



**Leadership  
Policy and Procedure Manual**

**Revised: 09/10/2024**

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD 01.01.01 AND 01.03.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Leadership Structure</b>

## PURPOSE

The purpose of this policy is to define the relationship between governance and organizational management.

## RESPONSIBILITY

It is the responsibility of the Founder and/or designee to implement this policy and procedure. It is the responsibility of the Founder to disseminate this information to employees under his/her direction.

## POLICY

1. It is the policy of Jones Wellness Center to establish a leadership structure.
  - a. The leadership structure identifies those responsible for governance.
  - b. The leadership structure identifies those responsible for planning, management and operational activities.
  - c. The Leadership structure identifies those responsible for the provision of care, treatment and services.
2. It is the policy of Jones Wellness Center to be incorporated in the state in which it is located and functions as a for-profit corporation.
  - a. The Founder assumes ultimate authority and responsibility for all Jones Wellness Center's programs and functions.
3. The Founder has appointed a Leadership Team which is responsible for the day-to-day operations and clinical services.
4. It is the policy of Jones Wellness Center to identify the leadership of the organization through an organizational chart.

## PROCEDURE

1. Organizational Chart:
  - a. It is the responsibility of the Founder to ensure Jones Wellness Center's organizational chart is up to date and accurate at all times.
  - b. The organizational chart is updated at any time a significant addition or deletion of key positions occurs.
    - i. Administrative
    - ii. Medical
    - iii. Finance
    - iv. Operational
    - v. Clinical
  - c. Jones Wellness Center's organizational chart and employee job descriptions include information as to the lines of authority within the organization.
  - d. The Founder has the sole authority to approve all revisions of the organizational chart.
  - e. The organizational chart is posted in a common area for all facilities.
2. Governing Body/Leadership Committee functions include:
  - a. Reviewing annually, or more frequently as events require:
    - i. Policies and Procedures
    - ii. Performance Improvement Activities
    - iii. Management of Information Functions
    - iv. Safety and Infection Control
    - v. Job Qualifications per Positions
    - vi. Monitoring and Evaluation Data
    - vii. Annual Reports
    - viii. Written Plan for Services
  - b. Providing clinical leadership activities, policies, procedures, clinical process, recommendations, including

- privileging, and utilization review activities.
- c. Providing fiscal oversight and responsibility, including developing an annual budget.
- d. Assuring that the organization's resources are insured and that adequate resources are allocated to provide appropriate and effective services.
- e. Participating in any regulatory or accreditation reviews, including local, state, and federal reviews as required.
- f. Allocating resources for performance improvement activities.
- g. The Founder shall receive performance improvement training annually.

3. The Founder shall appoint a Leadership Committee who is scheduled to meet a minimum of annually. Among the primary roles of the Leadership Committee shall be to:

- a. Review the effectiveness and efficiency of all organizational functions.
- b. Ensure that optimal treatment and support processes are occurring.
- c. Identify organizational systemic processes that might benefit from revisions in order to improve organizational performance.
- d. Implement improvement measures and evaluate their effectiveness.
- e. Also, to be continuously involved in day-to-day systemic monitoring, evaluation, and improvement activities.

4. The Leadership Committee has taken steps to ensure that no one member of the team shall have the right or power to dictate or overrule a decision voted on by the Team.

- a. The Founder has appointed an individual with medical expertise to the Leadership Committee to add medical expertise to the board's decision-making process involving medical policies and procedures;

5. Each member shall have one vote whereas any decisions made by the team will be by majority vote.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD 01.03.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Responsibilities for Safety and Quality</b>

## **PURPOSE**

The purpose of this policy is to define the responsibilities for safety and quality of care, treatment and/or services.

## **RESPONSIBILITY**

It is the responsibility of the Founder and/or designee to implement this policy and procedure. It is the responsibility of the Founder to disseminate this information to employees under his/her direction.

## **POLICY**

It is the policy of Jones Wellness Center to provide services in accordance with state laws and regulations for the following services:

### **1. Required Hours of Service:**

- a. Individuals will receive at least 3 hours of group counseling per day and a minimum of 1 individual session with a primary Licensed Psychotherapist weekly.

### **2. Psychiatric and Medical Services:**

- a. Jones Wellness Center will maintain formal agreement with highly qualified psychiatrists and medical physicians who are well respected in the field of addiction.
- b. Jones Wellness Center will accommodate the needs of each client on a case-by-case basis.

### **3. Licensed Psychotherapist Caseload:**

- a. Jones Wellness Center's primary Licensed Psychotherapists are professional staff who hold advanced degrees and licensure in the field of mental health.
- b. To ensure individual needs are met, Licensed Psychotherapists are never to have more than 30 to 40 individuals on their caseload.

### **4. Hours of Operation:**

- a. Jones Wellness Center's hours are Monday- Thursday 9:00-7:00 pm., Friday 9:00 -5:00 p.m.

<https://joneswellnesscenter.com/>

## **INTENSIVE OUTPATIENT SERVICES**

1. It is the policy of Jones Wellness Center to provide intensive outpatient services in compliance with state statutes and administrative code. Jones Wellness Center will offer a structured therapeutic program consisting of a minimum of 9 hours per week consisting of individual, group and family therapy and based on the client's assessed need may include the following:
  - a. Substance abuse education;
  - b. Life skills training, such as anger management, communication skills, employability skills, problem solving, relapse prevention, recovery training, decision making, relationship skills and symptom management;
  - c. Training or advising on health and medical issues;
  - d. Employment or educational support services to assist clients in becoming financially independent;
  - e. Mental health services for the purpose of managing stable mental health disorders; evaluation of the need for an in-depth mental health assessment; training to manage symptoms and referral to an appropriate mental health crisis center or psychiatric physician.
2. **Required Hours of Service:**
  - a. Each client shall receive at least nine hours of services per week, in accordance with state law, including counseling.
3. **Psychiatric and Medical Services:**
  - a. Jones Wellness Center will maintain formal agreements with highly qualified psychiatrists and medical physicians who are well respected in the field of addiction.
  - b. Jones Wellness Center will accommodate the needs of each client on a case-by-case basis.
4. **Licensed Psychotherapist Caseload:**
  - a. Jones Wellness Center's primary Licensed Psychotherapists for the intensive outpatient program are professional staff who hold advanced degrees and licensure in the field of addiction.
  - b. To ensure individual needs are met, Licensed Psychotherapists are never to have more than 15 individuals on their caseload.
5. **Hours of Operation:**
  - a. Outpatient services are available Monday through Thursday, from 9 AM to 7 PM and Fridays, 9 AM to 5PM.

## **OUTPATIENT SERVICES**

1. It is the policy of Jones Wellness Center to provide **outpatient services** in accordance with state statutes and administrative code.
2. Jones Wellness Center will offer a supportive therapeutic environment for up to 8 hours per week consisting of a minimum of 1 hour of individual, group or family therapy per week and may include as many as 8 hours of service, based on the individual's needs.
3. Additional available services include:
  - a. Substance abuse education;
  - b. Life skills training, such as anger management, communication skills, employability skills, problem solving, relapse prevention, recovery training, decision making, relationship skills and symptom management;
  - c. Training or advising on health and medical issues;
  - d. Employment or educational support services to assist clients in becoming financially independent;
  - e. Mental health services for the purpose of managing stable mental health disorders; evaluation of the need for an in-depth mental health assessment; training to manage symptoms and referral to an appropriate mental health crisis center or psychiatric physician.
4. **Psychiatric and Medical Services:**
  - a. Jones Wellness Center shall establish and maintain a formal agreement with a highly qualified psychiatrist who is well respected in the field of addiction.

**5. Licensed Psychotherapist Caseload:**

- a. Primary Licensed Psychotherapists shall be professional staff who hold advanced degrees and licensure in the field of addiction. LPCs are limited to never more than 40 client caseload per week and LMFTs are limited to never more than 30 client caseload per week.

**6. Hours of Operation:**

- a. Outpatient appointments are available Monday through Thursday, from 9 AM to 5 PM and Fridays, 9 AM to 5 PM.

**PROCEDURE**

1. It is the responsibility of the Founder to ensure all behavioral health services provided by Jones Wellness Center are designed to meet the needs of the patients and within the facility's scope of services.
2. The adherence to the established program schedule is noted in the individual clinical record.
3. Variation from the established schedule is to be noted by the staff and duty and discussed with the clinical team.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD 01.04.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Leadership Structure</b>

## **POLICY**

1. It is the policy of Jones Wellness Center to ensure that a Founder manages the organization/agency.
2. The Founder ensure for the following:
  - a. Information and support systems;
  - b. Recruitment and retention of staff;
  - c. Physical and financial assets.
3. It is the policy of Jones Wellness Center to designate, in writing, an acting administrator, if the Founder is expected not to be present on the facility's premises for more than 30 calendar days, or not present on the facility's premises for more than 30 calendar days.

## **PROCEDURE**

1. The Founder is responsible to ensure the following staff positions are in existence and operate their respective departments:
  - a. Medical Director
  - b. Licensed Psychotherapist
  - c. Registered Dietician
  - d. Advanced Practical Nurse
2. It is the responsibility of the Founder, to designate in writing, an acting administrator if they are expected to be absent from the facility for over 30 days.
  - a. The Founder is to notify all staff of the change in authority and designate the timeframes.
  - b. Upon return, the Founder is to notify all staff he has re-assumed authority for the operation of the facility.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.01.07.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Orientation of Leadership</b>

## **POLICY**

1. It is the policy of Jones Wellness Center to ensure leaders have the knowledge needed for their roles in the organization or they seek guidance to fulfill their roles.
2. Leaders are oriented to all the following:
  - a. The organization's mission and vision;
  - b. The organization's safety and quality goals;
  - c. The organization's structure and the decision-making process;
  - d. The development of the budget as well as the interpretation of the organization's financial statements;
  - e. The population served by the organization and any issues related to that populations;
  - f. The separate and interdependent responsibilities and accountabilities of leaders as they relate to supporting the mission of the organization and to providing safe and quality care;
  - g. Applicable State and Federal laws and regulations, as well as Joint Commission standards.
3. The Leadership Team provides leaders with access to information and training in areas where they need additional skills or expertise.

## **PROCEDURE**

1. Upon hire, leaders are provided with a job description, outlining their specific responsibilities towards supporting the mission of the organization and to providing safe and quality care.
2. Leaders are provided with an employee handbook outlining Jones Wellness Center's mission, vision and values of Jones Wellness Center.
3. Budget, financial planning and Jones Wellness Center's financial statements are per specific job function.
4. A copy of all applicable laws and regulations is maintained in the employee cabinet.
5. Individuals are responsible for requesting training or information in areas where they need additional skills or expertise.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.02.01.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Mission, Vision, and Goals</b>

## POLICY

It is the policy of Jones Wellness Center to ensure the mission, vision, and goals of the organization support the safety and quality of care, treatment, or services. The leaders of Jones Wellness Center created Jones Wellness Center's mission, vision and goals to guide their actions. The Leaders communicate the mission, vision and goals to staff and all clients in which they serve.

## PROCEDURE

- 1) Annually the Leadership Team reviews Jones Wellness Center's mission, vision and goals to ensure they support the safety and quality of care, treatment and services provided by Jones Wellness Center.
- 2) The Mission, Vision and Goals are included in the employee handbook.
- 3) The Mission, Vision and Goals are posted in the facility.

