visitors in clinical areas, aAssurance of cConfidentiality, and cClient rRights nNotification for sStaff. Dr LP also had orientation training and she signed that she had all training. There wasn't a certificate for the training, but she signed that she received it. The only thing is not in the file is bloodborne and for the type of contract service she provides, bloodborne is not required unless she is working with clients directly. Any training required by that the LP to fulfill is not a duty of Licensee as the Licensee does not employ the LP.</p> <p><i>Please view what was in file during the review by DHSR</i></p> <p>Licensee disagrees with the findings,</p>	<p>3 – Director will ensure that all Level of Degrees are knowledgeable</p>	<p>3- 9/16/19</p>
	<p>3- Cross Reference 10A NCAC 27G .0203 Competencies of Qualified Professional and Associate Professional (V109). Based 1 of 1 DR Psychologist and</p>		

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	<p>Licensee</p> <p><u>Licensee disagrees with the findings.</u></p> <p><u>DHSR is inaccurate is finding Licensee out of compliance with an administrative code stating the compoentencies of a QP or AP. Licensed Psychologists have completely different standards; therefore this finding is moot. AP requirements are different than an AP/License Clinician of all types</u></p> <p><u>10A NCAC 27G .0104 STAFF DEFINITIONS</u></p> <p>AP: per this definitions neither party <u>the mentioned Licensee and LP mention do not falls</u> under this category</p> <p>QP: "Qualified professional" means, within the MH/DD/SA system of care either:</p> <p>(a) an individual who holds a license, provisional license, certificate, registration or permit issued by the governing board regulating a human service profession, except a registered nurse who is licensed to practice in the State of North Carolina by the North</p>		
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	<p>Carolina Board of Nursing who also has four years of full-time accumulated experience in MH/DD/SA with the population served;</p> <p><u>Even if this Statement of Deficiencies is attempting to accuse Licensee's QP and AP to be out of compliance, then this finding would still be wrong.</u></p> <p>The Licensee is covered by her License and intensive training and dual dx as well as LCASA, CSAC, ADETS Certified, shows Licensee meets the knowledge and competence set forth in this statement- and meets the requirements specified for CCS, LCAS, LCAS-A, and CSAC under Article 5C. <u>Therefore, Licensee</u> may deliver SAIOP & SACOT under the Clinical Coverage Policy NO:8-A Facility licensed under 10A NCAC 27G .4400. <u>Licensee disagrees with the findings,</u></p> <p>As well the Psychologist obtaining a PHD and that precede an AP. As a licensee Psychologist, knowledge and competency comes with obtaining the license. In addition, the DR stated, "I</p>		
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<p>Cross reference: 10A NCAC 27G 0604 Incident Reporting Requirements for Category A and B Providers (V367). Based on record reviews and interviews, the facility failed to report 3 of 3 Level III incidents to the Local Management Entity Continued From page 3 (LME) within 72 hours of becoming aware of the incident.</p> <p>Review on 8/15/19 of the facility's Plan of Protection, dated 8/15/19 and written by the Licensee revealed:</p> <p>"What immediate action will the facility take to ensure the safety of the consumers in your care? Have the staff go back and finish the incident reports and make sure they understand the thumbs up, go over with [the Licensed Psychologist], confidentiality, client rights and contract, will contact DHSR (Division of Health Service Regulation) to ask about renting space with [the Licensed Psychologist] and have her not sign assessments as it is not required.</p> <p>Describe your plans to make sure the above happens. [The Corporate Compliance Officer (CCO)] will be addressed on 8/15/19 regarding his connections with clients' living. It will be followed up, documented and completed on 8/16/19. When [the Licensed Psychologist] is</p>	<p>never told DHSR I had no knowledge of Substance when she has some clients with Dual dx" Per Dr, "I told DHSR I do not work with a lot of SA patience. Review on 8/15/19 of the facility's Plan of Protection, dated 8/15/19 and written by the Licensee revealed:</p> <p>go over with [the Licensed Psychologist], confidentiality, client rights and contract (see statement above), will contact DHSR (Division of Health Service Regulation) to ask about renting space with [the Licensed Psychologist] -The state was called, and a message was left. However, the LP will not be renting space anymore. LP will not sign assessments.</p> <p>.10A NCAC 27G .0104 STAFF DEFINITION However, Dr will incorporate more SA related trainings</p> <p>4 – Cross Reference 10A NCAC 27G 0604 incident reporting requirements for Category A and B providers (V367)</p>	<p>4- Director will monitor this process</p> <p>YOU DO HAVE TO REPORT LEVEL III WITH 72 HOURS. BUT WHAT CONSTITUTE LEVEK IV->?</p>	<p>4- 9/16/19</p>
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Commented [KE1]: I do not see the reason to include all this. You address the accusations. I don't even want to say that "she won't be renting the space anymore." Let's chat.

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Commented [KE2]: **0A NCAC 27G .0602 DEFINITIONS**
In addition to the terms defined in G.S. 122C-3 and Rules .0103 and .0104 of this Subchapter, the following terms shall apply to the rules in this Section:
(1) "Complaint investigation" means the process of determining if an allegation made against a provider concerning the provision of public services is substantiated.
(2) "ICF/MR" means a facility certified for Medicaid as an Intermediate Care Facility for the Mentally Retarded.
(3) "Level I incident" means the same as defined in 10A NCAC 27G .0103(b)(32) and does not meet the definition of a level II incident or level III incident.
(4) "Level II incident" means the same as defined in 10A NCAC 27G .0103(b)(32), including a client death due to natural causes or terminal illness, or results in a threat to a client's health or safety, or a threat to the health or safety of...

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<p>present next time. We will have an outside person/Qualified Professional to do confidentiality training and clients rights."</p> <p>This facility was licensed for three service categories: Substance Abuse Intensive Outpatient Program, Substance Abuse Comprehensive Outpatient Treatment and Psychosocial Rehabilitation. Current and former clients audited had diagnoses of Hepatitis C, illicit substance use (Marijuana, Cocaine, Methamphetamine, Opiates), alcohol use, and mental health diagnoses. A Licensed Psychologist with no knowledge or experience in the area of substance abuse, was contracted to sign service notes and Comprehensive Clinical Assessments. The Licensee had not provided her with any training regarding clients with substance</p>	<p>Regarding the incident reports, once the agency find that there is a death, we report it to the IRIS system.</p> <p>It was evident that the 3 incidents was properly done but not completed by hitting the "Thumb's up". -"What immediate action will the facility take to ensure the safety of the consumers in your care? Have the staff go back and finish the incident reports and make sure they understand the thumbs up, The agency did not fail to report any death. Once a client is discharge and die within 60 days of discharge the last home agency must conduct the incident reporting. In order for a report to be completed, you must be aware. Once you are aware then you have 72 hours of being aware to submit.</p> <p>Going forward, there will be a sign-in log for incidents such as this to make sure a print out of the system stating "Thumbs up completed" is printed out and placed in the binder for secure verification of completion.</p> <p>5-COO was addressed on 8/15 regarding the State DHSR concern</p>	<p>5-Director will monitor the amount of time is giving toward living situation. Once the client is referred for assistance then the new resource will</p>	<p>8/16/19</p>
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<p>5- The Corporate Compliance Officer (CCO) will be addressed</p>	<p>about his dual role with helping clients outside of the agency with their living and conducting case management. (which is the service definition).</p>	<p>handle the living at that point</p>	
	<p>Per Clinical Coverage 8A SAIOP & SACOT includes a. case management to arrange, link or integrate multiple services; and b. assessment and reassessment of the beneficiary's need for services. SAIOP & SACOT services also: a. informs the beneficiary about benefits, community resources, and services; b. assist the beneficiary in accessing benefits and services; c. arrange for the beneficiary to receive benefits and services; and d. monitor the provision of services.</p>		
	<p>This is done consistently with all clients. Ready4Change as placed, linked and help all the clients who wanted the help to obtain housing, get clean, link to doctors, dentist, inpatient, food, Support groups, peer support, TLCI (housing SHC- three qualified and 4 didn't 2 is on the processing list). Licensee disagrees with the findings.</p>		<p>6) -9/16/19</p>

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<p>This facility was licensed for three service categories: Substance Abuse Intensive Outpatient Program, Substance Abuse Comprehensive Outpatient Treatment and Psychosocial Rehabilitation. Current and former clients audited had diagnoses of Hepatitis C, illicit substance use (Marijuana, Cocaine, Methamphetamine, Opiates), alcohol use, and mental health diagnoses. A Licensed Psychologist with no knowledge or experience in the area of substance abuse, was contracted to sign</p>	<p>6- The LP does have some knowledge (Per her statement to Licensee, "I never told DHSR that I had no knowledge) A job description is not required for any Contractor for service order per Coverage Clinical 8A. However, she has a contract as of 9/10 that states her service.</p> <p>7 – The allegation of staff indicated that the licensee had her to back date her contract (cross reference with (V109)Staff #7 Regina Allen 1) The contractual person was given the contract on the orientation day and prior to her start date via email.(see attached email) The person that handled HR items failed to make sure it was done. When it was identified that it was missing, the contractual indicated that "yes it was told to her to have it back, but I refused to sign it because I did not want to do ADETS since I have that as</p>	<p>6- The Director will monitor contractor</p> <p>7) HR will make sure all staff have all documents needed for employment before beginning the job</p>	<p>7) 9/16/19</p>
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<p>service notes and Comprehensive Clinical Assessments. The Licensee had not provided her with any training regarding clients with substance abuse issues and failed to ensure a written job description was available for her.</p> <p>The Licensee required current and former staff to sign and backdate personnel documentation.</p>	<p>my business". Contractual was advised that she was hired to conduct groups for ADETS as well and if she didn't want the contract work, she should have ended her contract. She was told by Licensee that she had been paid to work since starting. If She was not going to sign that means she does not agree to continue to work because her contract should have been signed the date it was given. So, the contractor was prompted to sign the date she was given the documents.</p> <p>A staff signing her contract the date it was given is not detrimental to the health, safety and welfare of the client. It is not unethical Whether they have a contract or not, that in no way interferes with the client services. Licensee disagrees with the findings.</p> <p>2) Staff#11 Celenia Martinez was not truthful with this statement that she was told to sign documents when LME was there. She was giving orientation when she was a p/t contractor and then she came on board as an employee then she requested to go back to a contractor P/T because she hated working with this</p>		
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	<p>population and especially those who does drugs because of her family background. She was never asked to back date any documents. Licensee disagrees with the findings.</p>		
	<p>However, because of the manipulation from these employees, R4C will make sure HR has a better system to follow to ensure no staff or contractor start working until all documentation is signed and dated at the time they are in orientation.</p>		
	<p>8- Licensee never instructed staff not to cross names off any sign-in. The rules are if a client is more than 15 minutes late, they have to stay to make up their time. If a client is not going to stay to make up their time, then their name is crossed out (As DHSR saw) and they are Not billed on (As DHSR saw). The Licensee has refused plenty of clients and sent them home from being late etc. Licensee disagrees with the findings</p>		<p>9/16/2019</p>
	<p>9- Licensee does not ask anyone to do anything that is unethical. This</p>		

