

Summary of Proposed Policy & Procedure Updates

Section 2 – General Administration Policies

2.1 Organizational Structure and Chart

Key Updates

- Requires a formal, current organizational chart reflecting all departments and reporting relationships
- Aligns structure with CCBHC service lines and leadership accountability

Improvement

Provides clearer organizational structure, improves accountability, and ensures alignment with CCBHC operational requirements.

2.2 Conflict of Interest and Ethical Conduct

Key Updates

- Expands applicability to Board, staff, contractors, and agents
- Establishes formal disclosure, review, and documentation requirements
- Defines corrective actions (recusal, etc.)

Improvement

Strengthens ethical oversight, reduces legal risk, and ensures transparent decision-making.

2.3 Gratuities, Gifts, and Ethical Conduct

Key Updates

- Prohibits acceptance or offering of gifts that could influence decisions
- Aligns with federal procurement and ethical standards
- Requires reporting of any exceptions

Improvement

Protects organizational integrity and ensures compliance with funding and procurement requirements.

2.4 Allocation of Staff Time and Operating Expenses

Key Updates

- Establishes formal cost allocation methodology
- Requires documentation to support allocations
- Aligns with GAAP and 2 CFR Part 200

Improvement

Improves financial accuracy, audit readiness, and compliance with federal funding requirements.

2.7 Use of Consultants and Contracted Services

Key Updates

- Requires written contracts with defined scope, deliverables, and compliance terms
- Establishes CEO approval and oversight
- Prohibits conflicts involving Board members

Improvement

Ensures appropriate use of external resources and strengthens fiscal and contractual accountability.

2.8 Non-Discrimination, Equal Opportunity, and Affirmative Action

Key Updates

- Updates protections to reflect current federal and state law
- Establishes reporting, investigation, and anti-retaliation procedures
- Reinforces workplace expectations

Improvement

Enhances legal compliance and supports a safe, inclusive work environment.

2.10 Fire, Severe Weather, and Medical Emergency Procedures

Key Updates

- Establishes detailed emergency response procedures
- Requires drills, training, and incident reporting

Improvement

Improves emergency preparedness and reduces risk to individuals and staff.

2.10.1 Behavioral and Safety Code Response Procedures

Key Updates

- Structured behavioral emergency codes (Dr. Strong / Dr. Steel)
- Requires de-escalation protocols, incident reporting, and debriefing
- Incorporates trauma-informed response expectations

Improvement

Enhances staff response to behavioral crises and improves overall safety management.

2.11 Energy Conservation and Environmental Sustainability

Key Updates

- Establishes standards for energy use and facility operations
- Encourages efficiency and sustainability practices
- Defines staff responsibilities

Improvement

Improves operational efficiency and reduces long-term facility costs.

2.12 Security and Facility Access Procedures

Key Updates

- Defines access control, key management, and after-hours procedures
- Strengthens protection of records, medications, and equipment
- Requires incident reporting and monitoring

Improvement

Enhances facility security and protects confidential information and assets.

2.15 Development, Review, and Evaluation of Annual Goals and Objectives

Key Updates

- Reinforces structured annual planning process
- Requires Board review and approval
- Incorporates data, CQI, and performance monitoring

Improvement

Strengthens strategic planning and improves Board oversight of organizational performance.

2.15.1 Philosophy of Substance Use Treatment and Recovery Services

Key Updates

- Establishes formal, evidence-based treatment philosophy
- Aligns with ASAM criteria and SAMHSA recovery principles
- Emphasizes person-centered, trauma-informed care

Improvement

Aligns clinical services with national best practices and supports high-quality outcomes.

2.16 Infection Control and Exposure Prevention

Key Updates

- Expands infection control protocols based on CDC and OSHA standards
- Requires training, PPE use, and exposure reporting
- Establishes environmental and safety expectations

Improvement

Protects staff and individuals while ensuring compliance with healthcare safety standards.

2.16.1 Tuberculosis (TB) Screening and Prevention

Key Updates

- Requires TB screening for employees and residential individuals
- Establishes documentation, reporting, and training requirements
- Aligns with CDC and ADMH guidelines

Improvement

Enhances infection prevention and supports public health compliance.

2.17 Infectious Disease (HIV/STD) Services**Key Updates**

- Expands access to education, testing, and case management
- Ensures services regardless of testing acceptance or status
- Aligns with federal block grant requirements

Improvement

Improves public health outcomes and ensures comprehensive care for high-risk populations.

2.27 Vendor and Visitor Access and Confidentiality**Key Updates**

- Requires sign-in, badges, and confidentiality agreements
- Establishes escort and restricted access procedures
- Reinforces HIPAA compliance

Improvement

Strengthens protection of confidential information and facility security.