## MISSION STATEMENT

Jones Wellness Center changes lives by providing compassionate, client-centered, integrative, and evidence-based approaches to heal mental health and eating disorders. Through respect and best practices, Jones Wellness Center offers a continuum of care including assessment, intervention, and recovery services for teens, adults, and their families.

## VISION

At Jones Wellness Center, we aim to address the needs of individuals by providing treatment for issues caused by mental health and eating disorders. Jones Wellness Center strives to utilize best practices while providing outpatient treatment services. We endeavor to guide individuals through a process of change, help them improve health and wellness, learn to live a self-directed life, and strive to reach their full potential by addressing and treating co-occurring mental health and eating disorders.

## VALUES

**Respect** - We believe in respect, client empowerment, person-centered care, self- determination, full community participation, recovery, and a culture of gentleness.

**Empathy**- We endorse effective and empathic care based on the ready availability of a competent workforce and evidence-based practices.

**Professionalism**- We support full compliance with state, federal requirements, and responsible stewardship.

**Inclusiveness**- We strive to provide a welcoming environment grounded in fairness, celebration of differences, and recognition of diverse backgrounds and abilities.

**Trauma informed care**- We believe in services that are accessible, accountable, value-based, and trauma informed.

## PHILOSOPHY

1. Jones Wellness Center recognizes behavioral health issues are a primary issue.
2. The issue affects brain-functioning and physiology, mental health, social, and behavioral functioning and the totality of personal characteristics.
3. The illness if left untreated is a chronic, progressive, and fatal illness.

4. The illness is pervasive and affects not only the individual but has an impact on all who interact with them.
5. We believe each individual has the right to be treated with respect and dignity as they are valued by society.
6. We believe each individual has the right to treatment, the most appropriate level of treatment, regardless of creed, gender, race, sexual orientation, age, or origin and they have the inherent potential for change and growth.

### ***Our Goals***

1. Reduce the symptomology for patients as evidenced by:
  - Reduce acuity level based off evidence based assessment tools (PCL5, GAD7, PHQ9, etc.)
  - Clients' self-report based off surveys
2. Reduce high risk behavior responsible for infection as evidenced by:
  - HCA/HIV, Hepatitis, STD risk assessment, education and referrals for testing
  - Monitoring infection based practice
  - Educating when necessary on infection control
3. Promote health equity as evidenced by:
  - Treatment planning with emphasis on patient driven health equity measures
  - Client's self-reported health equity survey data

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.02.03.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Communication of Safety and Quality</b>

**POLICY**

It is the policy of Jones Wellness Center for the leaders to regularly communicate with each other on issues of safety and quality.

**PROCEDURE**

1. Jones Wellness Center Founder is also the Safety Officer.
2. The Founder is responsible for facilitating Jones Wellness Center's activities towards safety and quality.
3. Jones Wellness Center has established a Safety Committee, a standing committee of the performance improvement committee which meets as needed with a minimum of once per quarter.
4. Documentation of the Safety Committee and its activities is maintained for review and inclusion in Jones Wellness Center's performance improvement activities and annual evaluations.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.01.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Culture of Safety and Quality</b>

## POLICY

1. It is the policy of Jones Wellness Center to strive to be a high performing agency in which the culture is focused on maintaining excellence in performance.
  - a. We believe that to be a great program, that employee safety should be promoted as a top priority.
2. Staff of Jones Wellness Center accept the safety and quality of care, treatment, or services as personal responsibilities and work together to minimize any harm that might result from unsafe or poor quality of care, treatment, or services.
3. It is the policy of Jones Wellness Center for the leaders to create and maintain a culture of safety and quality throughout the organization.
4. It is Jones Wellness Center's belief that safety and quality thrive in an environment that supports teamwork and respect for other people, regardless of their position in the organization.
5. Leaders demonstrate their commitment to quality and set expectations for those who work in the organization.
6. Leaders evaluate the culture on a regular basis using a variety of methods, such as formal surveys, staff interviews, and data analysis.
7. Leaders encourage teamwork and create structures, processes, and programs that allow this positive culture to flourish.
  - a. Staff behavior that intimidates others and affects morale or staff turnover undermines a culture of safety and can be harmful to individuals served.
8. Leaders address such behavior at all levels of the organization, including management, clinical and administrative staff, licensed independent practitioners, and governing body members.

## PROCEDURE

1. Jones Wellness Center has an established Code of Ethics that defines acceptable behavior and behaviors that undermine a culture of safety: (LD.03.01.01-1).
2. Jones Wellness Center has established a compliance hotline (LD.03.01.01-2).
3. Jones Wellness Center evaluates the culture of Jones Wellness Center at least annually through a staff satisfaction survey (LD.03.01.01-3).
4. Staff can rate whichever area they want but are encouraged to review multiple areas.
5. Jones Wellness Center collects client satisfaction surveys, and analyzes the results on a monthly, quarterly and annual basis.
6. Jones Wellness Center has established a disciplinary action plan for managing behaviors that undermine a culture of safety (LD.03.01.01-4).
7. Employees are educated on ethics and the culture of safety during the New Hire Orientation.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.01.01, EP 1</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Code of Ethics</b>

**POLICY**

It is the policy of Jones Wellness Center to establish a Code of Ethics to define acceptable behavior and behaviors that undermine a culture of safety.

**PROCEDURE**

1. Employees are provided a copy of the Code of Ethics upon hire.
2. A copy of the Code of Ethics is included in the Employment Handbook and posted on the Employee cabinet.

**Jones Wellness Center**

**Code of Ethics**

1. To believe in the dignity and worth of all human beings, and to pledge to provide service for the welfare and betterment of all members of society.
2. To recognize the right to humane treatment of those suffering directly or indirectly from alcoholism or other drug dependency.
3. To promote and assist in the recovery of all persons served by providing the highest quality of care.
4. To respect client's religious and/or spiritual beliefs and values and maintain a culturally competent environment.
5. To maintain a professional relationship with all the people served, assisting them to help themselves and referring them promptly to others when this is in the individual's best interest.
6. To adhere strictly to the established rules of confidentiality of all records, materials and knowledge concerning persons served in accordance with the regulations and policies of Jones Wellness Center and any regulatory body.
7. To respect the rights, views and positions of other professional staff, addiction treatment professionals, and allied health professionals.
8. To respect Jones Wellness Center's policy and procedures and remain consistent with professional standards and allied health professionals and agencies.
9. To contribute one's ideas and findings to the general body of knowledge concerning addictive disease and to circulate these ideas and findings through appropriate professional channels.
10. To regularly evaluate one's own professional strengths, limitations, biases and levels of effectiveness, striving for self-improvement and seeking professional development through further education and training.
11. To respect the unique characteristics of the therapeutic relationship which demands sound, non-exploitative interpersonal and financial transactions between the professional and the consumer to provide effective treatment.
12. To refrain from undertaking any activity whereby one's personal conduct, including the abuse of alcohol and other mood-altering drugs, inappropriate interaction, relationship with consumers, illegal activities, violence, intimidation and other behaviors, when it is likely to result in inferior professional services, denigrate the professional in general or constitute a violation of law.
13. To avoid claiming directly or implying professional qualifications that exceed those obtained, accepting that professional competency in one field should not be used as an implication of competency in an unrelated field.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.01.01, EP 2</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Corporate Compliance Hotline</b>

## **PURPOSE**

The purpose of this policy is to define and make explicit the relationship between governance and organizational management.

## **RESPONSIBILITY**

It is the responsibility of the Founder and/or designee to implement this policy and procedure. It is the responsibility of the Founder to disseminate this information to employees under his/her direction.

## **POLICY**

1. At Jones Wellness Center, providing our clients, staff and stakeholders with the highest level of care and professionalism is our top priority. In order to help us in this effort:
  - a. It is the policy of Jones Wellness Center to ensure all staff and consumers of Jones Wellness Center are provided with a confidential means to report issues of compliance.

## **PROCEDURE**

1. Jones Wellness Center has engaged a compliance hotline for all staff, clients and stakeholders of Jones Wellness Center.
2. The compliance hotline is a confidential means to report the following:

<ul style="list-style-type: none"> <li>• <b>Conflict of Interest</b></li> <li>• <b>Billing Errors</b></li> <li>• <b>Environment of Care</b></li> <li>• <b>Fraud</b></li> <li>• <b>Health Violation</b></li> <li>• <b>HIPAA Privacy/Security</b></li> <li>• <b>Housekeeping</b></li> <li>• <b>Human Resources</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Medical Staff</b></li> <li>• <b>Abuse</b></li> <li>• <b>Policy Violation</b></li> <li>• <b>Prejudice or Sexual Harassment</b></li> <li>• <b>Substance Abuse</b></li> <li>• <b>Theft</b></li> <li>• <b>Time card abuse/fraud</b></li> <li>• <b>Workplace violence</b></li> </ul>
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3. The compliance hotline is managed by 24-hour staff and individuals may remain anonymous if they choose.
4. All complaints made to the hotline are investigated with resolution provided to any complainant.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.01.01, EP2</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Staff Satisfaction Survey</b>

It is the policy of Jones Wellness Center to gather information from staff on the culture of Jones Wellness Center and seek ways to ensure Jones Wellness Center is viewed by its employees as a safe environment and services are of high quality.

#### **PROCEDURE**

1. A minimum or at least annually, Jones Wellness Center releases a Staff Satisfaction Survey.
2. The results of each survey are accumulated and analyzed.
3. The results of the survey are reviewed by the Leadership Team and issues of concern or identified areas of improvement are addressed as needed.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.01.01, EP4</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Disciplinary Action</b>

## **RESPONSIBILITY**

It is the responsibility of the Founder and/or designee to implement this policy and procedure. It is the responsibility of the Founder to disseminate this information to employees under his/her direction.

## **POLICY**

1. It is the policy of Jones Wellness Center to ensure a safe, ethical work and therapeutic environment and to support all agency staff in their professional growth.
2. To ensure Jones Wellness Center's business is conducted properly and efficiently, employees must conform to certain standards of attendance, conduct, work performance and other work rules and regulations.
  - a. Supervisors use coaching and counseling techniques in resolving situations.
  - b. If, however, these techniques do not produce the desired results, or a serious incident occurs requiring formal discipline, the following procedures are followed.
3. This policy pertains to matters of conduct as well as the agency employee's competence.
4. However, an employee who does not display satisfactory performance and accomplishment on the job may be dismissed, in certain cases, without resorting to the sets forth in this policy.
5. Under normal circumstances, managers are expected to adhere to the seven (7) step procedure outlined below.
  - a. Situations, however, due to the seriousness of the offense, may justify the omission of one or more steps in the procedure.
  - b. At the sole discretion of the Founder, Jones Wellness Center's administration may decide to repeat a disciplinary step.

## **Types of Disciplinary Action**

1. **Written Warning:**
  - a. Written warnings are placed in the employee's personnel record.
    - i. Such a warning shall be given when the employee's supervisor determines that there are extenuating circumstances that lessen culpability on the part of the employee.
    - ii. Such warnings shall not be considered as equivalent to a warning written reprimand as a preliminary step to possible discharge.
  - b. Written warnings will include the reason for the manager's dissatisfaction and any supporting evidence.
    - i. The employee will have an opportunity to defend their actions and challenge the opinion of the Founder at the time the warning is issued.
    - ii. Disciplinary actions may also include fines, suspensions or other measures deemed appropriate to the circumstances.
2. **Written Reprimand:**
  - a. Written reprimands are placed in the employee's personnel record.
    - i. Such warnings and reprimands may not be removed from the individual's record.
    - ii. Normally, however, if the employee does not receive disciplinary action for the same offense within a period of one (1) year, this warning and reprimand shall not be used in any evaluation of the employee.
3. **Probation:**
  - a. An employee is placed on probation on temporary status for 30, 60 or 90 days to monitor and improve performance in specific areas of deficiency.
4. **Termination:**
  - a. Upon termination, an employee separation is effective immediately upon approval of the disciplinary action as noted below.
  - b. All pertinent facts will be carefully reviewed, and the employee will be given a full opportunity to explain

his/her conduct before any decision is reached.