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	<p>statement is false.</p> <p>10) This has been addressed above (4)</p>	<p>HR</p> <p>n/a</p>	
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<p>She instructed staff not to cross client names off the group therapy attendance sheet because the program billed for clients that attended regardless of how long they were present in group.</p> <p>The Licensee requested a former staff document that she had provided therapy for a client that she had not interacted with on that day.</p>		<p>n/a</p>	
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<p>The facility failed to submit level III incident reports or notify the Department of the deaths of 3 clients that had been receiving services in the program. These practices are detrimental to the health, safety and welfare of the clients and constitute a Type B rule violation.</p>			
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Reference to the out of compliance Issue	Description of how Corrections will be made	Responsibility for Monitoring the Corrective Action	Timetable for the implementation of the corrective actions
<p>(27G .0202 (A-E) Personnel Requirements</p> <p style="text-align: center;">10A NCAC 27G .0202 PERSONNEL REQUIREMENTS</p> <p>(a) All facilities shall have a written job description for the director and each staff position which:</p> <p>(1) specifies the minimum level of education, competency, work experience and other qualifications for the position;</p> <p>(2) specifies the duties and responsibilities of the position;</p> <p>(3) is signed by the staff member and the supervisor; and</p> <p>(4) is retained in the staff member's file.</p> <p>(b) All facilities shall ensure that the director, each staff member or any other person who provides care or services to clients on behalf of the facility:</p>			

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<p>(1) is at least 18 years of age; (2) is able to read, write, understand and follow directions; (3) meets the minimum level of education, competency, work experience, skills and other qualifications for the position; and (4) has no substantiated findings of abuse or neglect listed on the North Carolina Health Care Personnel Registry.</p> <p>(c) All facilities or services shall require that all applicants for employment disclose any criminal conviction. The impact of this information on a decision regarding employment shall be based upon the offense in relationship to the job for which the applicant is applying.</p> <p>(d) Staff of a facility or a service shall be currently licensed, registered or certified in accordance with applicable state laws for the services provided.</p> <p>(e) A file shall be maintained for each individual employed indicating the training, experience and other qualifications for the position, including verification of licensure, registration or certification.</p> <p>-No hire date; -No job description.</p> <p>Interview on 8/12/19 with the Licensed Psychologist revealed:</p> <p>-She had been a contract employee for 2 years and rented office space from the Licensee</p>			
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<p>located inside the licensed facility;</p> <p>-She reviewed and signed service notes and Comprehensive Clinical Assessments (CCAs) for all the clients that the facility served;</p> <p>-The Licensee had verification of her education which was all she was asked to provide or sign.</p> <p>Interview on 8/15/19 with the Licensee revealed:</p> <p>-The Licensed Psychologist was a contract employee and rented office space inside the licensed facility;</p> <p>-The Licensed psychologist signed the clients' service notes and CCAs;</p> <p>-It was common practice in the field to have a nurse or doctor sign service notes and CCAs;</p> <p>-She was not aware that contract workers were considered staff.</p> <p>This deficiency is crossed referenced into 10A NCAC 27G .0201 Governing Body Policies (V105) for a Type B rule violation.</p>	<p>Per 10A NCAC 27G .0202 Personal Requirements Job description are for individual that have a Staff Position</p> <p>-License Psychologist (LP) is not a staff nor, does she provide direct care service to clients -Licensee disagrees with these finding However; a contract was bonded between the LP & Licensee</p>	<p>-The HR personal will monitoring the corrective action</p>	<p>Effective 9/10/19</p>
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<p>27G .0202 (F-I) Personnel Requirements</p> <p>10A NCAC 27G .0202 PERSONNEL REQUIREMENTS</p> <p>(f) Continuing education shall be documented.</p> <p>(g) Employee training programs shall be provided and, at a minimum, shall consist of the following:</p> <p>(1) general organizational orientation;</p> <p>(2) training on client rights and confidentiality as delineated in 10A NCAC 27C, 27D, 27E, 27F and 10A NCAC 26B;</p> <p>(3) training to meet the mh/dd/sa needs of the client as specified in the treatment/habilitation plan; and</p> <p>(4) training in infectious diseases and bloodborne pathogens.</p> <p>(h) Except as permitted under 10a NCAC 27G .5602(b) of this Subchapter, at least one staff member shall be available in the facility at all times when a client is present. That staff member shall be trained in basic first aid including seizure management, currently trained to provide cardiopulmonary resuscitation and trained in the</p>			
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FOR
Intent to Revoke License MHL#041-1069**

<p>Heimlich maneuver or other first aid techniques such as those provided by Red Cross, the American Heart Association or their equivalence for relieving airway obstruction.</p> <p>(i) The governing body shall develop and implement policies and procedures for identifying, reporting, investigating and controlling infectious and communicable diseases of personnel and clients.</p> <p style="text-align: center;">This Rule is not met as evidenced by:</p> <p>Based on record review and interviews, the facility failed to ensure staff had training in general organizational orientation, client rights and confidentiality, training to meet the mh/dd/sa needs of the client as specified in the treatment plan and training in infectious diseases and bloodborne pathogens for 1 of 9 audited staff (the Licensed Psychologist). The findings are:</p> <p>Review on 8/12/19 of the Licensed Psychologist's personnel record revealed:</p> <p style="text-align: center;">-No hire date;</p> <p style="text-align: center;">-No job description;</p> <p style="text-align: center;">-No documentation of training in general</p>	<p>Licensee disagrees with this finding, as Licensee is not required to train non-staff members and those who are contracted with Licensee unless that non-staff member or contractor is involved with the direct care of recipients, which the LP is not.</p> <p>There are trainings in the LP file (see attached) DHSR failed to list these signed trainings from LP and Licensee</p> <p>Licensee disagrees with this finding, as</p>	<p>2 – The hiring staff will make sure that contracts are in the file of all individual contractor</p>	<p>2- 9/16/2019</p>
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>organizational orientation, client rights and confidentiality, training to meet the mh/dd/sa needs of the client as specified in the treatment plan and training in infectious diseases and bloodborne pathogens.</p> <p>Interview on 8/12/19 with the Licensed Psychologist revealed:</p> <ul style="list-style-type: none"> -She had been a contract employee for 2 years and rented office space from the Licensee located inside the licensed facility; -She reviewed and signed service notes and Comprehensive Clinical Assessments (CCAs) for all the clients that the facility served; -The Licensee had verification of her education which was all she was asked to provide or sign; -She had received no additional training from the Licensee. <p>Interview on 8/15/19 with the Licensee revealed:</p> <ul style="list-style-type: none"> -The Licensed Psychologist was a contract employee and rented office space; -The Licensed Psychologist signed the clients service notes and CCAs; <p>-It was common practice to have a doctor or nurse to sign service notes and CCAs in the field;</p>	<p>Licensee is not required to train non-staff members and those who are contracted with Licensee unless that non-staff member or contractor is involved with the direct care of recipients, which the LP is not.</p> <p>However; based on the file review the LP's file, she has her signed security of confidential information training, overview of privacy polices/confidentiality and on-disclosures agreement, confidential agreement for visitors in clinical areas, assurance of confidentiality, and client rights notification for staff. LP also had orientation training and she signed that she had all training. Any training required by that the LP to fulfill is not a duty of Licensee as the Licensee does not employ the LP.</p>	<p>Ready 4 Change (r4c)HR ensure that all members of the team understand and train each indivial on Client Rights & Confidentiality</p>	<p>ongoing</p>
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>-She was not aware that contract employees were required to have training;</p> <p>-"So, you're telling me an MD (medical doctor) and Licensed Psychologist must have this;"</p> <p>-"MD's have an issue with having this (training)."</p> <p>This deficiency is crossed referenced into 10A NCAC 27G .0201 Governing Body Policies (V105) for a Type B rule violation.</p> <p>27G .0203 Privileging/Training Professionals</p>			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>10A NCAC 27G .0203 COMPETENCIES OF QUALIFIED PROFESSIONALS AND ASSOCIATE PROFESSIONALS</p> <p>(a) There shall be no privileging requirements for qualified professionals or associate professionals.</p> <p>(b) Qualified professionals and associate professionals shall demonstrate knowledge, skills and abilities required by the population served.</p> <p>(c) At such time as a competency-based employment system is established by rulemaking, then qualified professionals and associate professionals shall demonstrate competence.</p> <p>(d) Competence shall be demonstrated by exhibiting core skills including:</p> <ul style="list-style-type: none">(1) technical knowledge;(2) cultural awareness;(3) analytical skills;(4) decision-making;(5) interpersonal skills;(6) communication skills; and			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>(7) clinical skills.</p> <p>(e) Qualified professionals as specified in 10A NCAC 27G .0104 (18)(a) are deemed to have met the requirements of the competency-based employment system in the State Plan for MH/DD/SAS.