

# SUBSTANCE ABUSE-OUTPATIENT SERVICE STANDARD

Bergen-Passaic Transitional Grant Area

Grant Year: 2020/21



PATERSON-PASSAIC COUNTY-BERGEN COUNTY  
HIV HEALTH SERVICES PLANNING COUNCIL

## Service Category Definition – Substance Abuse-Outpatient

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(HIV/AIDS Bureau Policy Clarification Notice #16-02, Revised 10/22/2018)

Substance Abuse Outpatient Care is the provision of outpatient services for the treatment of drug or alcohol use disorders.



Key activities include:

- Screening
- Assessment
- Diagnosis, and/or
- Treatment of substance use disorder, including:
  - Pretreatment/recovery readiness programs
  - Harm reduction
  - Behavioral health counseling associated with substance use disorder
  - Medication assisted therapy
  - Neuro-psychiatric pharmaceuticals
  - Relapse prevention

## Program Guidance

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(HIV/AIDS Bureau Policy Clarification Notice #16-02, Revised 10/22/2018)

Acupuncture therapy may be allowable under this service category only when, as part of a substance use disorder treatment program funded under the HRSA RWHAP, it is included in a documented plan.

Syringe access services are allowable, to the extent that they comport with current appropriations law and applicable HHS guidance, including HRSA- or HAB-specific guidance.



## **Ryan White HIV/AIDS Program Eligibility Requirements**

(HIV/AIDS Bureau Policy Clarification Notice #13-02, Revised 5/1/2019)



Person(s) seeking services in the Ryan White HIV/AIDS Program (RWHAP) must meet the following requirements for eligibility:

- Any person(s) with an HIV diagnosis or their legal guardian who lives in the City of Paterson, Passaic County, and/or Bergen County, New Jersey; **OR**
- A person designated as the individual's medical power of attorney (i.e., their court appointed representative or legal representative). *Proper documentation must be collected at initial determination and redetermination to verify guardianship or medical power of attorney. **AND***
- Any individual with a household income that is at or below 500% of the federal poverty level; **AND**
- Any individual who is uninsured or underinsured.



Client eligibility must be certified annually and recertified at least every six months. The primary purpose of the RWHAP eligibility certification process is to ensure that an individual's residency, income, and insurance status continues to meet the Bergen-Passaic transitional grant area (TGA) eligibility requirements and to verify that the RWHAP is the payer of last resort. The eligibility recertification process includes checking for the availability of all other third-party payers. Subrecipients are also required to obtain documentation of CD4 and viral load laboratory results at each eligibility certification and recertification for all clients. Laboratory results must be recent and within 6-months of the eligibility determination date. Subrecipients are required to obtain documentation and maintain the results of the laboratory results in client chart and documented in eCOMPAS.

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**Ryan White HIV/AIDS Program Eligibility Requirements**

(HIV/AIDS Bureau Policy Clarification Notice #13-02, Revised 5/1/2019)

<b>RWHAP Required Documentation Table and Frequency</b>		
<b>Eligibility Requirement</b>	<b>Initial Eligibility Determination &amp; Once a Year/12 Month Period Recertification</b>	<b>Recertification (minimum of every six months)</b>
<b>HIV STATUS</b>	<b>Documentation required at initial eligibility determination.</b>	<b>No documentation required</b> (Proof of HIV status must remain in the client file for the entire time the client is enrolled in RWHAP services.)
	<p>This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• A positive HIV Immunoassay (IA) test result from an initial antibody or combination antigen/antibody (Ag/Ab) test followed by a positive (reactive) HIV-1/2 type-differentiating test (Supplemental IA), qualitative Nucleic Acid Test (NAT)/Nucleic Acid Amplification Test (NAAT), Western Blot or Immunofluorescence Assay (IFA).</li> <li>• A positive qualitative HIV NAT (DNA or RNA) or HIV-1 p24 antigen test.</li> <li>• A detectable (quantitative) HIV viral load (<b><i>undetectable viral load tests are NOT proof of HIV.</i></b>)</li> <li>• An HIV nucleotide sequence (genotype).</li> </ul>	
	<b>Documentation required for once a year/12-month recertification.</b>	
	<p><b>No documentation required</b> (Proof of HIV status must remain in the client file for the entire time the client is enrolled in RWHAP services.)</p>	