- i. The Founder will give a second opinion concerning the unacceptable behavior before dismissal occurs.

**5. Categories of Offenses and Disciplinary Actions:**

- a. The following three categories represent typical grounds for disciplinary action but are not the only permissible grounds.

**6. Category I-Disciplinary Actions**

- a. First Offense - Warning and written reprimand for file
- b. Second Offense - Warning and written reprimand for file
- c. Third Offense – Probation
- d. Fourth Offense – Termination

**7. Offenses:**

- a. Absence-failure to report an absence of one (1) day without calling in: excessive absence or lateness;
- b. Leaving work before the end of the shift without permission, not being ready to work at the start of the shift;
- c. Failure to follow instructions;
- d. Negligence in protecting client confidentiality or carelessness;
- e. Failure to submit reports as required except when excused by a supervisor;
- f. Failure to report an incident;
- g. Failure to report one's use of medications prescribed by a competent authority;
- h. Reporting for work after injury or three (3) days illness without a physician's approval in writing;
- i. Disregard or violation of a safety rule;
- j. Unsatisfactory or careless work; failure to meet quality standards; mistakes due to carelessness or failure to get necessary information or instructions;
- k. Involvement in an accident chargeable to employee while operating a Jones Wellness Center vehicle;
- l. Excessive use of agency telephone for personal calls;
- m. Soliciting during working hours; selling merchandise or collecting funds of any kind for charities or others without authorizations, or at a time that interferes with work of another employee on company premises;
- n. Failure to maintain a neat and clean appearance in terms of the standards established by policy; any departure from accepted conventional codes of dress or personal grooming, wearing improper or unsafe clothing;
- o. Eating food and beverages in undesignated areas during working hours.

**8. Category II-Disciplinary Actions**

- a. First Offense - Warning and written reprimand for file
- b. Second Offense – Termination

**9. Offenses:**

- a. Abuse of sick leave;
- b. Failure to follow instruction given by a supervisor;
- c. Outside employment without knowledge or approval of Founder;
- d. Providing treatment services beyond the scope of practice-medical or clinical;
- e. Using tobacco products during online sessions;
- f. Unintentional breach of professional ethics;
- g. Negligence in protecting client confidentiality or carelessness in handling client records with possible adverse effect on the client or agency;
- h. Failure to respect client rights;
- i. Misrepresentation of hours worked; alteration of employee records or attendance documents;
- j. Soliciting a client to perform personal services for the employee's benefit;
- k. Failure to report a serious incident or accident; failure to report incident that caused damage to company property;
- l. Use of abusive language to an employee, co-worker, supervisor or public; indifference or rudeness towards a client or fellow employee, any disorderly antagonistic conduct on company premises;
- m. Violation of security or safety rules or failure to observe safety rules of Jones Wellness Center; failure to

- wear required safety equipment; tampering with agency property, vehicle or other equipment;
- n. Sleeping on the job; loitering or loafing during working hours;
- o. Any act of harassment, sexual, racial, or other; telling sexist or racial-type jokes;
- p. Making racial or ethical slurs;
- q. Smoking in restricted areas or at non-designated times, as specified by agency rules;
- r. Speeding or careless driving of an agency vehicle resulting in a violation, or a 2<sup>nd</sup> party eyewitness report;
- s. Posting, removing or altering notices on any bulletin board on agency property without permission.

#### **10. Category III-Disciplinary Actions**

- a. First Offense – Termination

#### **11. Offenses:**

- a. Absence - three (3) days without calling in;
- b. Reporting to work while under the influence of alcohol or illegal drugs;
- c. Insubordination or refusing to obey instructions properly issued by your manager pertaining to your work; refusal to help on a special assignment;
- d. Breach of confidentiality of personnel or client information giving confidential or proprietary information to other organizations or to unauthorized agency employees;
- e. Engaging in an act of sabotage; malicious gossip and/or spreading rumors; engaging in behavior designed to create discord and lack of harmony; interfering with another employee on the job; willfully restricting work output or encouraging others to do the same;
- f. Deliberate breach of professional ethics or failure to report a major incident;
- g. Soliciting or accepting unauthorized fee or gift;
- h. Failure to protect client confidentiality or client records resulting in serious harm or damage to a client or Jones Wellness Center;
- i. Removing material from a client record without authorization;
- j. Immoral conduct or indecency on company property; engaging in sexual behavior with a client or soliciting a client to engage in sexual acts;
- k. Soliciting clients for treatment in one's own or another's private practice;
- l. Pilfering money or other items from clients, co-workers or Jones Wellness Center;
- m. Failure to surrender confiscated contraband to proper authority;
- n. Conducting a lottery or gambling while on duty;
- o. Willful or gross negligence causing the destruction of agency property or the property of fellow employees, supervisors, clients or visitors;
- p. Engaging in criminal conduct or acts of violence against another employee, supervisor, or client; making threats of violence against another employee or provoking a fight with any staff member or client;
- q. Theft of property; or the property of fellow employees; unauthorized possession of any company property, including documents without prior permission from management; unauthorized use of company equipment or property;
- r. Conviction and imprisonment for a felony while employed by Jones Wellness Center;
- s. Dishonesty; falsifying application for concealing information on employment records; lying about sick or personal leave; falsifying reason for a leave of absence or other data requested by Jones Wellness Center; alteration of company records or other company documents;
- t. An act of harassment or deliberate display of intimidation or harm of another employee, client, supervisor or visitor;
- u. Unauthorized display of a firearm or weapon while on duty;
- v. Willful violation of any company rule; any deliberate action that is extreme in nature and is obviously detrimental to Jones Wellness Center and the mission and values;
- w. Negligence or any careless action which endangers the life or safety of another person;
- x. Refusal to submit to a drug test

#### **PROCEDURE:**

1. If an employee commits an offense that requires disciplinary action, the employee's immediate supervisor shall consult with the Founder.
2. Disciplinary action initiated by a supervisor cannot become effective until the issue has been reviewed and approved by the Founder.
3. If the Founder is in agreement, a Notice of Disciplinary Action form is completed.
4. Upon approval, the supervisor meets with the employee to discuss the disciplinary action. The policy and procedure that has been violated and the need for disciplinary action are reviewed.
5. The employee is required to sign the Notice of Disciplinary Action Form and a copy is given to the employee.
6. Notice of Disciplinary Action forms are filed in the employee's personnel file.
7. If the employee does not receive further disciplinary actions within a 12-month period, the Notice of Disciplinary Action form is removed from the personnel file.

**Rights of the Employee:**

1. If the employee believes that the disciplinary action is unfair or unjust, he/she may refuse to sign the Notice of Disciplinary Action form.
  - a. The supervisor shall then call in a witness to attest in writing on the form that the employee refused to sign.
  - b. Unless the employee files a complaint or grievance, the disciplinary action will stand.
2. If the employee elects, the employee may file a complaint or grievance, using Jones Wellness Center's Grievance Form, following Jones Wellness Center's Grievance Protocol.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.02.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Data Driven Decision</b>

**POLICY**

1. It is the policy of Jones Wellness Center to use data and information to guide decisions and to understand variation in the performance of processes supporting safety and quality.
2. It is the policy of Jones Wellness Center to implement a performance measurement and management system for both business and service delivery to allow Jones Wellness Center to look objectively at how well it is accomplishing its mission.
3. The organization has a written description of its performance measurement and management system that includes the mission, programs and services seeking licensure and accreditation, objectives of the programs and services seeking accreditation and the personnel responsibilities related to the performance measurement and management.

**Clinical:** The Leadership Team, in accordance with the National Outcome Measurement System from the Substance Abuse and Mental Health Service Administration (SAMHSA) establishes the performance outcome measures for the persons served.

**PROCEDURE**

1. Jones Wellness Center collects data on all aspects of the company.
2. See the Performance Improvement Plan.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.03.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Organizational Planning</b>

## POLICY

It is the policy of the leaders to use organizational planning to establish structures and processes that focus on safety and quality.

## PROCEDURE

1. It is the policy of Jones Wellness Center to develop an annual strategic plan.
  - a. The strategic plan is based on the results from a Strengths Weaknesses Opportunities Threats (SWOT) analysis.
  - b. The SWOT Analysis is to assess the internal and external strengths, weaknesses, opportunities and threats faced by the organization, allowing Jones Wellness Center to deal effectively with the issues raised.
2. SWOT Analysis:
  - a. Organizational strengths are those attributes of the organization that are helpful to achieving the goals and objectives, the weaknesses are the attributes of the organization that are harmful to achieving the objectives.
    - i. The opportunities are external conditions that are helpful and promote the achievement of Jones Wellness Center's objectives and the threats are external conditions which could do damage to Jones Wellness Center's performance.

## PROCEDURE:

1. The Founder is responsible for scheduling the strategic planning process –through the performance improvement process.
2. The Leadership Team (LT) meets to discuss the process.
3. Areas of concentration may include but are not limited to the following:
  - a. Expectations of persons served
  - b. Expectations of other stakeholders, i.e. parents, agency staff and referring agencies
  - c. The competitive environment
  - d. Financial opportunities
  - e. Financial threats
  - f. The organization's capabilities
  - g. Service area needs
  - h. Demographics of the service area
  - i. Jones Wellness Center's relationships with external stakeholders
  - j. The regulatory environment
  - k. The legislative environment
  - l. The use of technology to support efficient operations, effective service delivery and performance improvement
  - m. Information from the analysis of performance
4. Informational resources include feedback from stakeholders, i.e. client and family surveys, staff surveys, and feedback from collaborative agencies, i.e. referral agencies.
5. LT or designees are responsible for disseminating surveys to clients, staff and other identified stakeholders, i.e. families, referral sources, etc.
6. The Founder is responsible for walking the participants through the SWOT analysis.
  - a. Initiate and agree on a strategic planning process
  - b. Identify formal and informal organizational mandates
  - c. Clarify organizational mission and values
  - d. Assess the external and internal environments

- e. Identify the strategic issues facing the organization (stakeholder analysis)
- f. Formulate strategies to manage the issues
- g. Review and adopt the strategies or strategic plan
- h. Establish an effective organizational vision
- i. Develop an effective implementation process
- j. Reassess strategies and the strategic planning process

7. The LT is responsible for the implementation of the action steps.
8. The Founder is responsible for the dissemination of Jones Wellness Center's annual strategic plan.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.04.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Timely and Accurate Communication of Data</b>

## **POLICY**

It is the policy of Jones Wellness Center to communicate information related to safety and quality to those who need it, including staff, individuals served, families, and external interested parties.