</p> <p>(f) The governing body for each facility shall develop and implement policies and procedures for the initiation of an individualized supervision plan upon hiring each associate professional.</p> <p>(g) The associate professional shall be supervised by a qualified professional with the population served for the period of time as specified in Rule .0104 of this Subchapter.</p> <p>This Rule is not met as evidenced by:</p> <p>Based on record reviews and interviews, 1 of 1 Licensed Psychologist and the Licensee failed to demonstrate the knowledge, skills and abilities required by the population served. The findings are:</p> <p>Review on 8/12/19 of the Licensed Psychologist's personnel record revealed:</p>			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p style="text-align: center;">-No hire date;</p> <p style="text-align: center;">-No job description;</p> <p style="text-align: center;">-Educational documentation that she is a Licensed Psychologist.</p> <p>Review on 8/2/19 of the Licensee's personnel record revealed documentation that she meets the educational requirements of a Licensed Clinical Addictions Specialist Associate (LCAS-A).</p> <p style="text-align: center;">Finding 1:</p> <p>Interview on 8/12/19 with the Licensed Psychologist revealed:</p> <p style="text-align: center;">-She had been a contract employee for 2 years and rented office space from the Licensee that was located inside the licensed facility;</p> <p style="text-align: center;">-She provided services to her own private clients but had never provided services to the clients attending the substance abuse treatment programs;</p> <p style="text-align: center;">-"I was told by [the Licensee] to tell you I have no direct contact with their clients, and I was a contract worker;"</p> <p style="text-align: center;">-She was paid weekly to sign the service notes and</p>	<p style="text-align: center;">These statements have already been addressed on the first page and above. Licensee disagrees with the findings</p>	<p style="text-align: center;">Director will monitor this process</p>	<p style="text-align: center;">9/16/19</p>
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>the Comprehensive Clinical Assessments (CCAs) that were completed by the therapists and the Clinical Director;</p> <p>-She was never asked to provide feedback on the documents she signed;</p> <p style="padding-left: 40px;">-She didn't feel qualified due to her lack of experience in substance abuse to provide feedback;</p> <p>-She had never worked with substance abuse clients;</p> <p style="padding-left: 40px;">-She was not aware of the standard of care for the clients;</p> <p style="padding-left: 80px;">-"It would be helpful to know that;"</p> <p>- "I just assume they (facility staff) know what they are doing when they assess these patients;"</p> <p>-She thought she had to sign the service notes and CCAs for the facility to get paid;</p> <p>-She dated the service notes and CCAs the same date they were completed regardless of whether she had signed them the same day.</p> <p>Interview on 8/2/19 with the Clinical Director revealed the Licensed Psychologist had been signing CCAs and service notes since before she had taken</p>	<p>Licensee Disagree with the statement. All these other statements LP denies quotes. The quote was distorted from the original content, Per LP.</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>the Clinical Director position.</p> <p>Interview on 8/15/19 with the Licensee revealed:</p> <ul style="list-style-type: none">-She was not aware the Licensed Psychologist had no experience with substance abuse;-"She said that (no experience with substance abuse) ...are you freaking kidding me ...oh my gosh ...Jesus, Father to God ...I don't believe she actually said that;"-She was no longer going to have the Licensed Psychologist sign service notes or CCAs;-She was not sure why the Clinical Director asked the Licensed Psychologist to start signing the documents.			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p style="text-align: center;">Finding 2:</p> <p>Interview on 8/12/19 with former staff #11 revealed:</p> <ul style="list-style-type: none"> -She was asked by the Licensee to document a therapy note for a client that she had not provided therapy for on that day; -The client had been removed from group because she was upset and crying; -The Corporate Compliance Officer (CCO) talked with the client about her issues; -The CCO didn't meet the qualifications to provide therapy so she was instructed to ask him what he discussed with the client and then write a therapy note; -She had consulted with her Certified Substance Abuse Counselor Associate supervisor and they advised her not to write the therapy note so she refused. <p>Interview on 8/15/19 with the Licensee revealed:</p> <ul style="list-style-type: none"> -She thought there may have been a misunderstanding between her and former staff #11; -She had probably asked the staff to write a note and 	<p>#11 Licensee only asked that Counselors to document in their group note if for any reason that individual felt the need to leave group to speak with a therapist. Also asked for the Counselor to meet with Therapist to determine how best to help client in group which is evident base practice.</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>not a therapy note;</p> <p>-The client should have seen her therapist if she was upset rather than the CCO.</p> <p>Finding 3:</p> <p>Interview on 8/5/19 with client #7 revealed:</p> <p>-"I was told by [the Licensee] I best be on my best behavior or [the CCO] is going to kick us out (of the apartments and the substance abuse program);"</p> <p>-"This is crazy ...people out here is scared to talk."</p> <p>Interview on 8/15/19 with the Licensee revealed:</p> <p>-"I was sending everyone in here (in the conference room);"</p> <p>-"I told them all (clients) to be on their best behavior because none of them know how to act."</p>	<p>#3 finding: Licensee did not make this statement to anyone.</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>Finding 4:</p> <p>Interview on 8/12/19 with former staff #11 revealed:</p> <ul style="list-style-type: none">-She was hired as a contract therapist in April 2019 and then as a full-time therapist in May;-An article was printed in June 2019 reflecting the agency in a negative light;-The Local Management Entity/Managed Care Organization (LME/MCO) investigated the facility shortly after the article was printed;-The Licensee realized former staff #11 had never signed personnel paperwork while the LME/MCO was at the facility;-The Licensee informed her she had to immediately sign her personnel paperwork and back date all the information.	<p>#11 Training was completed prior to employment and Licensee in the process of reviewing personal file realized that staff had not signed document through what was thought to be an oversight. So it was asked that staff sign the document the date of the actual training..</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>Interview on 8/9/19 with staff #7 revealed:</p> <ul style="list-style-type: none"> -She had been employed since May 2019; -She had been instructed to do something unethical by the Licensee; -The Licensee realized when the LME/MCO was at the facility in June 2019 that the staff had not completed her personnel paperwork; -The Licensee instructed the staff to sign and back date the paperwork to when she had begun working; <li style="padding-left: 40px;">-"I did and I'm really sorry ...I feel so bad." <p>Interview on 8/15/19 with the Licensee revealed:</p> <ul style="list-style-type: none"> -Former staff #11 worked as a part time employee for 1 ½ months and then was hired full time; -She had completed the trainings with the staff but wasn't able to get her to sign the paperwork at that time; -Staff #7 refused to sign her personnel paperwork when it was provided to her; -Changes were made to the personnel paperwork to 	<p>#7 The office manager was told by #7 that she refused to sign. Once the Licensee found out, she prompt her to sign the document. Contractor was hired as a contractual member who received her contract via email before starting and reviewed the contract upon starting employment. Office Manager is responsible for getting all HR items completed. It was identified that it wasn't signed.</p> <p>Once the licensee was aware it wasn't signed, she address the issue with #7</p>	<p>Director will make sure all documents are completed before new employment</p>	<p>7) 9/16/19</p>
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>accommodate the staff;</p> <p>-The staff was informed she had to either sign and date the paperwork reflecting the day she</p> <p>was provided with the first set of paperwork or she would no longer be employed; -She had informed the staff " ...you're not gonna have me jacked up."</p> <p style="text-align: center;">Finding 5:</p> <p style="text-align: center;">Interview on 8/9/19 with staff #7 revealed:</p> <p>-When clients arrived at group after 2nd break or left early, she marked their name off the attendance sheet;</p> <p>-She felt that clients that didn't attend at least half the program hours should not get credit for attending and the program should not bill for them;</p> <p>-She had been instructed by the Licensee approximately a couple of months ago to not cross off names on the attendance sheet because the program billed for clients that attended regardless of how long they were present;</p> <p>-She had continued to cross off client names on the attendance sheet.</p>	<p>Licensee disagrees with the statement. Not one individual that was not in attendance the entire group session has been billed on. Licensee has always been clear with individuals and staff of attendance and times requirements. As evidence shows not 1 client was billed that was marked out on sign in logs.</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>Review on 8/9/19 of group attendance sheets revealed:</p> <ul style="list-style-type: none">-On 7/15/19, client #7 was crossed out by staff #7;-On 7/16/19, client #28 was crossed out by staff #7;-On 7/18/19, client #29 was crossed out by staff #7. <p>Interview on 8/15/19 with the Licensee revealed:</p> <ul style="list-style-type: none">-She had not informed staff #7 to stop crossing names off the attendance sheets;-She had met with the clients and informed them if they were late arriving to the program then they were required to stay late to make up their time;-"I'm very clear with clients and staff ...you can't come and leave ...we have to be able to bill for the entire time." <p>This deficiency is crossed referenced into 10A NCAC 27G .0201 Governing Body Policies (V105) for a Type B rule violation</p>			
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