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<b>HOUSEHOLD INCOME</b>	<p><b>Proof of household income:</b> This includes income for the client, client’s spouse if legally married, client’s minor child under the age of 18, any person claimed by the client as a dependent on a tax return, and any person that has legal custody or other legal arrangements or guardianship of the client).</p> <p><i>*** Income that is not counted includes grants, scholarships, fellowships, value of SNAP benefits, 401K if not accessed, and any other non-accessible income, such as trust funds.</i></p>	
	<b>Documentation required at initial eligibility determination and for once a year/12-month recertification.</b>	<b>Documentation required at eligibility recertification.</b>
	<p>This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Pay stubs (at least two), <b>OR</b></li> <li>• A signed and dated employer statement on company letterhead may be used. It must state the name of client, rate and frequency of pay, a phone number, and whether the client is currently receiving or is eligible to receive health benefits from the employer, <b>OR</b></li> <li>• IRS 1040 form or IRS W-2 from most recent year; <b>OR</b></li> <li>• IRS W-4 form.</li> </ul>	<p>This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Self-attestation of no change; <b>OR</b></li> <li>• One of the approved documents listed in the <i>Initial Eligibility Determination &amp; Once a Year/12 Month Period Recertification (on the left)</i>.</li> </ul>
	<b>For clients declaring no income.</b>	
	<p>At least one of the following is required:</p> <ul style="list-style-type: none"> <li>• A statement provided as to how the client receives food, clothing, and shelter (also known as a letter of support).</li> <li>• A recent Summary Earnings Query (SEQY) printout, or Work and Gain Economic Self Sufficiency (WAGES) printout or an income tax return from the previous year.</li> <li>• Federal Insurance Contributions Act (FICA) to establish prior work year income.</li> </ul>	

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<b>RESIDENCY</b>	<b>Documentation required at initial eligibility determination and for once a year/12-month recertification.</b>	<b>Documentation required at eligibility recertification.</b>
	<p>This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Current New Jersey or local photo identification (includes NJ driver’s license); <b>OR</b></li> <li>• Utility bill with client name and street address; <b>OR</b></li> <li>• Housing, rental, or mortgage agreement with client’s name and street address; <b>OR</b></li> <li>• Recent school records with client’s name and street address; <b>OR</b></li> <li>• Bank statement with client’s name and street address; <b>OR</b></li> <li>• Letter from person with whom the client resides; <b>OR</b></li> <li>• Property tax receipt or W-2 form for previous year with client’s name and street address; <b>OR</b></li> <li>• Unemployment document with client’s name and street address; <b>OR</b></li> <li>• Current voter registration card with client’s name and street address; <b>OR</b></li> <li>• Official correspondence (postmarked in last three months) with client’s name and street address; <b>OR</b></li> <li>• Prison records (if recently released) with client’s name and street address.</li> </ul>	<p>This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Self-attestation of no change, <b>OR</b></li> <li>• If client has moved, proof of residency is required. One of the approved documents listed in the <i>Initial Eligibility Determination &amp; Once a Year/12 Month Period Recertification (on the left)</i>.</li> </ul>
	<b>For clients declaring homeless status or living in a shelter.</b>	
	<p>At least one of the following is required:</p> <ul style="list-style-type: none"> <li>• A statement from the shelter in which the client resides or visits; <b>OR</b></li> <li>• A written statement of the client describing living circumstances and a physical observation of location of residence by eligibility staff eligibility staff signed and dated by the client and eligibility staff; <b>OR</b></li> <li>• A statement from a social service agency attesting to the homeless status of the client.</li> </ul>	
<b>INSURANCE STATUS</b>	Subrecipient must verify if the client is eligible for or is enrolled in health care coverage programs. Obtain documentation of insurance status maintain status in client chart and documented in eCOMPAS. This includes Medicaid, Medicare, and employer-based health insurance programs.	
	<b>Documentation required at initial eligibility determination and for once a year/12-month recertification.</b>	<b>Documentation required at eligibility recertification.</b>