## **PROCEDURE**

1. Jones Wellness Center has established a communication network comprised of the following to communicate information related to safety and quality to those who need it, including staff, individuals served, families, and external interested parties:
  - a. For Staff:
    - i. DropBox: An internal intranet which provides alerts and up to date data on selected data points
    - ii. Office 365: Encompasses One Drive; Outlook and SharePoint
    - iii. Emergency Call Tree
    - iv. Weekly Treatment Team Meetings
    - v. Monthly Leadership Meetings
  - b. Individuals Served:
    - i. Client emails
    - ii. Group and individual contact with therapeutic staff
  - c. Families and Interested Parties (Stakeholders):
    - i. Website
    - ii. Available Upon Request:
      1. State Auditing Reports
      2. Joint Commission Report
      3. Performance Data

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.05.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Performance Improvement Changes</b>

**POLICY**

1. It is the policy of Jones Wellness Center to implement changes in existing processes to improve the performance of the organization.
2. Change is consistent and flowing throughout the organization.

**PROCEDURE**

1. As part of the Performance Improvement Plan, Jones Wellness Center tracks and analyzes data on performance, incident reports, clinical indicators, etc.
2. Root, cause, analysis protocols are in place to address areas where Jones Wellness Center is not on target for the benchmarks of established goals.
3. Leaders are responsible to outline the changes, identify the steps to transition to the new process and disseminate the information to all middle management.
4. The PI committee continuously reviews the data and assesses the effectiveness of the new process on Jones Wellness Center's performance.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.03.06.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Staff Focus on Safety and Quality</b>

## **POLICY**

It is the policy of Jones Wellness Center to ensure all staff who work in Jones Wellness Center are focused on improving safety and quality.

## **PROCEDURE**

1. Jones Wellness Center's leaders continuously design work processes to focus safe on safety and quality issues
  - a. Review of data from:
    - i. Incident Reports
    - ii. Grievances
    - iii. Culture of Safety surveys
    - iv. Patient Satisfaction surveys
  - b. Staffing patterns for clinical sites has enough and mix of staff to support safe, quality care, treatment and services, i.e.:
    - i. Licensed Psychotherapist: 1/15
    - ii. Registered Dietician
    - iii. Medical Staff: As indicated
  - c. Staff Evaluations: Competency Training and Evaluation
  - d. Insurance: All facilities and vehicles are insured
  - e. Risk Management Plan
  - f. Adherence to all Fire and Safety Codes
  - g. Infection Control Plan
  - h. Continuous Evaluation through Performance Improvement Planning

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.01.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Compliance with Laws and Regulations</b>

## POLICY

It is the policy of Jones Wellness Center to comply with all applicable laws and regulations pertaining to the implementation and administration of a behavioral healthcare facility. It is the responsibility of the Leadership Team to ensure all legal and regulatory requirements are acquired and met by Jones Wellness Center and agency staff.

## PROCEDURE

1. It is the responsibility of the Founder to ensure Jones Wellness Center complies with all legal requirements.
2. The Founder and Leadership Team is responsible to continuously survey the environment to determine Jones Wellness Center's legal obligations.
3. Jones Wellness Center contracts with legal counsel to assist in meeting their legal obligations.
4. Jones Wellness Center has developed policies and procedures to address the legal operational standards including but not limited to:
  - a. Business Regulatory Standards
  - b. Service Provision
  - c. Financial Practices
  - d. Human Resource Management
  - e. Risk Management
5. An overview of Jones Wellness Center's legal requirements is included in the Employee Orientation and Handbook.

### Legal Responsibility: Regulatory

## POLICY

It is the policy of Jones Wellness Center to be licensed, or certified, or have permits, in accordance with law and regulation, to provide the care, treatment, or services for which the organization is seeking accreditation.

## PROCEDURE

1. It is the responsibility of the Founder to ensure Jones Wellness Center complies with all regulatory requirements.
2. The Founder and Leadership Team is responsible to continuously survey the environment to determine Jones Wellness Center's regulatory obligations.
3. Jones Wellness Center contracts with legal counsel to assist in meeting their regulatory obligations.
4. Jones Wellness Center has implemented extensive policies and procedures to address regulatory requirements, inclusive of but limited to:
  - a. HIPAA-45 CFR 160, 162, and 164
  - b. CFR 42, Part 2
  - c. Department of Labor/Revenue
  - d. The State's Industrial Commission
  - e. Title VII of the Civil Rights Act of 1964
  - f. 2018 International Fire Code; Title IV, Chapter 36, Article 2 and 3
5. An overview of Jones Wellness Center's legal requirements is included in the Employee Orientation and Handbook.

## **Legal Responsibility: Client Confidentiality**

### **POLICY:**

Jones Wellness Center is committed to complying with all applicable laws for confidentiality.

### **PROCEDURE:**

1. It is the responsibility of the Founder to ensure Jones Wellness Center complies with all confidentiality requirements.
2. The Founder and Leadership Team is responsible for continuously surveying the environment to determine Jones Wellness Center's confidentiality obligations.
3. Jones Wellness Center has established protocols to ensure all program participant records, agency staff and administrative records are securely maintained and information released in accordance with applicable regulatory requirements.
4. Jones Wellness Center has implemented extensive policies and procedures to address regulatory requirements, inclusive of but limited to:
  - a. HIPAA-45 CFR 160, 162, and 164
  - b. Title 42, code of Federal Regulations, Part 2
5. Jones Wellness Center has a Business Associate Agreement (BAA) for all community-based service providers who provide routine services for our clients.
  - a. The Business Associate Contract is approved by the legal department.
  - b. A copy of the BAC is maintained at the facility and at the Corporate Office.
6. Contracts must be signed by the Founder to discuss the financial and legal aspects of Jones Wellness Center.
7. An overview of Jones Wellness Center's confidentiality requirements is included in the Employee Orientation and Handbook.

## **Legal Responsibility: Administrative Records**

### **POLICY:**

1. It is the policy of Jones Wellness Center to ensure the confidentiality of administrative records. Jones Wellness Center defines "administrative" records as the following:
  - a. Personnel Records
  - b. Contracts
  - c. Budgets
  - d. Billing Information
  - e. Fiscal Reports
  - f. Legal Information

### **PROCEDURE:**

1. It is the responsibility of the Founder to ensure all administrative records are maintained in accordance with the highest standards of security.
2. Personnel Records:
  - a. The Founder is responsible to ensure that all paper personnel files are secured under a two-lock system.
  - b. Access is limited to the employee and Founder.
  - c. Health information, i.e. mandatory testing results, are secured in a separate envelope and sealed access is limited to the Founder and employee.
  - d. Electronic copies of the HR files are maintained on a secure server according to the IT Plan.

## **Legal Responsibility: Reporting**

### **POLICY:**

It is the policy of Jones Wellness Center to comply with all applicable reporting requirements.

### **PROCEDURE:**

1. It is the responsibility of the Founder to ensure Jones Wellness Center complies with all reporting requirements.
2. The Founder and Leadership Team is responsible for continuously surveying the environment to determine Jones Wellness Center's reporting obligations.
3. Jones Wellness Center has established protocols to ensure Jones Wellness Center reports critical incidents, illegal activities and suspected child abuse to the proper authorities.
4. Jones Wellness Center has implemented extensive policies and procedures to address reporting requirements, inclusive of but limited to:
  - a. Title V of the Americans with Disability Act
  - b. Department of Health
5. It is at the discretion of the Founder to discuss the financial and legal aspects of Jones Wellness Center.
6. An overview of Jones Wellness Center's confidentiality requirements is included in the Employee Orientation and Handbook.

## **Legal Responsibility: Licensing**

### **POLICY:**

Jones Wellness Center is committed to complying with all applicable licensing requirements.

### **PROCEDURE:**

1. It is the responsibility of the Founder to ensure Jones Wellness Center complies with all licensing requirements.
2. The Founder and Leadership Team is responsible to continuously survey the environment to determine Jones Wellness Center's licensing obligations.
3. Jones Wellness Center has established protocols to ensure Jones Wellness Center complies with all licensure requirements.
4. Agency Licenses:
  - a. Jones Wellness Center holds, at a minimum, the following license(s):
    - i. County Business Tax Receipts
    - ii. Municipality Business Tax Receipts
    - iii. Substance Abuse Licenses
    - iv. Motor Vehicle
    - v. CLIA (Lab Certification)
    - vi. Software
  - a. Responsibility:
    - i. County Business Tax Receipts - Founder
    - ii. Municipality Business Tax Receipts - Founder
    - iii. CLIA - Consultant
    - iv. Motor Vehicle - Founder
    - v. Software - Founder
  - b. Posting: Licenses are posted in a common area within the facility.
5. Employee / Consultant Specific Licenses:
  - a. Individual staff or consultants may hold any of the following licenses:
    - i. State Administrative Code
    - ii. State Statutes: Licensed Psychotherapists
    - iii. State Statute: Physician, Advanced Registered Nurse Practitioner, Physician Assistant, Registered Nurse or Licensed Practical Nurse

- iv. State Statute: Physicians
- b. Responsibility: Each employee is responsible to maintain their license in accordance with their scope of practice.
- c. Each employee/consultant is responsible to provide a current license to the Founder for inclusion in their personnel file.

### **Legal Responsibility: Contractual**

#### **POLICY:**

Jones Wellness Center is committed to complying with contractual requirements. Jones Wellness Center does not contract with state, federal or independent insurance companies for the provision of their services.

#### **PROCEDURE:**

1. It is the responsibility of the Founder to ensure Jones Wellness Center complies with all contractual requirements.
2. The Founder and Leadership Team is responsible for continuously surveying the environment to determine Jones Wellness Center's contractual needs and obligations.
3. All contracts are developed and executed at the discretion of the Founder.
4. Jones Wellness Center has established protocols to ensure Jones Wellness Center complies with all contractual requirements.
5. The Founder is responsible for maintaining a list of Jones Wellness Center's contracts and ensuring compliance.
6. On an annual basis, the Founder reviews Jones Wellness Center's contracts and determines the necessity for continuance.

### **Legal Responsibility: Debt Covenants**

#### **POLICY:**

Jones Wellness Center is committed to complying with debt covenants from their creditors.

#### **PROCEDURE:**

1. It is the responsibility of the Founder to ensure Jones Wellness Center complies with all debt covenants.
2. The Founder is responsible for maintaining an accounts ledger, indicating Jones Wellness Center's creditors.
3. The Founder is responsible for maintaining a file for each creditor.
4. The file contains documentation stating the limits at which Jones Wellness Center can further lend or other such stipulations.
5. The Founder and Leadership Team is responsible for continuously surveying the environment to determine Jones Wellness Center's financial needs and obligations.
6. All debts are executed at the discretion of the Founder.

### **Legal Responsibility: Corporate Status**

#### **POLICY:**

Jones Wellness Center is committed to complying with requirements of Jones Wellness Center's corporate status, i.e. Limited Liability Corporation.

#### **PROCEDURE:**

1. It is the responsibility of the Founder to ensure Jones Wellness Center complies with Jones Wellness Center's legal corporate status.
2. Jones Wellness Center maintains a contractual relationship with legal counsel to assist in corporate matters.
3. Annually, the Founder is responsible to file an Annual Report to the State's Secretary of State Corporations department. [https://www.sos.state.tx.us/corp/forms\\_option.shtml](https://www.sos.state.tx.us/corp/forms_option.shtml)
4. An electronic file for the Annual Report is maintained by the Founder.

5. A copy of the Annual Report is available to all staff upon request.

### **Legal Responsibility: Rights of Individuals Served**

#### **PURPOSE:**

To assist Jones Wellness Center to be in compliance with all legal and regulatory requirements.