Reference to the out of compliance Issue	Description of how Corrections will be made	Responsibility for Monitoring the Corrective Action	Timetable for the implementation of the corrective actions
<p>27G .0404 (F-L) Operations During Licensed Period</p> <p>10A NCAC 27G .0404 OPERATIONS DURING LICENSED PERIOD</p> <p>(f) DHSR shall conduct inspections of facilities without advance notice.</p> <p>(g) Licenses for facilities that have not served any clients during the previous 12 months shall not be renewed.</p> <p>(h) DHSR shall conduct inspections of all 24-hour facilities an average of once every 12 months, to occur no later than 15 months as of July 1, 2007.</p> <p>(i) Written requests shall be submitted to DHSR a minimum of 30 days prior to any of the following changes:</p> <p>(1) Construction of a new facility or any renovation of an existing facility;</p> <p>(2) Increase or decrease in capacity by program service type;</p>			

Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>(3) Change in program service; or</p> <p>(4) Change in location of facility.</p> <p>(j) Written notification must be submitted to DHSR a minimum of 30 days prior to any of the following changes:</p> <p>(1) Change in ownership including any change in partnership; or</p> <p>(2) Change in name of facility.</p> <p>(k) When a licensee plans to close a facility or discontinue a service, written notice at least 30 days in advance shall be provided to DHSR, to legally responsible persons of all affected clients. This notice shall address continuity of services to clients in the facility.</p> <p>(l) Licenses shall expire unless renewed by DHSR for an additional period. Prior to the expiration of a license, the licensee shall submit to DHSR the following information:</p> <p>(1) Annual Fee;</p> <p>(2) Description of any changes in the facility since the last written notification was submitted;</p> <p>(3) Local current fire inspection report;</p> <p>(4) Annual sanitation inspection report, with the exception of a day/night or periodic service that does not</p>			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>handle food for which a sanitation inspection report is not required; and</p> <p>(5) The names of individuals who are owner, partners or shareholders holding an ownership or controlling interest of 5% or more of the applicant entity.</p> <p>This Rule is not met as evidenced by:</p> <p>Based on observations, record review and interviews, the facility failed to submit a written request to the Division of Health Service Regulation (DHSR), a minimum of 30 days prior to a change in a program service. The findings are:</p> <p>Observation on 8/2/19, at approximately 9:00am, of the facility's license revealed the facility was licensed for the following service categories: 10A NCAC 27G .1200 Psycho Social Rehabilitation (PSR) for Individuals with Severe and Persistent Mental Illness, 10A NCAC 27G .4400 Substance Abuse Intensive Outpatient Program (SAIOP) and</p>	<p>Licensee disagrees with findings</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>10A NCAC 27G .4500 Substance Abuse Comprehensive Outpatient Treatment Program (SACOT).</p> <p>Observation on 8/8/19, at approximately 9:12 am, of the facility revealed:</p> <ul style="list-style-type: none">-Two hallways of suites with numerous offices;-The second hallway did not have a separate front entrance from the first hallway;-A Licensed Psychologist's office was located across from the computer lab;-A lab and phlebotomist were located across from the first group meeting room. <p>Review on 8/2/19 of the facility's pamphlet of services offered revealed:</p> <p>-The licensed facility provided other services in addition to the PSR, SAIOP and SACOT which included:</p> <ul style="list-style-type: none">-Outpatient Therapy;-Mental/Behavioral Health Treatment;-Medication Management;-Assessments/Diagnosis;	<p>These services were applied for and approved during the same time of Licensing for IOP/PSR/SACOT. In order for one to conduct these services, you have to be able to conduct an Assessment, monitor for both MH/SA and medication</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>-Ex-Offender Services; -Sex-Offender Treatment; -Court Ordered Evaluations/Services; -Crisis Intervention/Services; -Suboxone; -12 Panel Drug Testing; -Grief/Trauma Counseling.</p> <p>Interview on 8/9/19 with staff #2 revealed the facility provided services other than what they were licensed for which included outpatient therapy and driving while impaired assessments and services.</p>	<p>management. How can you properly provide SA service without having the ability to provide drug testing? All SA programs have urine collected at the office and sent off for collection. Licensee has had a Survey done and no one ever said anything about the service. These services are not required to have license.</p> <p>In addition, the service definition for SACOT & SAIOP states, you must provide outpatient therapy.</p> <p>12 panel drug testing is just the type of test used. Suboxone hasn't began nor has crisis intervention services (which falls under outpatient therapy) with the others. Which was just added to the brochure. Licensee is in fact holds a current License by the DHHS for DWI</p> <p>Licensee disagrees with findings</p>	<p>n/a = Disagree with findings</p>	<p>N/A</p>
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>Interview on 8/12/19 with the Licensed Psychologist revealed:</p> <p>-She was a contract employee for the facility and was responsible for signing Comprehensive Clinical Assessments for the clients in the substance abuse programs; -She rented an office in the licensed suites from the Licensee in order to provide the following services to her patients not attending the facility programs: psychological treatment, therapy for children, adolescents, individual adults, couples and families.</p> <p>Interview on 8/9/19 with the Phlebotomist revealed:</p> <p>-She was employed by an independent company that was contracted by the facility;</p> <p>-The contract specified that she was provided a lab/office within the facility;</p> <p>-She was responsible for collecting urine screenings, mouth swabs and blood draws for all the services provided by the facility.</p> <p>Interview on 8/15/19 with the Licensee revealed:</p> <p>-She was not aware that she was required to notify DHSR prior to providing services other than the services she was licensed for;</p> <p>-"You mean I have all these empty offices and I can't rent them out;"</p>	<p>Licensee disagree with the findings and I was not aware that resources you need to help meet the best evidence-based practice for the client (non-licensed affiliated) was to be brought to the attention of DHSR (if it was not a license service that DHSR is affiliated with regulating such as a Day program, Group homes etc.</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>-She had been licensed by the LME (Local Management Entity) to provide medication management, outpatient therapy and court ordered evaluations and services</p> <p>27G .0604 Incident Reporting Requirements</p> <p>10A NCAC 27G .0604 INCIDENT REPORTING REQUIREMENTS FOR CATEGORY A AND B PROVIDERS (a) Category A and B providers shall report all level II incidents, except deaths, that occur during the provision of billable services or while the consumer is on the providers premises or level III incidents and level II deaths involving the clients to whom the provider rendered any service within 90 days prior to the incident to the LME responsible for the catchment area where services are provided within 72 hours of becoming aware of the incident. The report shall be submitted on a form provided by the Secretary. The report may be submitted via mail, in person, facsimile or encrypted electronic means. The report shall include the following information:</p> <p>(1) reporting provider contact and identification information;</p> <p>(2) client identification information;</p> <p>(3) type of incident;</p>			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>(4) description of incident;</p> <p>(5) status of the effort to determine the cause of the incident; and</p> <p>(6) other individuals or authorities notified or responding.</p> <p>(b) Category A and B providers shall explain any missing or incomplete information. The provider shall submit an updated report to all required report recipients by the end of the next business day whenever:</p> <p>(1) the provider has reason to believe that information provided in the report may be erroneous, misleading or otherwise unreliable; or</p> <p>(2) the provider obtains information required on the incident form that was previously unavailable.</p> <p>(c) Category A and B providers shall submit, upon request by the LME, other information obtained regarding the incident, including:</p> <p>(1) hospital records including confidential information;</p> <p>(2) reports by other authorities; and</p> <p>(3) the provider's response to the incident d) Category A and B providers shall send a copy of all level III incident reports to the Division of Mental Health, Developmental Disabilities and Substance Abuse Services within 72 hours of becoming aware of the incident. Category A providers shall send a copy of all level III incidents</p>			
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>involving a client death to the Division of Health Service Regulation within 72 hours of becoming aware of the incident. In cases of client death within seven days of use of seclusion or restraint, the provider shall report the death immediately, as required by 10A NCAC 26C .0300 and 10A NCAC 27E .0104(e)(18).</p> <p>(e) Category A and B providers shall send a report quarterly to the LME responsible for the catchment area where services are provided. The report shall be submitted on a form provided by the Secretary via electronic means and shall include summary information as follows:</p> <p>(1) medication errors that do not meet the definition of a level II or level III incident;</p> <p>(2) restrictive interventions that do not meet the definition of a level II or level III incident;</p> <p>(3) searches of a client or his living area;</p> <p>(4) seizures of client property or property in the possession of a client;</p> <p>(5) the total number of level II and level III incidents that occurred; and</p> <p>(6) a statement indicating that there have been no reportable incidents whenever no incidents have occurred during the quarter that meet any of the criteria as set forth in Paragraphs</p>			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>(a) and (d) of this Rule and Subparagraphs (1) through (4) of this Paragraph.</p> <p>This Rule is not met as evidenced by: Based on record reviews and interviews, the</p> <p>facility failed to report 3 of 3 Level III incidents to the Local Management Entity (LME) within 72 hours of becoming aware of the incident. The findings are:</p> <p>Review on 8/2/19 of the facility's incident reports revealed:</p> <ul style="list-style-type: none">-The facility was made aware of Deceased Client (DC #1)'s death on 11/5/18;-The facility submitted a level III incident report to Incident Response Improvement System (IRIS) on 11/14/18 which was not within the mandated time frame;-The facility was made aware of DC #2's death on 7/14/19;-The facility was made aware of DC #3's death on 3/11/19;-The facility failed to submit the level III incident reports of DC #2 and DC #3. <p>Review on 8/7/19 of the death certificates for DC's #2 and #3 revealed:</p>	<p>This was already addressed in the page 1 response (a duplicate finding)</p> <p>This was already addressed above and on the First Page</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>-DC #2 passed away on 7/14/19;</p> <p>-DC #3 passed away on 3/10/19.</p> <p>Interview on 8/7/19 with the LME revealed:</p> <p>-The facility had not submitted an incident report regarding DC #1's death within the mandated time frame of 72 hours;</p> <p>-The facility failed to submit incidents reports for DC #2 and DC #3's deaths.</p> <p>Interview on 8/15/19 with the Licensee revealed:</p> <p>-She was aware of the deaths of all 3 clients;</p> <p>-She was aware level III incident reports were to be submitted in a timely manner;</p> <p>-She was not aware the level III incident report on DC #1 was submitted late;</p> <p>-She was not aware the documentation submitted to IRIS for DC #2 and DC #3's deaths were not completed; -"The staff that learns of the deaths or incidents is responsible for submitting level III incidents into IRIS. I have nothing to do with that. I guess I am going to have to start writing people up. I guess they (facility staff) don't get them in on time or forget to hit the submit button."</p> <p>This deficiency is cross referenced into 10A NCAC 27G</p>			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>.0201 Governing Body Polices (V105) for a Type B rule violation.</p> <p>27D .0304 Client Rights - Harm, Abuse, Neglect</p> <p>10A NCAC 27D .0304 PROTECTION FROM HARM, ABUSE, NEGLIGENCE OR EXPLOITATION</p> <p>(a) Employees shall protect clients from harm, abuse, neglect and exploitation in accordance with G.S. 122C-66.</p> <p>(b) Employees shall not subject a client to any sort of abuse or neglect, as defined in 10A NCAC 27C .0102 of this Chapter.</p> <p>(c) Goods or services shall not be sold to or purchased from a client except through established governing body policy.</p> <p>(d) Employees shall use only that degree of force necessary to repel or secure a violent and aggressive client and which is permitted by governing body policy. The degree of force that is necessary depends upon the individual characteristics of the client (such as age, size and physical and mental health) and the degree of aggressiveness displayed by the client. Use of</p>			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>intervention procedures shall be compliance with Subchapter 10A NCAC 27E of this Chapter.</p> <p>(e) Any violation by an employee of Paragraphs (a) through (d) of this Rule shall be grounds for dismissal of the employee. This Rule is not met as evidenced by:</p> <p>Based on observation, record reviews and interviews the Chief Compliance Officer (CCO) and the Licensee exploited 9 of 14 audited clients (clients #1, #3, #5, #6, #7, #9, #15, #16, and #18) and 4 of 4 audited former clients (FC) (FC #19, #21, #23, and #25) that were receiving substance abuse intensive outpatient program (SAIOP) and substance abuse comprehensive outpatient treatment program (SACOT) services. The findings are:</p> <p>Interviews on 8/2/19, 8/5/19, 8/7/19, 8/8/19 and 8/14/19 with audited current and former clients from the SAIOP and SACOT programs revealed: -The THC (Transitional Housing Coordinator) solicited the clients from jails, homeless shelters and various other places to receive substance abuse services and in turn the clients would be provided housing in substandard apartments in a complex overseen by the CCO.</p>	<p>Licensee disagree with the findings and statements</p> <p>Licensee is not involved with where a client comes from. Licensee focus is helping the client to get better so that they can have a more rewarding life. To our understanding there were more than 10 clients staying in this THC that did not attend Licensee facility which indicated that Licensee is not exploiting but helping for treatment. Licensee is not directly involved with in what</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>Review on 8/2/19 of the CCO's personnel record revealed:</p> <ul style="list-style-type: none"> -A hire date of 4/1/13; <p>-A job description for an Executive Director (ED) signed and dated 4/1/13 by him and the Licensee</p> <p>-A job description for a Psychosocial Rehabilitation Qualified Professional (QP) signed and dated 5/1/13 by him and the Licensee;</p> <p>-A job description for a CCO signed and dated 7/7/13 by him and the Licensee;</p> <p>-A job description for a QP signed and dated 12/30/15 by him and the Licensee.</p> <p>Review on 8/2/19 of the Licensee's personnel record revealed:</p> <ul style="list-style-type: none"> -A hire date of 4/1/13; <p>-Verification that she met the requirements of a Licensed Clinical Practitioner and a Certified Substance Abuse Counselor Associate.</p>	<p>manner THC is running.</p>	<p>n/a</p> <p>n/a</p>	
