



Ohio Recovery Housing

Ohio Recovery Housing Assurances



Agenda

- ORH Assurances
- ORH Agreement
- NARR Code of Ethics

Introduction

ORH's Role in Compliance

- ORH does not check federal, local, or state codes or laws for compliance
- Responsibility lies with the owner/operator

Grant Funding Requirements

- ORH is not responsible for ensuring compliance with grant funding requirements
- Responsibility lies with the individual owner or organization

Liabilities for Misrepresentations

- Organizations assume all liabilities for any misrepresentations
- Misrepresentations make organizations ineligible for ORH certification

Documentation Requests

- Organizations may need to provide documentation to support attestations
- Requests for documentation can be made by ORH

Legal Recognition and Reporting



- Entity is legally incorporated within Ohio
- Has an EIN Number
- Recognized by the IRS
- Can be non-profit or for profit
- Compliance with Legal Expectations
 - Reporting requirements are met
 - Records are maintained
 - Financial data is maintained

For non-profits - Board of Directors Meetings Documentation

- Documentation of Board of Directors Meetings
 - Minutes must be documented
 - Minutes must be kept on file



Staff Records



- Staff Certification and Credentialing
 - Ensures staff are appropriately credentialed according to the work they are doing
 - Maintains procedures for credentialing as appropriate
- Record-Keeping Systems
 - Maintains systems for employees and residents
 - Includes legally required criminal background checks

Building Inspections and Compliance



- Compliance
 - Based on building type
 - Local/state building code
- Required Inspections
 - Building inspections
 - Egress inspections
 - Building component inspections
- Specific Components
 - Elevators
 - Automated security systems
 - Fire suppression systems

How to check local building codes

- Internet Search for YOUR CITY NAME and Building Code
- Most cities post the zoning and building codes online
- You can also contact their office for a copy
- Check which zone your home is in
- Check that your building meets the appropriate building type for your zone



Your ORH Certification does NOT override local building code

- Signing these assurances states that you have researched your local building codes and are in compliance
- We will NOT check these for you
- If we later discover you are out of compliance it could impact your certification





You CAN request reasonable accommodations from the local city

- See our guidance online
- Contact ORH for more information
- Seek legal assistance



Fire Inspections and Safety Drills (as required)

- Compliance with State and Local Requirements
 - Organization adheres to fire inspection regulations
 - Fire safety drills are conducted as required
- Official Fire Inspections
 - Inspections performed by certified fire inspectors
 - All expectations of inspectors are met
- Documentation
 - Any inspections are documented
 - Fire safety drills are recorded



Bedroom Egress and Space Requirements

- Appropriate Egresses
 - Meet federal, state, or local residential or building code
- Space Requirements
 - 70 square feet for the first person
 - Additional 50 square feet per each additional person

Compliance with Grant/ Funding

- ORH is not responsible for grant funding requirements
 - Compliance with state, federal, local, or private foundation grants
- Accounting and Budget Management
 - Maintaining an adequate accounting system
 - Annual budget for effective program management
 - Meeting mandated reporting requirements
- Insurance Requirements
 - Homeowners/renters and liability insurance
 - Coverage for all properties managed



Fair Housing and Financial Management

- Compliance with Fair Housing Requirements
 - Adherence to federal, state, and local fair housing laws
 - Process for considering reasonable accommodation requests



Honest and Substantiated Marketing Claims

- Honest and Substantiated Claims
 - Claims must be truthful and supported by evidence
- Prohibited Content in Marketing
 - False or misleading statements
 - Unfounded claims or exaggerations
 - Testimonials not reflecting real opinions
 - Misleading price claims
 - Therapeutic strategies requiring licensure not applicable at the site
 - Misleading representations of outcomes



Confidentiality Laws Compliance

- You will comply with applicable confidentiality laws
- This may vary depending on your relationship with treatment centers or your funding sources



False Claims Act and Anti-Kick Back Statutes

- Compliance with False Claims Act
 - Ensuring no fraudulent claims are made
- Adherence to Anti-Kick Back Statutes
 - Preventing improper financial incentives
- Observance of Exclusion Statute
 - Avoiding engagement with excluded individuals or entities
- Compliance with Section 1128A(a)(5) of the Social Security Act
 - Maintaining appropriate billing and referral practices
- Adherence to all state and federal laws
 - Ensuring operations align with legal requirements



Open Investigations Disclosure

Certification Attestation

- No open investigations
- Executive leadership compliance

False Marketing

- No allegations

Medicaid or Financial Fraud

- No accusations

Abuse and/or Neglect

- No reports

Fair Housing

- No violations

Building or Zoning Code Violations

- No violations or reports

Signed and Notarized

- The Assurances Document must be downloaded, printed, signed and notarized.
- Then you will scan it, save an electronic copy and upload
- Keep the original for your records