#### **RESPONSIBILITY:**

1. It is the responsibility of the Leadership Team to ensure all legal and regulatory requirements are acquired and met by Jones Wellness Center and agency staff.
2. It is the policy of Jones Wellness Center to ensure Patient Rights are conspicuously posted on the premises in the facility and that at the time of admission, a resident or the Client's representative receives a written copy of their Resident Rights.
3. A copy of Client's Rights is posted on the Resident Bulletin Board in the facility and included in the Client Handbook.
4. Resident Rights include but are not limited to the following:
  - a. All residents are to be treated with dignity, respect, and consideration.
  - b. A resident is not subjected to:
    - i. Abuse;
    - ii. Neglect;
    - iii. Exploitation;
    - iv. Coercion;
    - v. Manipulation;
    - vi. Sexual Abuse;
    - vii. Sexual Assault;
    - viii. Seclusion/Restraint;
    - ix. Retaliation for submitting a complaint to the department or another entity;
    - x. Misappropriation of personal and private property by the behavioral health facility's personnel members, employees, volunteers, or students;
    - xi. Discharge or transfer, or threat of discharge or transfer, for reasons unrelated to the Client's treatment needs, except as established in a fee agreement signed by the resident or the resident's representative;
    - xii. Treatment that involves the denial of: Food, the opportunity to sleep, or the opportunity to use the toilet.
  - c. Is allowed to:
    - i. Associate with individuals of the client's choice; receive visitors and make telephone calls during the hours established by the behavioral health inpatient facility.
    - ii. Have privacy in correspondence, communication, visitation, financial affairs, and personal hygiene.
    - iii. Unless restricted by a court order, send and receive uncensored and unopened mail.
  - d. A resident or the Client's representative:
    - i. Except in an emergency, either consents to or refuses treatment.
    - ii. May refuse or withdraw consent for treatment before treatment is initiated, unless the treatment is ordered by a court according to State laws and regulations; is necessary to save the Client's life or physical health; or is provided according to law.
    - iii. Except in an emergency, is informed of proposed treatment alternatives, associated risks, and possible complications.
    - iv. Is informed of the following:
      1. Jones Wellness Center's policy on health care directives
      2. The resident complaint processes
    - v. Except as otherwise permitted by law, provides written consent to the release of information in the Client's:

- 1. Medical record(s)
- 2. Financial record(s)
- e. If Jones Wellness Center's Medical Director determines that a patient's treatment requires the facility to restrict the patient's ability to participate in an activity associated with their rights, the Medical Director is to document the specific treatment purpose in the patient's medical record that justifies restricting the patient from the activity, inform the patient of the reason why the activity is being restricted, and inform the patient of the right to file a complaint and the procedure for filing a complaint.

### **PROCEDURE: (SEE SPECIFIC PROCEDURES)**

- 1. It is the responsibility of the Founder or designee to ensure a poster with the following is posted in the waiting room:
  - a. Texas Department of Family and Protective Services
  - b. Texas Department of State Health Services
  - c. Texas Human Rights Committee
  - d. Texas Health and Human Services Commission
- 2. Upon admission to the facility, clients will be provided a Client Handbook which outlines their basic client rights and grievance protocol. Acceptance of the Handbook and Orientation to their basic client rights and grievance procedures is to be noted in the progress notes.
- 3. Upon hire, staff is provided an Employee Handbook which outlines Jones Wellness Center's description of basic client rights and grievance protocol. Documentation indicating employees received the Handbook and acknowledged awareness of the client's basic human rights and grievance protocol is to be maintained in the personnel file.
- 4. Grievances are to be tracked and incorporated into the continuous quality management protocol.
- 5. Grievance Protocol:
  - a. Grievance Forms are maintained in the waiting room.
  - b. Completed Grievance Forms are to be placed in a sealed envelope.
  - c. Sealed envelopes are to be given to their primary Licensed Psychotherapist.
  - d. Primary Licensed Psychotherapist is to review the grievance within 3 days and provide a written notification of the decision to the appellant.
  - e. If the concern is regarding the Primary Licensed Psychotherapist, the grievance form may be submitted to the Founder or owner.
  - f. If the grievance is not resolved, the grievance is submitted up the organizational chain of command and written notification of the decision is provided to the appellant within 3 days.
  - g. If the grievance is not resolved internally, the individual may contact the local Department of Health Office. Primary Licensed Psychotherapist is to log and track the grievance until resolved or concluded by actions of Jones Wellness Center's governing body.
  - h. A copy of the grievance is submitted to the Founder for inclusion in Jones Wellness Center's quality assurance activities. The grievances are logged, tracked and analyzed for trends.

### **Legal Responsibility: Privacy of Persons Served**

#### **PURPOSE:**

To assist Jones Wellness Center to be in compliance with all legal and regulatory requirements.

#### **RESPONSIBILITY:**

It is the responsibility of the Leadership Team to ensure all legal and regulatory requirements are acquired and met by Jones Wellness Center and agency staff.

#### **POLICY:**

Jones Wellness Center is committed to ensure the privacy of persons served.

**PROCEDURE:**

1. It is the responsibility of the Founder and Medical Director to ensure Jones Wellness Center protects the privacy of the people served.
2. Jones Wellness Center operates in accordance with HIPAA-45 CFR 160, 162, and 164; Title 42, code of Federal Regulations, Part 2.
3. Jones Wellness Center operates on a “need to know” basis, meaning not all employees have access to all client information and client information is only discussed as needed to insure for the continuity of services.
4. Upon admission to Jones Wellness Center, both clients and staff are oriented to Jones Wellness Center’s privacy protocols.
5. A copy of the Confidentiality and HIPAA laws is included in the Client and Employee Handbooks.
6. A copy of the Confidentiality and HIPAA laws is acknowledged by both clients and employees, with a written acknowledgement placed in the client file and/or employee file.

**Legal Responsibility: Employment Screening**

**PURPOSE:**

To assist Jones Wellness Center to be in compliance with all legal and regulatory requirements.

**RESPONSIBILITY:**

It is the responsibility of the Leadership Team to ensure all legal and regulatory requirements are acquired and met by Jones Wellness Center and agency staff.

**POLICY:**

Jones Wellness Center is committed to ensure Jones Wellness Center adheres to all legal requirements pertaining to employment.

**PROCEDURE:**

1. It is the responsibility of the Founder and Medical Director to ensure Jones Wellness Center conducts all employment activities in accordance with acceptable legal standards.
2. Jones Wellness Center at a minimum operates in accordance with the following:
  - a. Title V of the Americans with Disabilities Act
  - b. Personnel Policies
  - c. State’s Name Statutes: Screening
  - d. [Title VII of the Civil Rights Act of 1964 \(Title VII\) \(EEOC\)](#)
3. The Founder is responsible to ensure all recruitment, selection and hiring protocols are implemented according to Jones Wellness Center’s established practices.
4. Employees who believe Jones Wellness Center is in violation of labor /employment laws are to file a formal grievance with the Founder. (If they believe the violation was made by the Founder, they may contact their immediate supervisor or the owner.)
5. Jones Wellness Center’s representative has 3 business days to address the grievance.
6. The employee is provided with a written response to the grievance.
7. If the employee is not satisfied, he/she may contact the EEOC or the local DSHS/Professional Licensing Office. <https://www.txdirectory.com/online/abc/detail.php?id=153>
8. Employees are oriented to Jones Wellness Center’s Human Resources policies and procedures during the orientation.
9. A summary of the Human Resource policies and procedures are included in the Employee Handbook.

## **Legal Responsibility: Mandatory Employee Testing**

### **PURPOSE:**

To assist Jones Wellness Center to be in compliance with all legal and regulatory requirements.

### **RESPONSIBILITY:**

It is the responsibility of the Leadership Team to ensure all legal and regulatory requirements are acquired and met by Jones Wellness Center and agency staff.

### **POLICY:**

Jones Wellness Center is committed to ensure that staff are competent to serve clients. Jones Wellness Center requires mandatory testing for illicit substance use and tuberculosis.

### **PROCEDURE:**

1. It is the responsibility of the Founder to ensure all staff and volunteers undergo mandatory employee testing.
2. Jones Wellness Center requires mandatory employee testing for tuberculosis and illicit substances.
3. Health and Tuberculosis screen:
  - a. The result of the screen is kept with the employee file.
4. Alcohol and Drug Testing: Jones Wellness Center has a drug-free workplace policy which requires all staff to acquire a pre-employment urinalysis for drugs. Staff may be re-tested randomly and upon suspicion.
5. Employees are oriented to Jones Wellness Center's Human Resources policies regarding mandatory testing and procedures during the orientation.
6. A summary of the Human Resource policies and procedures on mandatory testing are included in the Employee Handbook.

## **Legal Responsibility: Investigations and Other Legal Actions**

### **PURPOSE:**

To assist Jones Wellness Center to be in compliance with all legal and regulatory requirements.

### **RESPONSIBILITY:**

It is the responsibility of the Leadership Team to ensure all legal and regulatory requirements are acquired and met by Jones Wellness Center and agency staff.

### **POLICY:**

Jones Wellness Center is committed to protecting its personnel when actions of the organization are being put under scrutiny. Personnel are given assistance during any investigative process or legal actions.

### **PROCEDURE:**

1. It is the responsibility of the Founder to inform staff of an investigation pertaining to the organization's activities or other legal actions.
2. Jones Wellness Center maintains professional liability insurance which covers all employees.
3. All staff, except for the Leadership Team, are to refer all financial and legal inquiries to the Leadership Team.
4. Staff are to cooperate with the investigative authorities within the scope of their responsibilities.
5. Staff who request legal counsel for their own defense or Jones Wellness Center's defense will be referred to the Founder.
6. The Founder is responsible for determining if legal counsel is necessary and if determined beneficial, arrange for an appointment for the staff with Jones Wellness Center's contracted legal counsel.
7. An employee's right to legal counsel (assistance during an investigation or pertaining to other legal actions) is noted in the Employee Handbook and inclusive in Jones Wellness Center's orientation process.

## Legal Responsibility: Subpoenas / Warrants

### **PURPOSE:**

To assist Jones Wellness Center to be in compliance with all legal and regulatory requirements.

### **RESPONSIBILITY:**

It is the responsibility of the Leadership Team to ensure all legal and regulatory requirements are acquired and met by Jones Wellness Center and agency staff.

### **POLICY:**

It is the policy of Jones Wellness Center to respond to a subpoena immediately. Subpoenas are requests to appear at a legal or administrative proceeding. Subpoenas Duces Tecum is a request to produce documents for a proceeding. A Subpoena is not a Court Order.