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>Review on 8/7/19 of client #1's record revealed:</p> <p>-An admission date of 6/13/19;</p> <p>-Diagnoses of Hepatitis C (Hep C), Severe Cocaine Use Disorder, Post-Traumatic Stress Disorder (PTSD), Attention Deficit Hyperactivity Disorder (ADHD), Generalized Anxiety Disorder (GAD), Bipolar Disorder, Severe Methamphetamine Use Disorder and Severe Opioid Use Disorder.</p> <p>-An assessment dated 6/13/19 noting "receives Medicaid, receives disability, has a mental illness, drug of choice is cocaine, has no legal issues and does not require assistance with Activities of Daily Living (ADLs)"</p> <p>-A treatment plan dated 7/23/19 noting "will attend group therapy sessions to share thoughts and feelings associated with, reasons for, consequences of, feelings about, and alternatives to addiction as evidenced by attending and actively participating in Substance Abuse Comprehensive Outpatient Treatment Program (SACOT) 5 out of 5 days per week, will learn and implement personal coping skills to manage stressors and day to day challenges without the use of substances as evidenced by active participation in sessions, utilizing 2 to 3 skills per week, providing drug screens and self-report."</p> <p>Interview on 8/7/19 with client #1 revealed:</p> <p>-She attended the SACOT and received housing through the transitional housing program;</p>	<p>This is duplicate statement reworded differently</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>-The Corporate Compliance Officer (CCO) of the substance abuse facility was also the Director of the transitional housing program;</p> <p>-A Transitional Housing Coordinator (THC) was employed to oversee the transitional housing;</p> <p>-She had been informed by the THC today (8/7/19) that she had to start paying \$200 per month for case management to continue living in the transitional housing program; -"I believe someone is trying to pocket someone's money."</p> <p>Review on 8/2/19 of client #3's record revealed:</p> <p>-An admission date of 5/21/19;</p> <p>-Diagnoses of Alcohol Dependence, Bipolar Disorder and Cannabis Dependence;</p> <p>-An assessment dated 5/21/19 noting "source of income is SSI (Supplemental Security Income) of \$656 per month, has been homeless for one year, history of mental illness, no legal issues, no issues with Activities of Daily Living, history of alcohol, cocaine and marijuana use"</p> <p>-A treatment plan dated 5/24/19 noting "Will attend SACOT group as directed 4 hours a day, 5 days a week to learn about the diseases of addiction and ways he can effectively eliminate the use of mind altering substances as evidence by self-report, staff report, negative urine</p>	<p>This has nothing to do with the treatment facility of the licensee nor is the Licensee familiar with money paid out.</p> <p>Licensee disagrees with this statement. If you review urines,</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>drug screens and regular group attendance over the next 90 days, will practice effective communication skills and healthy coping skills to reduce stress and increase positive social interactions and cravings to smoke marijuana, drink alcohol and use cocaine as evidenced by self-reports."</p> <p>Interview on 8/5/19 with client #3 revealed:</p> <ul style="list-style-type: none">-He attended the SACOT program and received housing through the transitional housing program;-He was homeless when he met the THC;-The THC had informed him since he was a Medicaid recipient, he was able to attend substance abuse treatment and live in an apartment for free;-The THC had informed him after he moved into housing that she was going to schedule his assessment for substance abuse treatment;-"If you have 3 negative urine screens in a row, they (the THC) will kick you out of the program (substance abuse) and kick you out of housing;"-"Every time you miss a class you have to pay \$40 ...I don't have money for that." <p>Review on 8/7/19 of client #5's record revealed:</p> <ul style="list-style-type: none">-An admission date of 3/4/19;	<p>you will see that the facility does not kick clients out because of 3 negative urines. If you look at all the client's urine, you will see some have months of positive and some have weeks of clean maybe a few with months clean. This statement is false regarding the licensee facility. Licensee can only speak on the facility. In addition, if a client is not showing any progress with the same level of use in 60 days, they are being evaluated for their level of readiness to work their recovery or for a higher level of care. When a client is doing well, then they are processed to stepped down as clinically necessary</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>-Diagnoses of Severe Alcohol Use Disorder, Severe Cocaine Use, and Bipolar Disorder;</p> <p>-An assessment dated 3/4/19 noting "homeless, receives Medicaid and SSI, current alcohol and drug use (crack cocaine), uses alcohol daily and crack cocaine 3 times a week and is currently residing in an apartment with transitional housing."</p> <p>-A treatment plan dated 3/5/19 noting "will develop five strategies to decrease urge to use substances, negative urine screens, self and staff report, will develop new effective problems strategies to manage his mood and submit to urine drug screens, will manage day to day stress, will have a relapse prevention plan and will identify and challenge his thinking and behaviors."</p> <p>Interview on 8/5/19 with client #5 revealed:</p> <p>-He attended the SACOT program and received housing through the transitional housing program;</p> <p>-He paid \$200 monthly for rent to the THC;</p> <p>-"They've (substance abuse program staff) said they (substance abuse facility and transitional housing program) are separate ...[the THC] says they are together;"</p> <p>-He thought the transitional housing program subleased 12 apartments in the complex in which he lived.</p>	<p>Licensee disagrees with this statement</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>Review on 8/8/19 of client #6's record revealed: -An admission date of 7/10/19;</p> <p>-Diagnoses of Cannabis Use Disorder, Moderate Stimulant (Cocaine) Use Disorder and Bipolar Disorder, Moderate, Current Episode.</p> <p>-An assessment dated 7/10/19 noting "has Medicaid and is homeless, has a mental illness, history of alcohol use, history of Cocaine Use (3 time weekly) and Marijuana use (daily), has history of suicidal ideation and making threats, has fleeting ideas and a history of self-injurious behaviors which is low to moderate risk;"</p> <p>-A treatment plan dated 7/26/19 noting "will abstain and maintain total abstinence while gaining knowledge and understanding the disease, learn and implement alternative coping and relapse prevention skills, will learn and implement anger management skills to reduce her level of stress."</p> <p>Interview on 8/5/19 with client #6 revealed:</p> <p>-She attended the SAIOP program and received housing through the transitional housing program;</p> <p>-She had been informed by the THC that the substance abuse program paid for her housing;</p> <p>-The Corporate Compliance Officer (CCO) of the substance abuse program was also the Director of the</p>	<p>Licensee Disagree with the statement. The facility does not pay for their housing nor does Medicaid pay for housing. If that was true, there are multiple clients living in housing without Medicaid and attend the licensed facility.</p> <p>Licensee is not involved with rules of THC nor does clients get put out of treatment for 3 unexcused absences. If a client is out, the clinician is supposed to call and ensure they are ok since they are in treatment and just let them know they was concerned. This is also a best practice that is used to help keep client focus especially for those without support systems. There are plenty of clients if not all that has missed well over 3 days and still attend the treatment</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>transitional housing program;</p> <p>-"We are told (by the THC) we have to leave our apartment from 9:00am - 1:00pm and attend substance abuse classes;"</p> <p>-"If you have 3 unexcused absences, they will put you out of the program (substance abuse) and you will get evicted from your apartment ...that is what [the CCO] told us."</p>	<p>facility. Licensee does not get involved with the policy of THC. Each client is encouraged to attend the program to work their recovery as it is important for their life. There is a high level of overdose and to make sure the client works toward their recovery; we encourage them to meet all recommended treatment sessions. As we would do with private pay, or any insurance panel. In addition, there are some clients who are mandated by court or their PO to attend and not miss any sessions who live in THC.</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>Review on 8/8/19 of client #7's record revealed:</p> <ul style="list-style-type: none">-An admission date of 6/11/19;-Diagnoses of Severe Alcohol Use disorder, and Mild Marijuana Use Disorder, in Full Remission;-An assessment dated 6/15/19 noting "is homeless, has current legal issues, history of marijuana and cocaine use (daily), is addicted to drugs and alcohol and ready for treatment;" -A treatment plan dated 7/8/19 noting "will identify and work towards needed changes to the different areas of her life, will learn and implement personal coping strategies to manage stress, relapse triggers and will improve quality of life through maintaining abstinence while developing and working towards goals." <p>Interview on 8/5/19 with client #7 revealed:</p> <ul style="list-style-type: none">-She attended the SAIOP program and received housing through the transitional housing program;-The THC had informed her on 8/1/19 that the CCO of the substance abuse program was also the Director of the transitional housing program, and he paid the bills for the transitional housing program;	<p>CEO/Licensee disagree with this statement. CEO never spoke with #7 or any clients about being on any best behavior and I asked the other Staff (with my same name) to handle the traffic to DHSR. No one told a client that they will be kicked out that is a client trying to manipulate to gain perks from DHSR</p> <p>Staff Regina Allen mentioned to her group who #7 attends to be on</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>- "I was told by [the CEO/L] I best be on my best behavior or [the CCO] is going to kick us out (of the apartments and the substance abuse program);"</p> <p>- "This is crazy ...people out here is scared to talk."</p> <p>Review on 8/8/19 of client #9's record revealed:</p> <p>- An admission date of 6/4/18;</p> <p>- Diagnoses of Severe Alcohol Use Disorder, Severe Cocaine Use Disorder, and Schizoaffective Disorder, Depressive Type;</p> <p>- An assessment dated 6/4/18 noting "has legal involvement, incarcerated for assault and is currently on probation, uses as much alcohol as I can, uses crack cocaine daily (all day every day) and stated his life is out of control;"</p> <p>- A treatment plan dated 7/19/19 noting "Acquire and implement coping skills, relapse prevention skills, maintain long-term sobriety, develop and implement a relapse prevention plan, increase self-knowledge about her diagnoses and learn effective coping skills and will manager her substance use by self-report and participating in Out Patient Therapy."</p>	<p>their best behavior based staff K report.</p> <p>Licenses disagree with all statements</p> <p>Licensee treatment facility does not have anything to do with THC rules and have no knowledge of who pay want and for want reason.</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>Interview on 8/5/19 with client #9 revealed:</p> <ul style="list-style-type: none">-She attended the SACOT program and received housing through the transitional housing program;-The THC had required her to pay \$40 because she missed 3 days at the substance abuse treatment facility;-The THC required her to pay \$200 per month for rent. <p>Review on 8/8/19 of client #15's record revealed:</p> <ul style="list-style-type: none">-An admission date of 6/5/19;-Diagnoses of Severe Alcohol Use Disorder, Unspecified Bipolar Disorder, GAD, Gout and Hep C;-An assessment dated 6/5/19 noting "has cirrhosis of the liver, stage 5, is currently homeless, had a driving while impaired (DWI) with a blood alcohol content of .35, sexually abused by a family member, was previously in treatment at a local hospital, drank alcohol for the first time at age 12 and now uses at least a 12 pack per day, thoughts of suicide while in treatment at a rehab place, took a bunch of pills, wants counseling to assist with stability, history of cocaine and marijuana use, panic attacks a few times per week, first used alcohol and cocaine at the age of 11 or 12;"-An initial assessment dated 5/30/19 noting "had previously presented (on 5/29/19) and had been referred			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>to the hospital due to suicidal ideation and a plan, on 5/28/19 presented to the hospital for suicidal ideation and worsening depression, stated he became suicidal because he had nowhere to go. He would like resources on housing and substance abuse treatment, was hospitalized on 7/3/19 and discharged on 7/10/19, is seeking treatment for suicidal ideation, depression and alcohol use, needs medication stabilization, is unemployed, reports on-going alcohol use and recommendations of mental wellness /sobriety plan."</p> <p>-A treatment plan dated 7/11/19 noting "will attend group therapy sessions 5 out of 5 days per week to share thoughts and feelings associated with reasons, consequences of feelings about and alternatives to addiction by active participation in sessions and providing urine screens, continues to need assistance with his usage of alcohol and would benefit from a different level of care, will learn and implement personal skills to manage emotions of day to day challenges and build confidence in managing them without the use of substances, actively participate in sessions and provide drug screens, stopped taking his mental health medications, will also attend Alcoholics Anonymous and Narcotics Anonymous and other self-help/mutual support groups."</p>			
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>Interview on 8/2/19 with client #15 revealed:</p> <ul style="list-style-type: none">-He attended the SACOT program and received housing through the transitional housing program;-He attended the facility 5 days a week in order to receive housing. <p>Review on 8/7/19 of client #16's record revealed:</p> <ul style="list-style-type: none">-An admission date of 1/2/19;-Diagnoses of Severe Stimulant (Cocaine) Use Disorder, Moderate Alcohol Use Disorder, and Unspecified Housing or Economic Problems.-An assessment dated 1/2/19 noting "was evicted due to unpaid rent, conflict with friends and family, drug abuse, DWI, currently uses cocaine, alcohol, sought prior treatment, used alcohol at the age of 17 for the first time, used cocaine at the age of 25, use of cocaine was 4 times per week, is currently homeless, is addicted to drugs and alcohol and wants to improve his stability and coping skills."-A treatment plan dated 7/12/19 noting "will decrease his denial of substance abuse and achieve and maintain abstinence by substance abuse group attendance, over the next 90 days, and will identify alternative activities to engage in recreational purposes that don't consist of illicit drugs or alcohol consumption by random urine drug	<p>Licensee does not get involve with THC procedures nor does Licensee take any money from THC</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>screens."</p> <p>Interview on 8/5/19 with client #16 revealed:</p> <ul style="list-style-type: none">-He attended the SACOT program and received housing through the transitional housing program;-He paid case management fees in the amount of \$200 per month to the THC. <p>Review on 8/5/19 of client #16's receipts for case management fees and signed by the THC revealed:</p> <ul style="list-style-type: none">-Receipt number 172006 dated 3/1/19 for \$200;-Receipt number 172053 dated 5/3/19 for \$200;-Receipt number 172198 dated 5/3/19 for \$200; <p>-A handwritten receipt with no receipt number and no date for \$200.</p>			
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