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	<p><b>Clients with Insurance:</b></p> <ul style="list-style-type: none"> <li>Obtain a copy of the insurance card (front and back) to be maintained in client chart and documented in eCOMPAS.</li> </ul> <p><b>Clients without Insurance:</b></p> <ul style="list-style-type: none"> <li>Document steps taken to ensure insurance is not available; <b>AND</b></li> <li>Document steps taken to screen client for Medicaid benefits; <b>OR</b></li> <li>Documentation of Medicaid denial; <b>OR</b></li> <li>If the client is employed but without insurance, the client will need to provide proof that they have no access to insurance from their employer (Letter from employer; or Personnel handbook that describes benefits).</li> </ul>	<p>This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>Self-attestation of no change; <b>OR</b></li> <li><b>If the client has lost insurance coverage:</b> <ul style="list-style-type: none"> <li>Document steps taken to ensure insurance is not available (e.g. Cobra); <b>AND</b></li> <li>Document steps taken to screen client for Medicaid benefits; <b>OR</b></li> <li>Documentation of Medicaid Denial.</li> </ul> </li> <li><b>If the client has gained insurance coverage</b>, obtain a copy of the insurance card (front and back) to be maintained in client chart and documented in eCOMPAS.</li> </ul>
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<p><b>CD4 / VIRAL LOAD RESULTS</b></p>	<p>Subrecipient must obtain documentation of most recent CD4/Viral Load laboratory results at least every 6-months to be maintained in client chart and documented in eCOMPAS.</p>	
	<p><b>Documentation required at initial eligibility determination and for once a year/12-month recertification.</b></p>	<p><b>Documentation required at eligibility recertification.</b></p>
	<p>This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>Obtain documentation of most recent CD4/Viral Load laboratory results (within 6-months of eligibility certification date).</li> </ul>	<p>This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>Obtain documentation of most recent CD4/Viral Load laboratory results (within 6-months of eligibility recertification date).</li> </ul>
	<p><b>For clients who are newly diagnosed.</b></p> <p>Subrecipient is responsible for:</p> <ul style="list-style-type: none"> <li>Obtaining documentation of CD4/Viral Load laboratory test results within 90 days of initial eligibility determination. Documentation of most recent CD4/Viral Load laboratory results to be maintained in client chart and documented in eCOMPASS.</li> </ul>	



## **Personnel Qualifications**

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(HIV/AIDS Bureau Policy Clarification Notice #13-02, Revised 5/1/2019)

Substance Abuse-Outpatient services will be provided by staff who meet the minimum requirements and qualifications listed in this section.

1. A Bachelor's degree from an accredited college or university; **OR**
2. An Associate degree from an accredited college, with at least two-years of experience working with HIV diagnosed populations, chronic illness populations, or underserved populations; **OR**
3. A high school (HS) diploma or General Education Diploma (GED) with at least four-years of experience working with HIV diagnosed populations, chronic illness populations, or underserved populations

All Substance Abuse-Outpatient staff must complete yearly, a minimum training regimen that includes at least 8 continuing education units (CEU's). If CEU's are not attainable, prior authorization for alternate training sources must be approved by the Recipient prior to enrollment in training. CEU's may include, but are not limited to, the following areas:

1. HIV case management standards; **AND/OR**
2. AIDS Drug Assistance Program requirements; **AND/OR**
3. Health Insurance Premium and Cost Sharing Assistance programs; **AND/OR**
4. HIV disease processes, treatment, testing, legal ramifications to include confidentiality, counseling/referral and prevention, and ethics (Such as Fundamentals of HIV/HCV Counseling and Testing Training); **AND/OR**
5. Cultural competency training; **AND/OR**
6. Medicaid, Medicare, and Marketplace training/updates; **AND/OR**
7. Health education, risk-reduction, and harm reduction; **AND/OR**
8. STI prevention strategies, pre-exposure prophylaxis (PrEP), and post-exposure prophylaxis (PEP); **AND/OR**
9. Access to and knowledge of all RWHAP core and support services in the TGA; **AND/OR**
10. Access to and knowledge of non-RWHAP funded services that ensures that the RWHAP remains the payer of last resort.