### **PROCEDURE:**

1. All legal documents will be received by the Founder. This procedure addresses the following specific areas:
  - a. Subpoenas for medical records/charts
  - b. Subpoenas for employees
  - c. Subpoenas, notices and warrants for patients
  - d. Processing of court documents in medical records
2. Subpoenas for Medical Records
  - a. The Founder will receive all subpoenas and document the receipt on a log.
  - b. The Founder verifies if there is a medical record number for the individual listed on the document.
  - c. If there is no medical record number for this individual, the Founder notifies by phone the attorney or court representative listed on the document by phone that we have no record of this individual.
    - i. The document can be destroyed.
  - d. If there is a medical record number corresponding to this individual, the Founder notifies the attorney or court representative that we have received the subpoena but are unable to acknowledge whether this individual has any association with the facility.
    - i. To disclose information, federal regulations require a valid signed release or a signed court order. This is followed up in writing.
  - e. If a valid signed release or court order is presented, the information requested from the medical record can be copied, stamped with the disclosure statement and, whenever possible, hand delivered as indicated by the release or order.
    - i. An invoice for the reasonable cost of processing these copies is to be forwarded to the attorney requesting the information.
    - ii. Unless specifically requested in writing on the release or order, HIV information will be excluded from the copies.
    - iii. The court order, release, copies of letters, etc. are to be placed in the miscellaneous section of the patient's chart.
3. Subpoenas for Employees
  - a. When subpoenas for employees are received by the Founder, he/she will inform the employee's supervisor and the Founder that the subpoena was received.
    - i. The supervisor/designee will inform the employee of the date and time of the court appearance, etc., for scheduling and preparation.
    - ii. If the employee receives the subpoena, the employee notifies his/her supervisor who, in turn, contacts the Founder and forwards the document.
  - b. The employee and employee's supervisor informs the Founder of the circumstances related to the issuance of the subpoena (if they are aware of this information).

- c. The Founder calls the attorney listed on subpoena to obtain the reason for the subpoena and what information the attorney needs. The Founder works with an attorney on the possibility of releasing the employee from testifying.
  - i. Some alternatives include substituting a member of the staff; a signed letter from Jones Wellness Center providing the information required (if release is available); deposition by phone; adjusting time/date of testimony, if necessary, etc.
- d. Resolution, if any, is conveyed to the employee's supervisor and Founder and processed accordingly.
  - i. Unless released, an employee must respond to a subpoena or could be held in contempt.
  - ii. When appropriate, patient-Licensed Psychotherapist "privilege" may be invoked by the Licensed Psychotherapist on behalf of the patient.

4. Subpoenas/Notices and Warrants for Patients

- a. The Sheriff's Office will call the Founder to identify that a subpoena needs to be served and the nature of the subpoena.
  - i. All patients in our system sign a "Consent for Treatment" form that acknowledges that this facility will work with officers of the court unless specifically revoked in writing by the patient.
- b. If we have no record of the individual or if the patient is not active, the Sheriff's Office is notified that the patient is not in our system and no further information is provided.
- c. If the patient is in the system, the Founder will notify the Medical Director that the Sheriff's Office needs to serve a subpoena.
  - i. The Founder will confirm the location of the patient and begin to prepare the patient for receipt of notice.
  - ii. The Founder will call the Sheriff's Office and confirm the location of the patient.
- d. The Founder will have the patient sign two copies of a release of information.
  - i. The Sheriff's Office representative will take the document to the Founder and be handed one of the signed forms.
  - ii. The second signed form is placed in the patient's record.
  - iii. The Founder, in conjunction with the Licensed Psychotherapist as necessary, serves the document to the patient the same day it is received.
  - iv. In the absence of the Founder, the Medical Director will be responsible for receiving and serving the document.
- e. If an officer of the court presents himself/herself at the facility with a warrant for an individual, a similar process occurs.
  - i. The officer is referred to as the Founder, who contacts the Medical Director to confirm the location of the patient and find time for patient preparation.
  - ii. Then the Founder provides the officer with the location of the patient.
  - iii. If the patient is not in the system or we have no record of the individual, this information is given to the officer with no further disclosure.

5. Processing of Court Documents in Medical Records.

- a. All court documents will be received by the Founder. The number of documents will be counted and logged by category and placed in the patient record.
- b. Subpoenas will be served upon the Founder.
- c. When served, the Founder will ensure the subpoena is for Jones Wellness Center.
- d. If a photocopy of the subpoena is received directly, an original must be shown.
- e. A subpoena received by mail must be sealed and signed. If it is a copy, the signature of the court will be sufficient.
- f. Twenty-four (24) hours' notice is required for personal appearance or production of records.
  - i. Ensure the "due date" is twenty-four (24) hours from the date of receipt.
  - ii. If not, call the attorney and notify him or her of such.
- g. **NOTE:** Drug and alcohol abuse records are considered confidential and privileged information.
  - i. Records containing such information require patient consent or court order.

6. An attorney that must have a special authorization signed:

- a. Special authorization must be signed when the defendant's attorney has issued the subpoena, and the plaintiff is the patient. (If the plaintiff is the patient and the plaintiff's attorney has issued the subpoena, the patient must also sign an authorization for release).
- b. Drug and alcohol abuse records are considered confidential and privileged information.
  - i. Records containing such information require patient consent or court order.
- c. When records contain information from other providers, i.e. families, friends, or when the record refers to another patient by name, these parts of the record will be deleted from the record.

7. If a special authorization is required and the attorney cannot get one signed, a court order will be sufficient.
8. If there is a problem with the subpoena prohibiting disclosure, Jones Wellness Center's legal department is to advise the requesting party of the problem.
  - a. A court order or the patient's consent may be requested.
9. If a subpoena is requesting personal appearance, the requesting party will be contacted to clarify whether copies of the record can be mailed.
10. Notify the physician who treated the patient that a subpoena has been received.
11. If all attempts to locate a record fail, type a "NO RECORD STATEMENT" form.
  - a. Mail the statement and subpoena to one of the following:
    - i. If the Subpoena that was due in court, send the statement to the attorney's office.
    - ii. If the subpoena came directly from the attorney's office, send it back to the attorney.
  - b. Do not return fees received. If a partial fee was paid, do not bill for the remainder of fee.
12. Document on the correspondence card, under date mailed, "NO RECORD" and the date the statement was mailed.
13. Log: The Founder documents all requests for information, subpoenas and court orders on the Request for Medical Records/Subpoena Log.
  - a. The log is maintained continuously for the annual year, reviewed as part of the risk management activities.
  - b. Logs are scanned onto Jones Wellness Center's server and saved for a period of 7 years in the folder Titled: Request for Information.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.01.03</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Annual Operating Budget</b>

**POLICY:**

1. It is the policy of Jones Wellness Center to have a written budget/proforma to enable Jones Wellness Center to measure the forecast of revenues and expenditures against the actual financial operation of the business.
2. Input from stakeholders is utilized throughout the year to consider adjustments to an existing budget as well as for the development of the annual operating budget.
3. A monthly review of the budget is completed and compared to historical data.
4. The owner has the sole responsibility to ensure adequate cash flow to support the operation of the facility.
5. The owner has the sole discretion to disclose the revenue, and an independent accountant and bookkeeper is utilized for all accounting purposes.

**PROCEDURE:**

1. Jones Wellness Center utilizes QuickBooks for accounting software.
2. The owner and his accountant have access to the actual revenue and expenditures.
3. Annually, prior to Jones Wellness Center's fiscal year (January 1-December 31) the owner, with the assistance of an accountant and bookkeeper, develops a budget in the approved format.
4. The approved budget indicating expenditures is signed and dated by the owner.
5. Input into the budgeting process is provided by the Leadership Team and additional staff informally via ongoing conversations with staff.
6. The budget is reviewed monthly by the bookkeeper and owner to compare and measure the forecast of expenditures to actual costs.
7. The Leadership Team reviews the actual expenditures to forecasted expenditures on a quarterly basis.
8. The review is documented in the LT meetings.
9. Adjustments are made to the budget at the discretion of the owner.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.01.05</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Management of Programs and Services</b>

**POLICY**

1. It is the policy of Jones Wellness Center to manage its programs and services.
2. Programs or services providing care are directed by one or more qualified professionals or by a qualified licensed independent practitioner with clinical responsibilities.
3. Below are the responsibilities of those with administrative and clinical direction of its programs or services.

**PROCEDURE**

1. Jones Wellness Center has the Founder to manage all programs operated at the center.
2. Jones Wellness Center's Founder has experience and education to meet the needs of the population.
3. Jones Wellness Center divides the services into clinical and operational responsibilities with specific job descriptions for each.
4. The job descriptions for each position are established and maintained in the HR files.
5. Employees are evaluated on their performance annually and held accountable.
6. Weekly Meetings are held to coordinate care, treatment, or services among the organization's programs.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD 04.01.07</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Leadership Approved Guideline and Standards of Treatment</b>

## **POLICY**

It is the policy of Jones Wellness Center to maintain a manual of written approved guidelines and standards that describe how the service delivery process is defined, organized and carried out. The policies and procedures are inclusive of all licensable services provided by Jones Wellness Center.

## **PROCEDURE**

It is the policy of Jones Wellness Center to maintain a manual of written approved guidelines and standards that describe how the service delivery process is defined, organized and carried out. The policies and procedures are inclusive of all licensable services provided by Jones Wellness Center.

### **PROCEDURE:**

1. The Founder shall assure for the development, maintenance and distribution and compliance of the policy and procedure manual and its policies.
2. All policies shall be approved through the Leadership Team committee.
3. The manual shall be reviewed and approved annually. The first page of the manual shall be a signed statement by the Founder documenting approval and the date of approval.
4. All policy approvals or modifications shall be documented in the performance improvement/quality assurance meeting minutes and approved by the Founder prior to implementation.
5. Procedures and forms may be modified without modification of policy. If this activity is undertaken, the Founder shall assure us that these modifications are approved by the PI/QA committee.
6. The Founder shall maintain the master copy of the manual, electronically and a hard copy. The hard copies are maintained in the Founder's office for reference.
7. The Founder shall ensure that all modification additions or deletions are communicated to all staff members who maintain a copy of the manual.
8. The policy and procedures are inclusive of state and accreditation standards.
9. The Performance Improvement Plan includes the goals and scope of services offered.
10. Each licensed facility gives access to the policy and procedure manual to all staff in an electronic file.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.02.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Conflicts of Interest</b>

## POLICY

1. The Leadership Team addresses any conflicts of interest involving staff that affects or has the potential to affect the safety and quality of care, treatment, or services.
2. It is the policy of Jones Wellness Center to refrain from and avoid conflicts of interest, or the appearance of conflicts, between the private interests of any employees and independent contractors (hereinafter referred to as "individuals") and his or her official responsibilities and duties performed on behalf of the organization(s).
3. Dealing with customers or potential customers
  - a. Individuals should not provide or give cash or non-cash gifts to others which might appear to improperly influence others in their relations with Jones Wellness Center except for gifts of a nominal value (generally less than \$10.00).
  - b. Individuals should not accept direct gifts from actual or potential customers.
4. Dealing with suppliers or potential suppliers of goods or services (including professionals):
  - a. Individuals should not accept gifts from current or potential suppliers of goods or services.
  - b. This does not preclude the acceptance of modest gifts or entertainment of nominal value (generally less than \$10.00).
  - c. If an individual has doubt as to the appropriateness of a gift, the individual should seek the advice of his or her supervisor or the Founder.
5. Dealing with actual or potential referral sources, i.e., physicians, hospital social workers and/or discharge planners, case managers, etc.:
  - a. Cash or non-cash gifts to actual or potential referral sources are inappropriate under any circumstances, except for nominal gifts which are provided to everyone of a particular class (i.e., all hospitals, all general practitioners) within your market area.
6. Dealing with financial interest in or control of a customer, supplier, or referral source:
  - a. Individuals or their immediate family members who have financial interest in or control (consultant, agent, director, officer, or employee) of a customer, supplier, or referral source shall immediately disclose the same to their immediate supervisor who shall advise the Founder.
  - b. Individuals or their immediate family members shall not receive any financial gain or benefit from any customer, supplier, or referral source that has direct or indirect dealings with Jones Wellness Center or any of their affiliates.
  - c. This disclosure does not apply to an investment in a publicly traded company, which is less than five percent (5%) of the company's value.
7. Individuals must avoid any situation in which the individual has an interest in any entity or matter that may influence or cloud the individual's judgment in the discharge of his or her responsibilities.
  - a. Individuals owe Jones Wellness Center a duty of loyalty, to work in their best interests.
  - b. Individuals may not solicit, contact or approach any of Jones Wellness Center's actual or prospective clients, referral sources, employees, vendors or independent contractors to cause them to cease doing business with such company.
8. Individual Responsibilities
  - a. Individuals involved in the negotiation of contracts with Jones Wellness Center shall ensure that all statements, communications and representations are accurate, complete and truthful and comply with applicable laws and regulations.
  - b. Individuals shall have the responsibility to protect the organization(s) from violating Federal and State anti-kickback laws.
    - i. They shall ensure that all dealings with providers or products or services do not result in our organization(s) or any individuals receiving cash or goods or services at less than fair market value in exchange for the ability to provide their products or services to the Companies or their clients.