Reference to the out of compliance Issue	Description of how Corrections will be made	Responsibility for Monitoring the Corrective Action	Timetable for the implementation of the corrective actions
<p>Review on 8/7/19 of client #18's record revealed:</p> <ul style="list-style-type: none"> -An admission date of 6/17/19; -Diagnoses of Alcohol Use Disorder, Cannabis Use Disorder, Cocaine Use Disorder and GAD; -An assessment dated 6/17/19 noting "receives [government insurance program], has been homeless for 3 years and needs transitional housing, current legal issues of Fraud and is currently on probation, currently abusing Marijuana and Alcohol;" -A treatment plan dated 6/17/19 noting "will work to increase her natural support network to support her long term sobriety from all mood altering substances as evidenced by active participation in sessions, engaging in positive sober activities outside of group, provide drug screens, will learn and implement alternative coping strategies to manage urges to relapse into substance use as evidenced by using at least 1 skill per week for the next 90 days, active participation in sessions, providing drug screens and self-report, will increase anxiety and frustration by reporting feeling more positive and self and 			

Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>abilities during therapy sessions."</p> <p>Interview on 8/5/19 with client #18 revealed:</p> <p>-She attended the SACOT program and received housing through the transitional housing program.</p> <p>-"They (the THC) said if we attended classes (substance abuse treatment), we could live here (transitional housing) free because we had Medicaid;"</p> <p>-When she moved into the transitional housing program, she was working full time, but the THC informed her she had to quit her job in order to remain in the housing program because her work hours didn't allow for her to attend substance abuse classes;</p> <p>-The CCO of the facility was also the Director of the transitional housing program;</p> <p>-The THC had instructed her to talk with the CCO about issues concerning the apartments;</p> <p>-"All we do is complain about the housing in our groups (substance abuse treatment) ...we talk about how stressful it is living in the housing apartments."</p>	<p>licensee didn't manage the transitional house program</p> <ul style="list-style-type: none"> • Licenses cannot speak to whether the THC program told the clients whether they need to attend • I cannot speak to what THC said • absolutely incorrect • I have no knowledge of what the THC told a client • I never heard client #18 make this state 		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>Review on 8/7/19 of FC #19's record revealed:</p> <ul style="list-style-type: none">-An admission date of 12/17/18;-Diagnoses of Dyslexia, Severe Alcohol Use Disorder, Severe Cannabis Use Disorder, Severe Cocaine Use Disorder, Severe Opioid Use Disorder, Post-Traumatic Stress Disorder, Bipolar Disorder and Major Depressive Disorder;-A discharge date of 7/3/19;-An assessment dated 12/17/18 noting "currently working on her GED (General Equivalency Diploma), has frequent and severe headaches, has a history of mental illness, is developmentally and physically disabled, needs assistance with education improvement, transportation, housing, was abused by her father and brother and needs assistance with medical care;"-A treatment plan dated 5/8/19 noting "will identify 5 strategies to eliminate the urge to use mood altering substances by a decrease in her usage, negative drug screenings, self-report and staff report over the next 90 days, will utilize behavioral and cognitive coping skills to help maintain sobriety and a life free of mood altering substances by participation in substance abuse group attendance, developing coping skills and negative urine drug screenings over the next 90 days, will identify and verbalize feelings related to current emotions and issues of her past by participating in individual therapy, medication management, self-reports and staff reports	<p>Licensee cannot speak to housing issues because that is outside of Licensee's treatment. Any person that comes to the facility for an assessment for substance abuse services must be appropriate for service. A urine test is done at the time of entrance to ensure a client is not underreporting usage. If a client is actively using but main goal was housing, that is not something that is identified in the first 30 days. The active drug use is what Licensee services. Individuals that get discharged from housing is are not automatically discharged from Treatment.</p> <p>And vice versa, individuals discharged from treatment are not automatically discharged from housing. Housing and treatment are two separate companies. Ready4Change is the treatment portion. If they are discharged from housing, to our knowledge, it is because client requested it, never returned, or wasn't appropriate for the service anymore. In this case it sounds like the client only wanted housing and did not want to work on her recovery. There are a good number of clients who is are no longer</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>over the next 90 days."</p> <p>Interview on 8/14/19 with former client #19 revealed:</p> <ul style="list-style-type: none">-She was discharged from the SAIOP program and the transitional housing program in July 2019;-The CCO informed her he was discharging her because he thought she had contacted the city and complained about the housing conditions;-The CCO had informed her ..."if I come back on the property (facility or housing) I would go to jail;"-"I wasn't there for drug issues, I was there for housing." <p>Review on 8/8/19 of FC #21's record revealed: -An admission date of 11/28/18; -Diagnoses of Severe Opioid Use Disorder, Cannabis Use Disorder, Bipolar Disorder II and Attention Deficit Hyperactivity Disorder;</p> <p>-A discharge date of 7/19/19;</p>	<p>in THC but still attend the Licensee Facility for treatment because the treatment program really helped the client gain stability when they worked the program process and their recovery plan. Housing has no bearing on treatment</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>-An assessment dated 12/6/18 noting "presented with an anxious mood, disheveled, cooperative, denied current or recent suicidal or homicide ideation, denied use of opiates during the last 7 months, has a prescription of Suboxone and her mental health symptoms have improved since a change in her medications;"</p> <p>-A treatment plan dated 6/3/19 noting "will maintain abstinence from all illicit substances, will develop and implement relapse prevention plans, will actively participate in sessions, drug screens and self-disclosure, will learn and implement coping skills, will manage stress and high risk situations for relapse, will utilize 3 new coping skills per week and will accept limitations in life and tolerate rather than avoid unpleasant emotions."</p> <p>Interview on 8/5/19 with former client #21 revealed:</p> <p>-She had previously attended the SAIOP program and received housing through the transitional housing program;</p> <p>-The CCO of the substance abuse program was also the Director of the transitional housing program.</p>	<p>#21 must be the client who worked the program and had success. Client #21 should be an example of a success not a deficiency.</p>	<p>n/a</p>	<p>N/A</p>
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>Review on 8/14/19 of FC #23's record revealed:</p> <ul style="list-style-type: none">-A second admission date of 9/18/18;-Diagnoses of Mild Alcohol Use Disorder, Mild Cannabis Use Disorder, Moderate Cocaine Use Disorder and Major Depressive Disorder;-A discharge date of 9/18/18;-An assessment dated 9/17/18 noting "has Medicaid, has been homeless for 4 years, domestic violence and conflict with family or friends, has anxiety and depression, no legal issues, first use of alcohol and cocaine at age 16 and does not need assistance with ADL's;"-A treatment plan dated 9/18/18 noting "will identify 3 triggers that contribute to her substance use and share weekly in group by self-disclosure and group participation over the next 90 days, will assess for safety concerns and the impulse to contact and retaliate against her husband twice a week for the next 90 days, will incorporate 3 healthy coping skills weekly to abstain from substance use as evidenced by self-report and participation in substance abuse group weekly for the next 90 days;"-Urine drug screens collected on 2/19/18, 2/23/18, 9/18/18, and 9/21/18 were all negative for illicit substances and alcohol. <p>Interview on 8/14/19 with FC #23 revealed:</p>	<p>Licensee disagrees with these findings as adverse to the treatment issue. Licensee is not aware of any client including #23 coming into the program that didn't need substance abuse help. That would also be evident through drug screenings, which demonstrate that client #23 was not using drugs.</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>-She had previously attended the SACOT program and received housing through the transitional housing program;</p> <p>-"I let [the THC] know when I moved in that I didn't have a drug issue, but she told me I had to go to the class (substance abuse treatment);"</p> <p>-She was not given a choice in which substance abuse facility to attend.</p> <p>Review on 8/12/19 of FC #25's record revealed:</p> <p>-An admission date of 6/20/19;</p> <p>-Diagnoses of Severe Cannabis Use Disorder, GAD, Mild Cocaine Use Disorder and PTSD;</p> <p>-A discharge date of 7/13/19;</p> <p>-An assessment dated 6/20/19 noting "has Medicaid, receives SSI of \$694 per month, has a brain injury and is currently pregnant, history of mental illness, drug abuse and is legally blind in her left eye, needs assistance with ADLs, transportation, housing and money management."</p> <p>-A treatment plan dated 6/20/19 noting "will receive assistance with her recovery efforts by seeking substance abuse counseling and other rehabilitative services to</p>			
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

reduce her chances of relapse, by attending and fully participating in SAIOP program 5 days each week for 4 hours each day, as well as having negative random drug screenings, will work to develop effective coping strategies and start working with the 12-steps to help with low-risk choices 5 out of 7 days a week evident by observation of behavior, drug screenings and self-report, will resolve trauma by the ability to use self-expression to communicate about events, thoughts and feelings associated with trauma history, without subsequent substance use, by therapist's observations and self-report."

Interview on 8/13/19 with FC #25 revealed:

- She had previously attended the SACOT program and received housing through the transitional housing program;
- The CCO of the substance abuse treatment program is also the Director of the transitional housing program;
- "I can actually say my addiction got worse when I came up here (to the transitional housing program);"
- "I mean my roommates did cocaine and drank ...the dude right across the hallway from us would sit outside and smoke crack;"
- She felt that a lot of people attended the facility in order to get housing.

Licensee cannot control if clients use in the community. Every client has the right to live where they want as well as attend any service they chose. There were other clients who was at THC and attended ADS for groups and didn't want to come to treatment at R4C

Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>Interviews on 8/2/19, 8/5/19, 8/7/19, 8/13/19 and 8/14/19 with clients #1, #3, #5, #6, #7, #9, #15, #16, and #18 and former clients (FC) #19, #21, #23, and #25 regarding the condition of the apartments that were being provided through the transitional housing program revealed:</p> <p>The apartments subleased by the transitional housing program were overcrowded;</p> <ul style="list-style-type: none">-They were infested with bedbugs and roaches;-The water and power were frequently disconnected;-The air conditioning was not working in some apartments; <p>-Males and females that were unfamiliar with each other were placed in the same apartment with no locks on their bedroom doors;</p> <ul style="list-style-type: none">-Clients were not provided with keys to lock their apartment doors which resulted in belongings being stolen; <p>-Doors were required to be locked from the inside at curfew (10:00pm on weekdays and 11:00pm on weekends) and no one was allowed to go in or out of the apartments after curfew; -Clients were being informed they had to immediately leave housing and substance abuse treatment and not return if they complained about the housing conditions.</p>	<p>licensee cannot speak to concern at housing. licensee is a treatment facility and does not operate in the housing arena</p> <p>licensee cannot speak to concern at housing. licensee is a treatment facility and does not operate in the housing arena</p> <p>licensee cannot speak to concern at housing. licensee is a treatment facility and does not operate in the housing arena</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>Interview on 8/13/19 with Former Staff (FS) #3 revealed:</p> <ul style="list-style-type: none"> -She felt that the clients were attending the substance abuse facility in order to receive housing; - "The people didn't want to be there (substance abuse treatment) ...they were there for housing;" -The CCO of the SACOT and SAIOP programs was also the Director of the transitional housing program; -The CCO informed staff during a meeting (date unknown) that the facility and the transitional housing program were separate, but he was always at the apartments; - "My understanding was they (the Licensee and the CCO) had it (transitional housing) under another name because the program (substance abuse) can't run housing;" - "They (the clients) felt like they couldn't go get a job because they had to attend group and had a curfew;" - "They (the clients) caught word if you got clean, you would lose your housing." 	<p>Licensee cannot speak to the opinion of a Staff#3 and why they felt why the clients was attending the classes</p> <p>Licensee cannot speak to who is the housing overseer</p> <p>Licensee cannot speak to the opinion of a staff#3</p> <p>Licensee cannot speak to the opinion of a Staff #3</p> <p>Licensee cannot speak to the opinion of Staff #3</p>	<p>licensee cannot conduct a POC on other opinion aout housing</p> <p>licensee cannot conduct a POC on other opinion aout housing</p> <p>licensee cannot conduct a POC on other opinion aout housing</p> <p>licensee cannot conduct a POC on other opinion aout housing</p> <p>licensee cannot conduct a POC on other opinion aout housing</p>	<p>licensee cannot speak to concern at housing. licensee is a treatment facility and does not operate in the housing arena</p>
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>Interview on 8/9/19 with FS #4 revealed:</p> <ul style="list-style-type: none">-The clients were recently (date unknown) asked to sign a document that said they understood the facility and the transitional housing program were separate;-"Anytime there's an issue with housing, [the CCO] is the first to be called and he's always out there ...nights and weekends, he's always out there."	<p>Licensee cannot speak to the opinion of Staff#4</p>	<p>licensee cannot conduct a POC on other opinion about housing</p>	
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
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Intent to Revoke License MHL#041-1069