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## Quality Management Outcomes and Quality Assurance Measures

(HIV/AIDS Bureau Policy Clarification Notice #15-02, Updated 11/30/2018)

In addition to the system-wide Service Standards applicable to all RWHAP Part A and Minority AIDS Initiative (MAI)-funded subrecipients, the following program specific Service Standards apply to substance abuse-outpatient subrecipients. These Service Standards are an essential component of the Bergen-Passaic Quality Management program to inform the on-going monitoring and evaluation of RWHAP Part A and MAI-funded substance abuse out-patient subrecipients by the City of Paterson Ryan White Grants Division Office (Recipient). Full compliance with these Service Standard is expected for RWHAP Part A funded subrecipients that have contracts with the City of Paterson, Ryan White Grants Division.

HRSA/HAB Performance Measure: HIV Viral Load Suppression (NQF#: 2082)				
Performance Measure/ Description	Numerator	Data Element	Exclusions	Goal
Percentage of clients, regardless of age, with a diagnosis of HIV with a HIV viral load less than 200 copies/ml at last HIV viral load test during the measurement year.	Number of clients in the denominator with a HIV viral load less than 200 copies/ml at last HIV viral load test during the measurement year.	1. Does the client, regardless of age, have a diagnosis of HIV? (Y/N) <ul style="list-style-type: none"> <li>a. If yes, did the client have a substance abuse-outpatient encounter in the measurement year? (Y/N)</li> <li>i. If yes, did the client have a HIV viral load test with a result &lt;200 copies/mL at the last test? (Y/N)</li> </ul>	NONE	90%
	<b>Denominator</b>			
HRSA/HAB Performance Measure: HIV Medical Visit Frequency (NQF#: 2079)				
Performance Measure/ Description	Numerator	Data Element	Exclusions	Goal
Percentage of clients, regardless of age, with a diagnosis of HIV who had at least one medical visit in each 6-month period of the 24-month measurement period	Number of clients who had at least one medical visit in each 6-month period of the 24-month measurement period with a minimum of 60 days between medical visits.	1. Does the client, regardless of age, have a diagnosis of HIV? (Y/N) <ul style="list-style-type: none"> <li>a. If yes, did the client have a substance abuse-outpatient encounter in the measurement year? (Y/N)</li> </ul>	Client(s) who were not enrolled in Substance Abuse-Outpatient for a continuous 24-month	90%



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with a minimum of 60 days between medical visits.	<p><b>Denominator</b></p> <p>Number clients, regardless of age, with a diagnosis of HIV who had at least one-substance abuse-outpatient encounter in the measurement year.</p>	i. If yes, did the client have at least one medical visit in each 6-month period of the 24-month measurement period with a minimum of 60 days between medical visits? (Y/N)	measurement period.	
HRSA/HAB Performance Measure: Gap in HIV Medical Visits (NQF#: 2079)				
Performance Measure/ Description	Numerator	Data Element	Exclusions	Goal
Percentage of clients, regardless of age, with a diagnosis of HIV who did not have a medical visit in the last 6 months of the measurement year.	<p>Number of clients who did not have a medical visit in the last 6 months of the measurement year.</p> <p><b>Denominator</b></p> <p>Number clients, regardless of age, with a diagnosis of HIV who had at least one-substance abuse-outpatient encounter in the measurement year.</p>	<p>1. Does the client, regardless of age, have a diagnosis of HIV? (Y/N)</p> <p>a. If yes, did the client have a substance abuse-outpatient encounter in the measurement year? (Y/N)</p> <p>i. If yes, did the client have at least one medical visit in the last 6 months of the measurement year? (Y/N)</p>	Client(s) who were not enrolled in Substance Abuse-Outpatient for a continuous 12-month measurement period.	90%
HRSA/HAB National Program Monitoring Standards for RWHAP Part A: Section B: Core Services				
Performance Measure/ Description	Numerator	Data Element	Exclusions	Goal
Percentage of subrecipient substance abuse-outpatient staff who met the minimum requirements and qualifications listed in personnel qualification section of the substance abuse-outpatient service standard.	<p>Number of subrecipient staff in the denominator who met the minimum requirements and qualifications listed in personnel qualification section of the substance abuse-outpatient service standard in the measurement year.</p> <p><b>Denominator</b></p>	<p>1. Is the SA staff listed on the Subrecipient budget or budget modification during the measurement year? (Y/N)</p> <p>i. If yes, did A staff meet the minimum qualifications listed in personnel qualification section of the substance</p>	NONE	100%