## **DISCUSSION**

1. Jones Wellness Center are valuable customers to suppliers of goods, providers of services and professional consultants.
  - a. Those who wish to do business with Jones Wellness Center must understand that all purchases by the organizations will be made exclusively based on price, quality, service, and suitability to the organization's needs.
  - b. Purchase of goods or services must not lead to individuals or their families receiving personal benefits of any kind, whether direct or indirect.
2. Gifts or entertainment involving customers and suppliers can be misunderstood even if exchanged out of innocent motives.
  - a. Such practices can appear to be attempts to influence our employees into directing business to a particular supplier.
  - b. To avoid even the appearance of improper relations with suppliers or potential suppliers, the following standards shall apply to the receipt of gifts and entertainment by individuals or immediate family members:
    - i. Gifts or other benefits:
      1. Individuals are prohibited from soliciting gifts, gratuities, or any other personal benefits or favor of any kind from suppliers or potential suppliers.
      2. Individuals are prohibited from accepting gifts of money or property which have significant monetary value (e.g., airline tickets).
      3. Individuals may accept unsolicited non-money gifts provided such gifts have a market value of under \$10.00 per occurrence and not more than six times a year.
    - ii. Any gifts of more than nominal value must be reported to your supervisor to determine whether it can be accepted.
      1. Some gifts may be perishable to make their return impractical.
      2. Supervisors will require that such gifts be returned or donated to charitable or other nonprofit organizations.
      3. Supervisors should also require individuals to inform givers that acceptance of such gifts is prohibited, and documentation of that disposition should be made in the individual's personnel file.
3. Entertainment and Vendor Sponsored Events:
  - a. Individuals shall not encourage or solicit any entertainment from any individual or company with whom Jones Wellness Center does business.
  - b. Entertainment includes, but is not limited to, activities such as dinner parties, theater parties, and sporting events, luncheons, trade shows, educational seminars, or similar events.

## **CONFLICTS OF INTEREST**

1. From time-to-time individuals may accept unsolicited entertainment but only under the following conditions:
  - a. The entertainment occurs infrequently
  - b. It arises out of the ordinary course of business
  - c. It involves reasonable and not lavish expenditures
  - d. The entertainment takes place in settings that are reasonable, appropriate, and fitting to individuals affiliated with the Companies, their hosts, and the business at hand
2. Dealings with potential, current or past clients, referral sources and other potential or current customers:
  - a. Individuals must keep all dealings with clients and referral sources fair and at arm's length.
    - i. Jones Wellness Center earns and retains business because of the quality of their facilities and services.
    - ii. Gifts of cash or other items or services of more than \$10.00 are not permitted.
  - b. Any entertainment of such individuals must be infrequently consistent with all applicable ethical standards and / or reasonable value so as not to be misconstrued as intended to influence the judgment of such individuals.

- c. While a Licensed Psychotherapist is employed at a Jones Wellness Center, they are not allowed to engage in any type of outside professional/therapeutic and/or social relationship with a client after the client has been discharged from the Company.
- d. While employed at Jones Wellness Center, employees are not allowed to attend any self-help groups or meetings on premises.
- e. While employed at Jones Wellness Center, employees who are not facilitating a group are not allowed to sit in for observation unless approved by the Founder, this includes aftercare groups.
- f. Violations of the Conflict-of-Interest Policy may result in disciplinary action up to and including termination.

### UTILIZATION REVIEW

No internal or external reviewer shall be permitted to review the admission or continued stay of a client in which they have a financial interest or from whom some other benefit may be realized. All Jones Wellness Center employees or contracted personnel shall be required to comply with the conflict-of-interest standard that forbids them to deliberate on any issue of admission or continued stay which they have a financial or other personal investment or interest.

Questions on this policy should be directed to Founder.

### **PROCEDURE**

1. Corporate Enforcement
  - a. It is the responsibility of the Founder to ensure:
    - i. Those programs exist to educate all individuals regarding this Conflict-of-Interest Statement.
    - ii. Those programs exist to audit the practices and interpretations with respect to this Conflict-of-Interest Statement.
  - b. Individuals have a duty and responsibility to report any actual or perceived conflicts of interest to their supervisor or the Founder.
    - i. It is essential that all such matters be brought to the attention of those who can properly assess the conflict and determine how to proceed.
  - c. Failure to comply with this policy may result in disciplinary action, up to and including termination.
  - d. Upon hire, employees are provided with the “Disclosure Statement on Conflicts of Interest Policy”:
    - i. The “Statement” is to be signed and dated with a copy given to the employee and a copy in the HR file.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.02.03</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Ethical Principles</b>

## POLICY

The purpose of this policy is to define an Ethical Framework for Jones Wellness Center.

### POLICY:

1. It is the policy of Jones Wellness Center that the owner of Jones Wellness Center is committed to full compliance with professional and business ethics.
  - a. All members of the treatment staff are expected to deliver care in accordance with the ethics of their chosen professions.
  - b. Moreover, the business practices of Jones Wellness Center must also be above reproach.
  - c. For this reason, Jones Wellness Center establishes formal business ethical guidelines, as outlined below.
2. It is the responsibility of the Leadership Team and/or designee to implement this policy and procedure.
  - a. It is the responsibility of the Founder to disseminate this information to employees under their direction.

### PROCEDURE:

1. Written Ethical Codes of Conduct
  - a. Business Activities
    - i. All clients and/or families and guardians will be fully informed of the cost of Jones Wellness Center services at the time of admission.
    - ii. Clients will only be billed for services rendered.
    - iii. Jones Wellness Center will not advertise services that it cannot professionally render in accordance with the law and professional standards of practice.
    - iv. Jones Wellness Center will not provide financial incentives to referral or other sources that pose a conflict of interest.
    - v. Jones Wellness Center will acknowledge its affiliations with other providers to prospective clients.
    - vi. Jones Wellness Center will not exploit or require clients to make public statements expressing gratitude to the program.
    - vii. Jones Wellness Center will not discharge a client solely because of an inability to pay.
    - viii. Jones Wellness Center will not make any payments or offer any type of benefits to clients or prospective clients, or any persons or entities in a position to refer clients, as an inducement for them to purchase, arrange for or recommend the Jones Wellness Center's services or to refer business to the company.
    - ix. Jones Wellness Center will make financial arrangements for treatment prior to or at the time of admission.
      1. All those assuming responsibility for payment will acknowledge the arrangements.
      2. If payment changes occur during care, the client, family, or others will be immediately notified and assisted in making alternate arrangements.
      3. During this period, the client will continue to receive the same level and intensity of care.
  - b. Marketing:
    - i. Jones Wellness Center will be conducted in an ethical manner related to marketing and admissions.
      1. Brochures, literature and other program information will only contain information on actual programs that exist and that are available and operational.
      2. Individuals will not be admitted to programs in which they do not meet criteria or that are not appropriate for their needs.
  - c. Contractual Relationships:

- i. Jones Wellness Center will acknowledge its affiliations with other providers to prospective clients.
- ii. Jones Wellness Center will have organizational and staff relationships to other health care providers, educational institutions, and payers.
- iii. Jones Wellness Center will review relationships with other health care providers, educational institutions, and payers on an annual basis to ensure that the organization's mission is to the individuals and community not harmed by any contractual relationships, which may be cause for a potential conflict of interest.
- d. Service Delivery
  - i. Prevention/Conflict of Interest:
    - 1. Jones Wellness Center actively works to prevent and effectively intervene early in potential conflicts of interest by:
      - a. Inclusion of a range of employees and leadership representatives in its Leadership Team
      - b. Provision of mechanisms and procedures to review potential conflicts of interest from a variety of perspectives (e.g., ethics review)
      - c. Careful development and design of related policies which support comprehensive review of situations where important differences of opinion may occur (e.g., financial and clinical)
      - d. Strong support for client, family, and employee rights which clearly indicate procedures for filing grievances, complaints, and rising issues of dissatisfaction or ethical concern
      - e. Strong reliance on the importance of values, mission, and vision to guide decision making of the company, which supports providing the highest quality clinical care
  - ii. Exchange of Gifts, Money or Gratuities
    - 1. Jones Wellness Center staff will not exchange gifts, money or gratuities, including items from patients, visitors or from vendors with whom Jones Wellness Center conducts business.
      - a. Whenever such gifts are offered, employees must decline acceptance.
      - b. Any offer of a gift or gratuity should also be reported to the immediate supervisor.
      - c. Accepting gifts will result in disciplinary action up to and including termination.
      - d. Exceptions to this policy may be granted to the Leadership Team.
  - iii. Personal Fundraising.
    - 1. Jones Wellness Center staff are prohibited from soliciting funds on behalf of a personal cause, i.e. requesting contributions or donations for any agency or charity, school fundraising, etc.
    - 2. Exceptions are limited to personal tragedy or loss of fellow employees as authorized by the Leadership Team.
  - iv. Personal Property:
    - 1. Jones Wellness Center staff is to respect the personal property of the persons served, visitors, and personnel and property owned by the organization.
  - v. Personal Boundaries:
    - 1. Jones Wellness Center staff shall always maintain professional boundaries with the population served and other personnel.
    - 2. Staff are prohibited from engaging in social/sexual, financial, or business relationships with co-workers or clients.
  - vi. Witnessing of Documents:
    - 1. Jones Wellness Center staff are limited to witnessing documents pertaining to legal correspondence pertaining to probation and assignment of benefits for insurance payments.
    - 2. Documents may only be witnessed by Jones Wellness Center staff who are certified as notary public. Exceptions must be discussed with members of the Leadership Team and documented in the clinical record of the person served.

- e. Professional Responsibilities.
  - i. Professional staff, i.e. staff that are licensed, registered or credentialed, must adhere to the ethical standards of their profession.
- f. Human Resources:
  - i. Instances of perceived and actual conflict of interest, management, and leadership may elect any of the following options and combinations of options to guide decision-making.
  - ii. These include:
    - 1. To eliminate themselves from active decision making in conflict of interest
    - 2. To request a review of the situation by the Leadership Team without the member experiencing the conflict present
    - 3. To route the concern to another committee or group within Jones Wellness Center for help in decision making (e.g., Ethical Committee)
    - 4. To suggest and request corporate legal review
- g. Prohibition of Waste, Fraud, Abuse or Other Wrongdoing:
  - i. Jones Wellness Center employees will not knowingly engage in waste or fraud or other wrongdoing.
  - ii. Employees who are legally charged with fraud, abuse or any wrongdoing must notify their immediate supervisor immediately.