<p>Interview on 8/12/19 with the former Licensed Professional Counselor Associate (LPCA) #2 revealed:</p> <ul style="list-style-type: none"> -The main concern the clients at the facility expressed to her during therapy was their living situation; -"Some of them would even express that even though they had substance abuse issues, they were still human beings;" -The CCO of the substance abuse facility was also the Director of the transitional housing program; -The clients were instructed by the THC to discuss their housing issues at the substance abuse facility with the CCO -The Licensee had informed the staff and clients that the substance abuse treatment facility and the transitional housing program were separate; -She didn't understand why if the 2 programs were separate that so much time at the facility was spent discussing the transitional housing program; 	<p>licensee cannot speak to the opinion of staff #2</p> <p>licensee cannot speak to the opinion of staff #2</p> <p>licensee cannot speak to the opinion of staff #2</p> <p>Correct the treatment facility is separate from the housing</p> <p>licensee cannot speak to the opinion of staff #2</p>	<p>licensee cannot conduct a POC on other opinion about housing</p> <p>licensee cannot conduct a POC on other opinion about housing</p> <p>licensee cannot conduct a POC on other opinion about housing</p>	
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>-She had worked at the facility for approximately 3 months and during that time, all the referrals she had received were from the THC except for 2-3;</p> <p>-She was aware of 1 client that had abused substances and attended classes at the facility in order to receive housing;</p> <p>-"A lot of them (clients) were concerned about how am I supposed to get better when I go back to my apartment (transitional housing) and everyone is using."</p> <p style="text-align: center;">Interview on 8/9/19 with staff #2 revealed:</p> <p>-The transitional housing program was a nonprofit program that the CCO oversaw;</p> <p>-She felt like the Licensee and the CCO had taken advantage of the clients at the facility by offering substandard housing to entice them to attend the facility programs;</p> <p>-"When they (the clients) find somebody to take advantage of them it's so sad."</p>	<p>licensee cannot speak to the opinion of staff #2</p> <p>licensee cannot speak to the opinion of staff #2</p> <p>licensee cannot speak to the opinion of staff #2</p> <p>licensee cannot speak to the opinion of staff #2</p> <p>licensee cannot speak to the opinion of staff #2</p> <p>licensee cannot speak to the opinion of staff #2</p>	<p>licensee cannot conduct a POC on other opinion about housing</p> <p>licensee cannot conduct a POC on other opinion about housing</p> <p>licensee cannot conduct a POC on other opinion about housing</p>	
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>Interview on 8/6/19 with staff #6 revealed she had heard complaints from the clients regarding the transitional housing program of "roaches ...bed bugs ...if you don't come to the program (substance abuse treatment), you will be kicked out of the housing."</p> <p>Interview on 8/8/19 with the LPCA #1 revealed:</p> <p>- "Housing (transitional housing program), it's a mess;"</p> <p>- She had made the decision to not refer homeless clients to the transitional housing program and instead referred them to other programs;</p> <p>- "I don't think that many people with the same issues need to be living together ...those with issues (substance abuse) do not need to live together without more structure;"</p> <p>- "Housing is the start of every session ...they (the clients) say there's too many people (in each apartment), they say they are going to be kicked out (with no notice), bed bugs, roaches, complaints of not having keys to their apartments, and water and power turned off;" -She had addressed the numerous complaints regarding housing with the Licensee and the CCO and they informed her they would handle the housing issues.</p>	<p>licensee cannot speak to the opinion of staff #1</p> <p>licensee cannot speak to the opinion of staff #1</p> <p>licensee cannot speak to the opinion of staff #1</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>Interview on 8/8/19 with the Licensed Clinical Addiction Specialist #1 revealed:</p> <ul style="list-style-type: none"> - "I try to tell them (the clients) I am not over housing (transitional housing program) or affiliated with housing;" - Issues that had been expressed to her by clients during therapy included "bed bugs, roaches, too many people in 1 apartment, some are worried about missing curfew and not being able to get back into the apartment, active using in apartments, issues with stealing, a lot of it is drama with the other people (clients);" - The clients in the transitional housing program were required to attend a substance abuse treatment program; - The CCO of the substance abuse treatment facility was also the Director of the transitional housing program; - The CCO tracked the attendance of the clients in the transitional housing program because he provided most of the transportation between the housing program and the facility; - "Sometimes they (the clients) ramp up their use (prior to urine drug screens); - She felt that some clients attended the program at the facility only to remain in housing; 	<p>Therapy is the appropriate place for these concern to be address with client</p> <p>licensee cannot speak to the opinion of staff #1</p> <p>licensee cannot speak to the opinion of staff #2</p> <p>licensee is not aware of anyone ramping up drugs use. However, this #1 should have reported this and address this during clinical staffing to be address.</p> <p>Licensee disagrees with these</p>	<p>A training wil be done to ensure all staff understand hw t report these type f allegation bout client using to get into the facility</p>	
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
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<p>-The clients she provided therapy to that received income had informed her they were required to pay rent in order to remain in the transitional housing program;</p> <p>-"It feels like the clients are exploited at times when it comes to the housing and getting paid;" -The THC referred all the clients in the transitional housing program that were receiving a government insurance plan to the facility.</p> <p>Observation on 8/7/19 of the THC's office at the transitional housing program revealed a sign "Class is mandatory Monday-Friday 9:00am 1:00pm."</p>	<p>allegations. Licensee cannot be aware of any overcrowding problems and does not regulate THC.</p> <p>Licensee contacted the City Code Enforcement to go and inspect the concerns of bedbugs because [REDACTED] [REDACTED] complained and Licensee (CEO) and [REDACTED] contacted the city to come out to make the owners of the Apartment Complex to fix the bug problem. However, the owners of the Apartment Complex could not be reached.</p> <p>Licensee (R4C) does not pay bills so this would not be a findings. Licensee disagrees with findings</p> <p>1. Licensee (R4C) disagrees with the findings directed toward R4C.</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

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Intent to Revoke License MHL#041-1069**

<p>Interview on 8/7/19 with the THC revealed:</p> <ul style="list-style-type: none">-The transitional housing program subleased 11 apartments;-In order to remain in housing, clients were required to attend a substance abuse program;-The case management fees that she received from the clients were provided to the substance abuse program that the client attended. <p>Interviews on 8/7/19 and 8/8/19 with a representative from the City Code Inspector's Office revealed:</p> <ul style="list-style-type: none">-The CCO of the substance abuse facility was also the Director of the transitional housing program;-The apartments where the clients resided were subleased by the transitional housing program;-He was aware of at least 9 apartments that were being subleased in the same apartment complex. <p>Interview on 8/12/19 with the Leasing Manager revealed:</p>	<p>Licensesse cannot speak to the conditions of the apt inclidung whether over crowesd , water, disconnect</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>-The transitional housing program originally subleased 14 apartments but were now subleasing 12 apartments;</p> <p>-The property owner wasn't going to renew the leases due to the substandard conditions of the apartments;</p> <p>-The CCO paid the monthly rent for clients in the SAIOP and SACOT programs with money orders at the request of the property owner due to the rent being paid late continuously.</p> <p>Review on 8/12/19 of an email dated 8/6/19 from the apartment leasing manager to the CCO revealed:</p> <p>-13 of the 14 apartments had accrued late fees do to unpaid rent.</p> <p>-The total balance of \$10, 818.80 included rent and late fees.</p> <p>-In order to avoid filing of eviction, all the monies must be received by the close of business on 8/14/19.</p> <p>Review on 8/12/19 of cashier's checks and receipts from the CCO to the apartment complex revealed:</p> <p>-Cashier's check dated 2/27/19 for the amount of \$11,621.20.</p> <p>-Cashier's check dated 4/22/19 for the amount of</p>	<p style="color: red;">Absoultey untrue</p> <p>Licensie does not have any no knowledge of CCO would have informed staff about the relationship between facility and housing</p> <p style="color: red;">Licensie cannot speake to the allegation of icenase and CCO Non relationship or relationship between the two</p> <p style="color: red;">No knowledge of what the FS though about what the clent start</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
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Intent to Revoke License MHL#041-1069

<p style="text-align: center;">\$10,993.50.</p> <p>-Cashier's check dated 5/14/19 for the amount of \$10,993.50.</p> <p>-Cashier's check and receipt dated 6/17/19 for the amount of \$10,993.50.</p> <p>-Cashier's check dated 7/12/19 for the amount of \$7,500.00.</p> <p>-Cashier's check dated 7/22/19 for the amount of \$3,493.50.</p> <p>Review on 8/7/19 of the CCO's social media revealed work experience of "Executive" of the substance abuse facility and "Director" of the transitional housing program.</p>	<p>No knoweged of this allegation Licenseed denies any collation between the housing and fciiity wouldi like to state and the facitty nd the housing had no collation</p> <p>FC#4</p> <p>L agrees that both are sepearted</p> <p>FS4# L cannot speake to a staff opinion</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

<p>Review on 8/7/19 of the non-profit information for the transitional housing program revealed the CCO was listed as "In Care of Name;"</p> <p>Interview on 8/9/19 with the CCO revealed: -He wasn't sure why he was being asked questions regarding the transitional housing program;</p> <p>- "I help with housing from my passion but [the THC] handles housing (transitional housing program);"</p> <p>-He was aware that there were concerns regarding the transitional housing program and felt that it was chaotic;</p> <p>- "The clients want to do what they want to do;"</p> <p>-He was not aware that clients in the transitional housing program were paying case management fees;</p> <p>- "A while back we talked about that (case management fees) ...not aware that was still happening;"</p> <p>- "I'm sure she (the THC) uses that money to help them (the clients)."</p> <p>Interview on 8/15/19 with the Licensee revealed:</p> <p>-The substance abuse treatment facility and the transitional housing program were separate;</p> <p>- "We don't do housing ...I am confused ...break it down so I understand;"</p>	<p>LFS#2icesess agrees that the therapy session should work with the client with their living situation even if housig and fai=uty have ntheing t do wih eachother</p> <p>Untrue statement CCO</p> <p>Cannot speak to whaat was discuss with THC and client</p> <p>Licensee agrees the facuiikty and housing are sepeated</p>		
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**PLAN OF CORRECTION (POC)
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Intent to Revoke License MHL#041-1069**