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	Number of subrecipient staff listed on the RWHAP Part A and MAI budget for the measurement year.	abuse-outpatient service standard? (Y/N)		
<b>HRSA/HAB National Program Monitoring Standards for RWHAP Part A: Section B: Core Services</b>				
<b>Performance Measure/ Description</b>	<b>Numerator</b>	<b>Data Element</b>	<b>Exclusions</b>	<b>Goal</b>
Percentage of clients receiving substance abuse-outpatient services that have a detailed treatment plan that includes the quantity, frequency, and modality of treatment provided.	Number of clients in the denominator with detailed treatment plan that includes quantity, frequency, and modality of treatment provided	1. Does the patient, regardless of age, have a diagnosis of HIV? (Y/N)) <ul style="list-style-type: none"> <li>a. If yes, did the client have a substance abuse-outpatient encounter in the measurement year? (Y/N)                             <ul style="list-style-type: none"> <li>i. If yes, is there a detailed treatment plan documented in client file? (Y/N)</li> <li>ii. If yes, does the documentation include quantity, frequency, and modality of treatment provided? (Y/N)</li> </ul> </li> </ul>	NONE	90%
	<b>Denominator</b>			
<b>HRSA/HAB National Program Monitoring Standards for RWHAP Part A: Section B: Core Services</b>				
<b>Performance Measure/ Description</b>	<b>Numerator</b>	<b>Data Element</b>	<b>Exclusions</b>	<b>Goal</b>
Percentage of clients receiving substance abuse-outpatient services have a detailed treatment plan that includes the date treatment begins and ends.	Number of clients in the denominator with detailed treatment plan that includes the treatment start and end dates	1. Does the client, regardless of age, have a diagnosis of HIV? (Y/N) <ul style="list-style-type: none"> <li>a. If yes, did the client have a substance abuse-outpatient encounter in the measurement year? (Y/N)</li> </ul>	NONE	90%
	<b>Denominator</b>			

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	Number of mental health clients, regardless of age, with a diagnosis of HIV who had at least one substance abuse-outpatient encounter in the measurement year.	<ul style="list-style-type: none"> <li>i. If yes, is there a detailed treatment plan documented in client file? (Y/N)</li> <li>ii. If yes, does the documentation include the dates treatment begins and ends? (Y/N)</li> </ul>		
<b>HRSA/HAB National Program Monitoring Standards for RWHAP Part A: Section B: Core Services</b>				
<b>Performance Measure/ Description</b>	<b>Numerator</b>	<b>Data Element</b>	<b>Exclusions</b>	<b>Goal</b>
Percentage of clients receiving substance abuse-outpatient services have a detailed treatment plan that includes regular monitoring and assessment of client progress	Number of clients in the denominator with detailed treatment plan that includes regular monitoring and assessment of client progress	<ul style="list-style-type: none"> <li>1. Does the client, regardless of age, have a diagnosis of HIV? (Y/N)                             <ul style="list-style-type: none"> <li>a. If yes, did the client have a substance abuse-outpatient encounter in the measurement year? (Y/N)                                     <ul style="list-style-type: none"> <li>i. If yes, is there a detailed treatment plan documented in client file? (Y/N)</li> <li>ii. If yes, does the documentation include regular monitoring and assessment of client progress? (Y/N)</li> </ul> </li> </ul> </li> </ul>	NONE	90%
	<b>Denominator</b>			
	Number of mental health clients, regardless of age, with a diagnosis of HIV who had at least one substance abuse-outpatient encounter in the measurement year.			
<b>HRSA/HAB National Program Monitoring Standards for RWHAP Part A: Section B: Core Services</b>				
<b>Performance Measure/ Description</b>	<b>Numerator</b>	<b>Data Element</b>	<b>Exclusions</b>	<b>Goal</b>
Percentage of clients receiving substance abuse-outpatient services have a detailed treatment plan that includes the signature of the individual providing the service and/or the supervisor as applicable, and the client	Number of clients in the denominator with detailed treatment plan that includes the signatures of the individual providing the service, supervisor (if applicable), and client.	<ul style="list-style-type: none"> <li>1. Does the client, regardless of age, have a diagnosis of HIV? (Y/N)                             <ul style="list-style-type: none"> <li>a. If yes, did the client have a substance abuse-outpatient encounter in the measurement year? (Y/N)</li> </ul> </li> </ul>	NONE	90%
	<b>Denominator</b>			