NARR Code of Ethics

Who must comply

- All staff who have interaction with residents
- Should sign the code of ethics and keep it on file





Obligations of
Recovery
Residence
Owners/Operators
and Staff

Value and Respect for Residents

- Each resident's recovery is prioritized
- Individual needs are considered in decision making

Obligation of Owners/Operators and Staff

- Commitment to residents' well-being
- Adherence to recovery principles

Assessing Resident Needs

- Assess Resident Needs
 - Evaluate the specific needs of each potential resident
 - Determine the suitability of the residence's support level
- Provide Assistance for Referrals
 - Assist residents with referrals within the residence
 - Help residents with referrals outside the residence



Stopping Intimidation and Bullying

- Stop Intimidation and Bullying
 - Address any form of intimidation among residents, staff, and visitors
 - Implement measures to prevent bullying within the residence
- Prevent Sexual Harassment
 - Take action against sexual harassment incidents
 - Ensure a safe environment for all individuals
- Address Threatening Behavior
 - Identify and stop threatening behavior promptly
 - Maintain a secure atmosphere for everyone
- Prevent Retribution and Negative Consequences
 - Take steps to avoid retribution following grievances
 - Ensure complaints do not lead to negative outcomes
- Value diversity and non-discrimination



Maintain Appropriate Environment

- Safe, Homelike Environment
- Alcohol- and Illicit-Drug-Free Environment that is recovery focused
- Honor Recovery Paths
- Privacy and Personal Rights
- Consistent Rules that promote health safety and welfare and are implemented fairly
- Encourage Professional Relationships





Reading and Signing the Code of Ethics

- Mandatory Reading and Signing
 - All associated individuals must read the Code of Ethics
 - Includes owners, operators, staff, and volunteers
- Obligation to Report Unethical Practices
 - Individuals must report unethical practices
 - Follow reporting rules set by the affiliate