<p>- "The common denominator is [the CCO];"</p> <p>- "He (the CCO has to draw the line;"</p> <p>- She had informed the CCO numerous times to stop addressing housing issues while at the substance abuse facility.</p>	<p>Speak to her opinion if she didn't understand however, as a therapist you speak with the client about what ever they are going through</p> <p>Licensee is not aware that this happened. If #2 had this knowledge then it should have been reported.</p> <p>Licensee have no control over community activities</p> <p>Untrue statement</p> <p>Licensee does not offer housing</p>		
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**Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407**

**PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069**

<p>This facility was licensed to provide three services: Substance Abuse Intensive Outpatient Program, Substance Abuse Comprehensive Outpatient Treatment and Psychosocial Rehabilitation.</p> <p>Current and former clients audited had diagnoses of Hepatitis C, illicit substance use (Marijuana, Cocaine, Methamphetamine, Opiates), alcohol use, and mental health diagnoses.</p> <p>The CCO of the substance abuse treatment facility was also the Director of a transitional housing program.</p> <p>The clients were provided transitional housing services contingent on their substance abuse treatment.</p> <p>If they had 3 unexcused absences from the substance abuse program, they were charged a case management fee depending on the amount of income they recieved or were kicked out of their apartment and the substance abuse program.</p> <p>All fees were paid to the THC and then were given to the substance abuse program.</p> <p>Although treatment needs were identified for clients, treatment and groups often centered around the substandard housing.</p>			
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**PLAN OF CORRECTION (POC)
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<p>The Licensee was aware of the transitional housing but maintained that it was separate from the treatment program.</p> <p>Client and staff interviews however, supported that she had knowledge of the housing being contingent upon attending treatment.</p> <p>This deficiency constitutes a Type A1 rule violation for serious exploitation. An administrative penalty of \$6,000.00 is impose-</p>	<p>Licensee disagree with this statement</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
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	<p>License is not aware this took place and the Staff should have address</p> <p>I cannot speak to this</p> <p>I cannot speak to the wha is posted</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

	<p>License have nothing ti d with hosing</p> <p>Its best to ask the THC board these questions of why (if any) do they charge and what is the program</p> <p>Licensee disagree with findings based toward R4C</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

	<p>Licensee has never taking any money from THC . Disagree with this statement</p> <p>Nothing to do with Licensee and the treatment facility</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

	<p>License does not pay bills and not involved with financial with THC</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

	<p>Licensee disagree with the findings and statements.</p> <p>Licensee words are being merge into three separate conversations</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

	<p>Not true</p> <p>Licensee disagree with Findings and penalty</p> <p>I cannot spea to the contigngetn of huosugn</p> <p>Cannot spea to housing fees</p>		
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Ready 4 Change Inc
5 Centerview Dr, Greensboro NC 27407

PLAN OF CORRECTION (POC)
FOR
Intent to Revoke License MHL#041-1069

	<p>Absolutely untrue</p> <p>License is not aware of contingency based on housing</p> <p>Licesne disagree with the fine</p>		
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**EMPLOYEE HEALTH AND SAFETY
POLICY REVIEW ACKNOWLEDGMENT**

Our organization is committed to maintaining a healthy, safe, and clean environment that supports quality services and minimizes risk of harm to persons served, personnel, and other stakeholders.

To ensure that our personnel are aware of all policies pertaining to Health and Safety, the following policies are reviewed with all staff within their first 90 days of employment.

- Bomb Threats
- Evacuation and Fire
- Health and Safety Organizational Responsibility
- Infection Control
- Medical Emergencies
- Power Failure
- Risk Reduction and Incident Reporting
- Safety Drills and Procedures
- Self-Inspections
- Tobacco Products
- Transportation
- Weapons
- Weather and Natural Disasters
- Workplace Violence

Please see a member of the Health and Safety committee or a location Manager should you have any questions or need additional information regarding these policies.

The policies listed above have been reviewed with me, and I understand them fully. By signing below I attest to the fact that the policies have been reviewed with me, and I know where to access the policies and who to contact should I have any questions or problems in the future.

[Handwritten Signature]
Employee's Signature

6/29/17
Date

[Handwritten Signature]
Supervisor's Signature

3-29-
Date

RECEIVED

By DHRS-Mental Health Licensure at 8:19 am, Sep 16, 2019



Security of Confidential Information

Purpose: To ensure the confidentiality of client information

Policy: "Ready 4 Change" policy requires that all client records be kept in a central office area with locked files, allowing only authorized staff to access their files. All client records should be kept in a locked area when not in use by "Ready 4 Change".

Original records shall not be removed from the premises except on a court order or subpoena to produce documents. Records may be transported for treatment or audit purposes. When it is necessary to transport records by motor vehicle, the records must be secured in a locked compartment.

For records contained in the computer system, restricted access to the program/system will protect the confidentiality of client information. Client records/information contained on disk/flash will be kept in a locked area when not in use. The computer system must be located in a controlled office area. Only persons with authorized access to client's records will utilize this computer system.

Ready 4 Change expect all staff, contractors, volunteers, and employees to maintain confidentiality while doing business at Ready 4 Change. It is important that you respect the privacy of all consumers and members. Staff will not share information with another agency or person without the consent of the member (client). Staff will not share information with a member regarding another member. If this rule is violated, immediate termination may take place. Confidentiality is important at all times.

M. Nantz, PhD, LP 6/29/17
Staff Signature Date

M. Lane 6/29/17
Administrative Date

protected, sets limits on how that information may be used or shared, and provides patients with certain rights regarding their information. Ready 4 Change has its own policies that reflect these regulations as well as best ethical standards.

These rules protect information that is collected or maintained, (verbally, in paper, or electronic format) that can be linked back to an individual patient and is related to his or her health, the provision of health care services, or the payment for health care services. This includes, but is not limited to, clinical information, billing and financial information, and demographic/scheduling information. **Even the fact that an individual has received care at Ready for Change is protected by Ready 4 Change policy and federal regulations.**

Ready 4 Change policy and HIPAA regulations limit the use or sharing of protected patient information to the following purposes: providing treatment, obtaining payment for services, certain health care administrative functions and when required or permitted by law. Any other use or disclosure of protected information requires written authorization from the patient. For all uses or disclosures other than treatment, only the minimum amount of information necessary will be shared on a need to basis. The Notice of Privacy Practices describes to patients how we may use or disclose their health information and patient rights regarding their protected health information.

CONFIDENTIALITY AGREEMENT FOR VISITORS IN CLINICAL AREAS

As a visitor at Ready 4 Change you are required to conduct yourself in strict conformance to all applicable laws and Ready 4 Change policies governing confidential information. **Simply by being in the Ready 4 Change Center, you may encounter confidential patient information.** Care is often coordinated in semi-public environments where there is the risk that patient information may be heard or viewed by individuals not directly involved in the patient's care. Ready 4 Change has policies intended to limit the risks of such incidental disclosures of patient information.

You may see or hear information related to Ready 4 Change patients (such as charts and other paper and electronic records, demographic information, conversations, admission/discharge dates, names of attending physicians, patient financial information, etc.). **Any patient information you see or hear, either incidentally or by attending various meetings, must be kept confidential. Who you see here and what is said here let stay here when you leave here. By signing below, you are agreeing to abide by Ready 4 Change policies regarding confidentiality of patient health information.**

As a condition of and in consideration of, my use, access, and/or disclosure of confidential information, I,

DR. Mary Nemati, PhD., understand and agree to the following:

- I will access, use, and disclose confidential information only as permitted by Ready 4 Change hosts. This means that I will only access, use, and disclose confidential information that I have been given authorization to access, use, and disclose base on ethically rights, legal rights, and policy. However, an Ethical right oversees all other rights when disclosing information about a client.
- I understand that any fraudulent application, violation of confidentiality or any violation of the above provisions will result in the termination of my privilege to observe and participate in clinical areas and I may be subject to legal liability as well.
- My signature below indicates that I have read, accept, and agree to abide by all of the terms and conditions of this Agreement and agree to be bound by it.

Signature: _____

M Nemati, PhD, LP

Date: _____

05/01/17

OVERVIEW OF PRIVACY POLICIES/Confidentiality an NON-Disclosure Agreement

Ready 4 Change policy and federal regulations protect the privacy of our patients' health information. The Health Insurance Portability and Accountability Act (HIPAA) is a set of federal rules that defines what information is

Assurance of Confidentiality

The following form should be signed prior to active employment, volunteering and; or consulting, and then annually thereafter.

I, DR. Mary Nemeth (print name), an employee, volunteer or consultant for Ready 4 Change Inc, being well informed and trained regarding all policies and procedures on confidentiality rights of the consumer understand that in the course of my involvement with your agency/firm, etc, I will have access to confidential information. I agree to hold such information confidential, not sharing with anyone outside of your organization without prior authorization to do so. I also understand that if I do improperly release or disclose confidential information, I will be subject to disciplinary action, as well as well as civil penalties as allowable by the law in accordance with G.S. 122C-52 (c). Anyone discussing confidentiality regulations may result in disciplinary action or immediate termination.

Signature M Nemeth, PhD, LP

Title Licensed Psychology

Date Signed 05/01/17

I have been informed of any updates, and continue to agree to the above statement (on going)

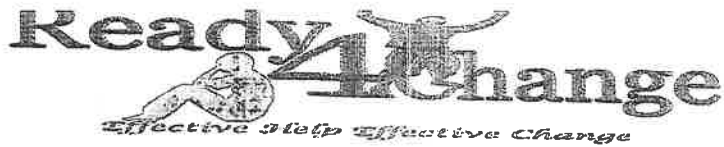
Signature M Nemeth, PhD, LP

Title Licensed Psychologist

Date Signed M Nemeth, PhD, LP

I have been informed of any updates, and continue to agree to the above statement

Signature M Nemeth, PhD, LP



Client Rights Notification for Staff

The following form should be signed prior to active employment, volunteering and; or consulting, and then annually thereafter.

I, Mary Nacati (print name), an employee, volunteer or consultant for Ready 4 Change Inc, being well informed and trained regarding all policies and procedures on Client rights of consumers.

I understand that in the course of my employment, I am obligated to protect all consumers from harm, abuse, neglect and exploitation. I agree to not subject consumers to ANY sort of neglect or indignity. I agree to not inflict abuse upon any consumer.

I agree to not sell goods or services to any consumer. I agree I may purchase goods or series from a consumer if it is for fundraising purpose only. I agree that I will not allow a client in my vehicle without insuring they are free of harm or danger to me and others. I will not use a client full name when discussing their treatment with any party involve in their treatment. All clients have the right to privacy. I will not discuss any client that receives Treatment with Ready 4 Change to outside agency without the sign permission of the client.

I further understand that if I violate any rights of the consumer, or any of the above statements, I will be subject to immediate termination. If abuse of neglect is suspected, it will be reported to the Department o Social Services.

X Signature Mary Nacati, PhD, LP

Title _____

Date Signed 05/01/17

I have been informed of any updates, and continue to agree to the above statement

Signature _____

Title _____

Date Signed _____