2. Written Procedures to Address Allegations of Violations of Ethical Codes

- a. Non-Reprisal for Personnel Reporting
  - i. Jones Wellness Center staff will not be subject to reprisal for reporting concerns or suspicions of ethical violations.
  - ii. Staff are to report concerns or suspicions of ethical violation to the immediate supervisor or if a conflict is perceived, the Founder.
  - iii. All allegations of violation of the ethical code are to be referred to the Leadership Team.

3. Timeframes

- a. Reported ethical violations are to be reviewed by the Leadership Team within 5 business days.
- b. The Leadership Team is to review the allegation and determine a decision on the reported allegation within 10 business days of report.
- c. Staff who are determined to be in violation of Jones Wellness Center's ethical policies are subject to disciplinary action in accordance with established protocols, and/or termination.

### **Clinical Based Treatment**

#### **PURPOSE**

The purpose of this policy is to define and make explicit the relationship between governance and organizational Management.

#### **RESPONSIBILITY**

It is the responsibility of the Founder and/or designee to implement this policy and procedure. It is the responsibility of the Founder to disseminate this information to employees under his/her direction.

#### **POLICY**

- 1. It is the policy of Jones Wellness Center that care, treatment or services are provided based on the needs of the individuals served, regardless of compensation or financial risk-sharing with those who work in the organization, including staff.
- 2. Jones Wellness Center is a for-profit behavioral health program.
  - a. Individuals must be able to afford the services provided.

- 
- b. A financial assessment is completed prior to admission of an individual to Jones Wellness Center's services.

## **PROCEDURE**

1. Jones Wellness Center is a for-profit behavioral health program:
  - a. A financial assessment is completed prior to admission to Jones Wellness Center's services to ensure the individual meets the financial criteria for admission.
2. If during treatment an individual is no longer able to afford Jones Wellness Center's services or their insurance is discontinued, a clinical staffing will be held to discuss treatment needs of the individual.
3. Treatment options, including a scholarship for the remainder of services are discussed.
4. If a scholarship is not available, the Founder will assist the client in finding a treatment option to meet their needs.

## **Staff Termination Without Clinical Impact**

### **PURPOSE**

The purpose of this policy is to define and make explicit the relationship between governance and organizational management.

### **RESPONSIBILITY**

It is the responsibility of the Founder and/or designee to implement this policy and procedure. It is the responsibility of the Founder to disseminate this information to employees under his/her direction.

### **POLICY**

It is the policy of Jones Wellness Center to ensure when staff are excused from a job responsibility, care, treatment, or services are not affected in a negative way.

### **PROCEDURE**

1. Supervisors are responsible for ensuring the staffing levels of their facility are maintained in accordance with Jones Wellness Center's established protocols.
2. If an individual staff member is relieved of their duties, it is the Founder's responsibility to ensure the individual's duties are immediately covered.
3. The Founder is responsible for submitting a Personnel Action Form (PAF) to terminate the specific employee.
4. To replace the staff who separated from Jones Wellness Center, the Founder is responsible to submit a Requisition Form to document the need and permission to fill the vacant position on the organizational chart.
5. Once approved, the Founder will begin the recruitment, selection and hiring process.

## **Client Acknowledgement Regarding Charges**

### **PURPOSE**

The purpose of this policy is to define and make explicit the relationship between governance and organizational management.

### **RESPONSIBILITY**

It is the responsibility of the Founder and/or designee to implement this policy and procedure. It is the responsibility of the Founder to disseminate this information to employees under his/her direction.

### **POLICY**

Individuals served receive information about charges for which they will be responsible.

### **PROCEDURE**

1. Prior to and during the client orientation, individuals presenting for services are provided information regarding the cost of services and charges for which they will be responsible.
2. Upon admission, they completed the consent for services which outlines the cost of services and list additional charges in which they may occur.
3. The consent for services is maintained in the Electronic Medical Record.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.02.05</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Review Results in Denial of Care</b>

**POLICY**

1. It is the policy of Jones Wellness Center that when an internal or external review results in the denial of care, treatment, or services, or payment, the organization makes decisions regarding the ongoing provision of care, treatment or services and discharge or transfer, based on the assessed needs of the individual served.
2. It is the policy of Jones Wellness Center to provide services based on clinical necessity.

**PROCEDURE**

1. Once an individual is admitted to treatment, Jones Wellness Center is committed to providing treatment services based on clinical necessity.
2. An internal or external review that results in the determination that payment will not be made through an insurance company is to be noted in the clinical record and Jones Wellness Center's billing department is to be made aware.
3. A tentative discharge date is based on the client's assessed clinical needs and documented in the file.
4. If a need for continuity of care is assessed, the individual may be referred to a treatment program in their local area for the additional care needs.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.03.01</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Services That Meet the Needs of Clients</b>

**POLICY**

It is the policy of Jones Wellness Center to provide individualized treatment to individuals based on their assessed and perceived needs.

**PROCEDURE**

1. Jones Wellness Center has a multidisciplinary treatment team, comprised of Medical Director, Advanced Practical Nurse, Licensed Psychotherapist, Registered Dietician, and the Founder.
2. Upon admission to Jones Wellness Center, individuals undergo a biopsychosocial evaluation to assist the clinical staff to recommend therapeutic interventions to meet the individual's needs.
3. An individualized treatment plan is developed based on the assessment and the individual's perception of his/her needs.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.03.05</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Collaboration for the Provision of Services</b>

**POLICY**

Services are defined through the collaboration of the leaders and external organizations. Jones Wellness Center collaborates with mental health professionals, physicians, dieticians, and acute medical facilities for the provision of care, treatment, and services.

**PROCEDURE**

1. The Leadership Team is responsible to execute Business Associate Agreements, Referral Agreement and Contracts for services which exceed Jones Wellness Center's scope of service.
2. Services are identified through individual assessment.
3. Unless there is a Business Associate Contract in place, a Release of Information (ROI) is required to access the community-based services.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.03.07</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Comparable Services</b>

**POLICY**

It is the policy of Jones Wellness Center to provide the same standard of care, treatment, or services throughout the organization for individuals with comparable needs.

**PROCEDURE**

1. The Founder is responsible to ensure that variances in staff, setting, or payment source do not affect outcomes of care, treatment, or services in a negative way.
2. The Founder is responsible for ensuring the care, treatment, or services are consistent with the organization's mission, vision and goals.
3. Perceived disparities between levels of care, programs, or services should be immediately brought to the attention of the Leadership Team.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.03.09</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Credentialing and Assignment of Contractors</b>

## POLICY

1. It is the policy of Jones Wellness Center to ensure care, treatment, or services provided through contractual agreement are provided safely and effectively.
2. Jones Wellness Center has established a “credentialing” process that defines practice parameters, documentation standards, and quality of client care guidelines for all credentialed employees and credentialed and privileged licensed independent practitioners.
3. Adherence to these policies and procedures is considered a condition of clinical staff privileges.
4. Compliance with policies and procedures shall be monitored through the Performance Improvement Committee, utilization management committee, peer review, and reappointment process.

## PROCEDURE

### 1. GRANTING CLINICAL RESPONSIBILITIES TO THE PROFESSIONAL STAFF:

- a. By Leadership Team, individuals receive clinical responsibilities by appointment with the Jones Wellness Center’s Founder who performs the following functions to first ensure each Licensed Independent Practitioner (LIP) has the proper credentials to be granted clinical responsibilities appropriate for their discipline:
  - i. Verifying all licenses and education, including relevant training and experience by the credentialing process
  - ii. Evaluating current competency
  - iii. Evaluating the ability to perform clinical responsibilities
- b. All clinical responsibilities shall be governed by the laws of the State of Texas and shall be subject to the policies and procedures of the organization.
  - i. Additionally, all clinical responsibilities staff shall be accountable for the ethical and professional practices of the organization.
  - ii. As a means of ensuring the quality of clinical practice, the Founder will review all applicants for clinical responsibilities and will make recommendations via the Founder to the Leadership Team regarding the granting of clinical responsibilities.
- c. All clinical responsibilities staff will be reviewed for re-appointment every two years.
- d. For LIP whose position requires clinical responsibilities, the following documents must be submitted to the Founder at the time of signature of a “Licensed Independent Practitioner” contract with Jones Wellness Center to perform an outlined scope of practice:
  - i. Application for Clinical Responsibilities
  - ii. Medical Professional:
    1. Must be a state licensed M.D. or D.O. or ARNP
    2. Must have current DEA license (if applicable)
    3. Must have proof of current liability/malpractice insurance
    4. Two letters of recommendation or equivalent
    5. Must abide by organization and professional organization code of ethics
  - iii. Health Care Professional:
    1. Must be state licensed by discipline
    2. Must have proof of current liability/malpractice insurance
    3. Two letters of recommendation or equivalent
    4. Must abide by organization and professional organization code of ethics

**2. PROFESSIONAL SANCTIONS:**

- a. Information as to whether any of the following have ever been or are in the process of being involuntarily admonition, reprimanded, denied, revoked, suspended, reduced, terminated, not renewed or voluntarily relinquished:
  - i. Staff membership status or clinical responsibilities in any other facility or health care organization
  - ii. Membership/fellowship in local, state or national professional organizations
  - iii. Specialty board certification/eligibility
  - iv. License to practice any profession in any jurisdiction
  - v. Drug enforcement agency or other controlled substance member
  - vi. If any such actions ever occurred or are pending the particulars there are to be included.
- b. Credentialing and privilege file shall be established for each applicant and maintained by Human Resources.
  - i. The Founder, after receiving and reviewing the credentialing file shall submit the name of the nominee to the Leadership Team.
    1. The Leadership Team will then approve the clinical responsibilities and reflect such in their minutes.
  - ii. All documentation of reviews of LIP shall be maintained in their clinical responsibilities file.
    1. The Founder shall maintain a record of professional standards and/or requirements as established by national and/or state professional organizations appropriate to the clinical/medical staff.
    2. The PIC committee shall determine that all delegated responsibilities follow all applicable federal, state, and local regulations.
  - iii. The organization shall have an effective mechanism to educate the medical staff and other organization's staff about illness and impairment recognition issues specific to the medical staff.
    1. Special emphasis is placed on the confidentiality of all matters related to any type of mental illness and impairment of the medical staff.
    2. The facility will have a process that evaluates the credibility of a complaint, allegation or concern.
  - iv. All contracted staff shall have in their contract with Jones Wellness Center parameters for complying with performance expectations as defined in delineated responsibilities and/or in job description and shall follow The Joint Commission standards.

<b>TITLE: LEADERSHIP</b>	<b>REFERENCE: LD.04.04.03</b>
<b>REVIEW AND APPROVAL:</b> <b>09/10/2024</b>	<b>SUBJECT: Defining Services and Processes</b>

**POLICY**

It is the policy of Jones Wellness Center to establish a leadership structure that identifies those responsible for the provision of care, treatment and services.

**PROCEDURE**

1. Jones Wellness Center utilizes a modified Strategic Planning Process to modify or implement new services.
2. The modified process includes:
  - a. Review of data
  3. Performance review
  4. Utilization review, geographic data, epidemiology data
  5. Incident/Grievance reports
  6. Client satisfaction
  7. Staff satisfaction
    - a. Suggestions
    - b. Identification of issue or service needed - goal to achieve
    - c. Evaluation of resources, i.e. financial, human resource, material
    - d. Action plan