ORH Agreement

Is Signed when you submit your
application

Name _____

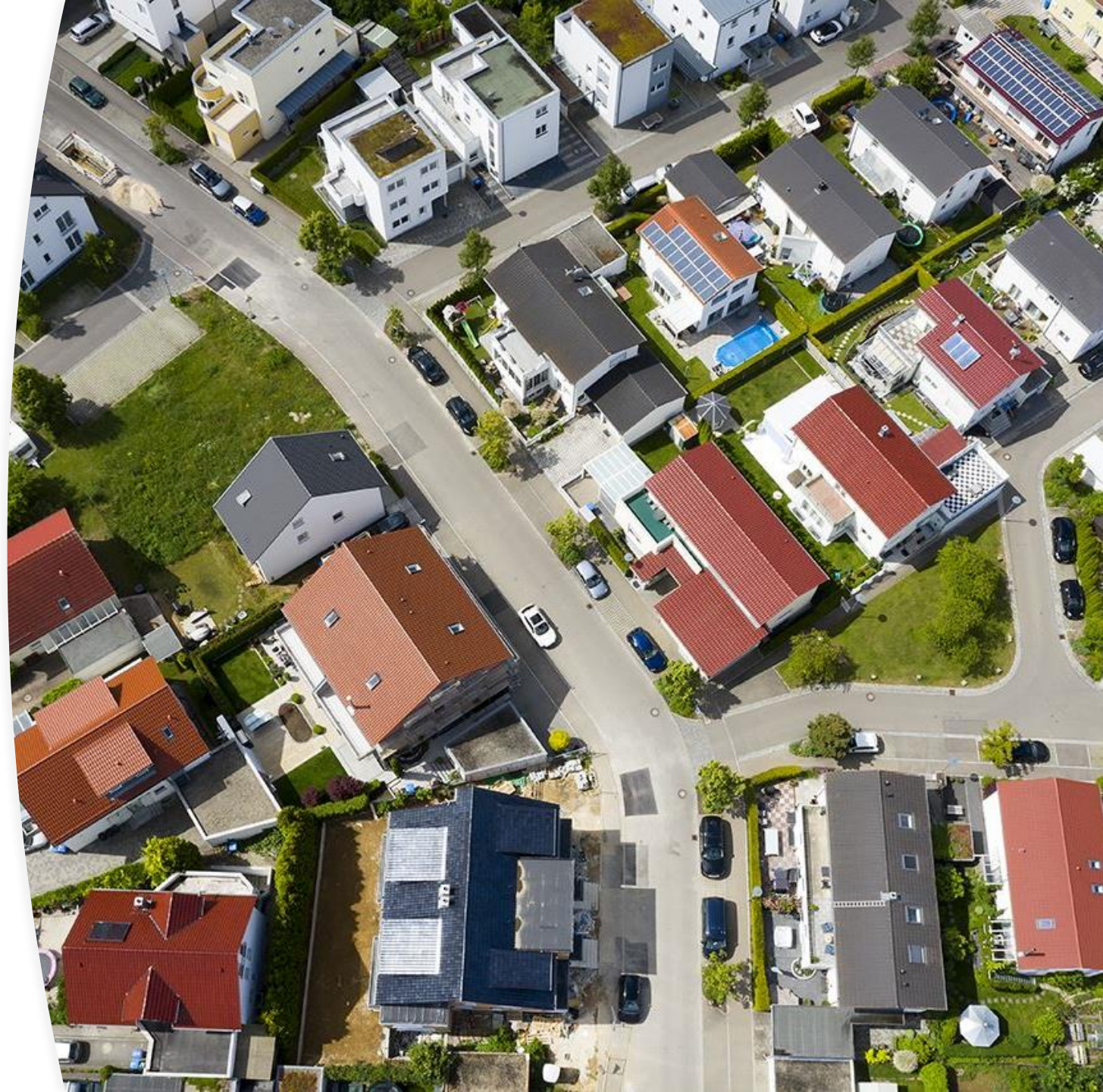
Signature _____

Date _____



UPHOLDING THE CODE OF ETHICS

- Commitment to NARR Code of Ethics
 - Agreement to uphold ethical standards
 - Ensuring visibility of the Code of Ethics
- Posting or Including Code of Ethics
 - Post a copy in common areas
 - Include copies in a binder
- Recovery Housing Property
 - Application to each property
 - Common area accessibility



DO NOT PROVIDE FALSE INFORMATION

- Violation of NARR Code of Ethics
 - False information provided by organization
 - Representatives of organization involved
- Certification Impact
 - Organization unable to become certified
 - Loss of ORH certification



Policy Implementation Verification

Policy Implementation Verification

- Policies, procedures, and protocols submitted to ORH must be implemented in practice

Agreement and Verification

- Signing the agreement verifies that submitted policies are currently in practice at listed recovery housing properties

Violation of NARR Code of Ethics

- Discrepancies between submitted and implemented policies will be considered a violation
- Possible consequences include inability to become certified or loss of ORH certification

Maintaining Accurate Contact Information



Primary Communication via Email

ORH will use the provided email address for communication
Ensure the email address is current and accurate



Responsibility of Contact Information

It is the organization's responsibility to keep contact information updated



Consequences of Unresponsive Contact

ORH may assume the recovery home has closed if there is no response
Action may be taken if the organization cannot confirm its operation

Responding to ORH Communications

- Responding to Communications
 - Responsibility to respond to ORH communications
 - Failure to respond may result in application or certification lapse
- Quality Improvement Requests
 - May be asked questions or to make quality improvements
 - Failure to respond to these requests may result in application lapse



Information Sharing with Entities



- Certification Status Information Sharing
 - ORH may share information about certification status
 - Information may be shared with Ohio Department of Mental Health and Addiction Services/ County Boards or funders of RH services
- Grievance Information Sharing
 - ORH may share information about grievances filed
 - Information may be shared with local ADAMH boards
 - Information may be shared with other potential funding entities



You must tell us about changes in leadership/ ownership

- Informing ORH about Changes in Ownership
 - Responsibility to notify ORH if homes change ownership
- Updating ORH on Executive Leadership Changes
 - Inform ORH if there are changes in executive leadership
- Notifying ORH about Closures or Relocations
 - Responsibility to inform ORH if homes close or move locations
- Reporting Significant Program Changes
 - Inform ORH if there are significant changes to the program
 - Changes in population served, gender(s) served, level of support



On-site Review and Fees

- On-Site Review Fee
 - Initial fee required for first review
 - Second fee required if first review fails
- No fees for visits related to complaints
- You will get an invoice

Complaint Review Process

Understanding the ORH Complaint Review Process

- Participation required if there's a complaint about recovery homes
- Provide information to ORH as per the process

Agreement to Participate

- Timely participation and information provision
- Non-compliance may lead to certification termination

Appeal Process

- Understanding Appeal Rights
 - Ability to appeal any decision or action by ORH
 - Appeal process in accordance with ORH guidelines

Certification Requirement for All Properties

- Certification of Recovery Housing Properties
 - All properties operated by the organization must be certified or on an active application if they are OCCUPIED
 - If residents are living in the properties



Separation from Treatment Program Services

- Separation of Recovery Housing Residences
 - Residences must be separate from treatment program services
 - Maintain appropriate separation in programming and physical structure





ORH Property Visits

- Permission for Property Visits
 - ORH may visit the property at any time - announced or unannounced
 - It may be in response to a complaint or otherwise
 - Visits require permission from residents

NOTIFICATION OF CONVICTIONS OR FRAUDULENT ACTIVITY

- Notification Obligation
 - Must notify ORH if convicted of a crime
 - Must notify ORH if found guilty of fraudulent activity
 - If you are being investigated
- Review Process
 - ORH will engage in an appropriate review process
- Consequences of Failure to Notify
 - Loss of certification





Questions