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	Number of mental health clients, regardless of age, with a diagnosis of HIV who had at least one substance abuse-outpatient encounter in the measurement year.	<ul style="list-style-type: none"> <li>i. If yes, is there a detailed treatment plan documented in client file? (Y/N)</li> <li>ii. If yes, does the documentation include the signatures of the individual providing the service, supervisor (if applicable), and client? (Y/N)</li> </ul>		
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**Bergen-Passaic TGA RWHAP Part A Program Monitoring Standards for Substance Abuse-Outpatient services.**

Performance Measure/ Description	Numerator	Data Element	Exclusions	Goal
Percentage of substance abuse-outpatient clients, regardless of age, with a diagnosis of HIV who had a documented discharge plan after treatment goals are met.	Number of substance abuse-outpatient clients in the denominator with a completed discharge in the measurement year.	<ul style="list-style-type: none"> <li>1. Does the client, regardless of age, have a diagnosis of HIV? (Y/N)                             <ul style="list-style-type: none"> <li>a. If yes, did the client have a substance abuse-outpatient encounter in the measurement year? (Y/N)                                     <ul style="list-style-type: none"> <li>i. If yes, did the client have a completed discharge summary documenting discharge for meeting objectives of the treatment goals in the measurement year? (Y/N)</li> </ul> </li> </ul> </li> </ul>	NONE	90%
	Denominator			

**Bergen-Passaic TGA RWHAP Part A Program Monitoring Standards for Non-Medical Case Management services.**

Performance Measure/ Description	Numerator	Data Element	Exclusions	Goal
Percentage of substance abuse-outpatient clients, regardless of age, with a diagnosis of HIV who had a documented discharge plan after 30 days without client contact.	Number of substance abuse-outpatient clients in the denominator with a documented discharge in the measurement year.	<ul style="list-style-type: none"> <li>1. Does the client, regardless of age, have a diagnosis of HIV? (Y/N)                             <ul style="list-style-type: none"> <li>a. If yes, did the client have a substance abuse-outpatient encounter in the measurement year? (Y/N)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>1. MCM client continues enrollment in services.</li> </ul>	90%
	Denominator			

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		Number of substance abuse-outpatient clients, regardless of age, with a diagnosis of HIV who had at least one substance abuse-outpatient encounter in the measurement year.	i. If yes, did the client have a documented discharge plan after 30 days without client contact? (Y/N)		
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## SUBSTANCE ABUSE-OUTPATIENT SERVICE STANDARD

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### Clients Rights and Responsibilities

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Services will be provided to all eligible RWHAP clients without discrimination on the basis of: HIV status, race, creed, age, sex, gender identity or expression, marital or parental status, sexual orientation, religion, physical or mental status, immigrant status, or any other basis prohibited by law. Subrecipient's providing services are required to have a statement of consumer rights and responsibilities posted and/or accessible to the client. Each Subrecipient will take all necessary actions to ensure that services are provided in accordance with the consumer rights and responsibilities statement and that each consumer understands fully their rights and responsibilities.

### Clients Charts, Privacy, and Confidentiality

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Subrecipient's providing services must comply with the Health Insurance Portability and Accountability Act (HIPAA) provisions and regulations and all federal and state laws concerning confidentiality of consumers Personal Health Information (PHI). Subrecipient's must have a client release of information policy in place and review the release regulations with the client before services are received. A signed copy of the release of information form must be included in the clients' record. Information on all clients receiving Ryan White Part A funded services must be entered in the HRSA sponsored, Bergen-Passaic TGA managed, eCOMPAS database.

### Cultural and Linguistic Competency

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Subrecipient's providing services must adhere to the National Standards on Culturally and Linguistically Appropriate Services. (please see <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=2&lvlid=53> for more information)

### Client Grievance Process

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Each Subrecipient must have a written grievance procedure policy in place which provides for the objective review of client grievances and alleged violations of service standards. Clients will be routinely informed about and assisted in utilizing this procedure and shall not be discriminated against for doing so. A signed copy of the grievance procedure policy form must be included in the clients' record.

### Case Closure Protocol

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Each Subrecipient providing services must have a case closure protocol on file. The reason for case closure must be properly documented in each client's file. If a client chooses to receive services from another provider the Subrecipient must honor the request from the client.