***DEPARTMENT OF BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES***
***CORRECTIVE ACTION PLAN***



License #: **1746-14-008**
Organization Name: **Gateway Counseling Center**

Date of Inspection: **12-29-2025**
Program Type/Facility Name: **14-008 Belvedere Drive**

| Standard(s) Cited | Comp | Description of Noncompliance | Actions to be Taken | Planned Comp. Date |
|---|---|---|---|---|
| 12VAC35-46-300. B. (6) - The records of each employee shall include: 6. Documentation of compliance with requirements of Virginia laws regarding child protective services and criminal history background investigations; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: E#1 and E#2 do not have documentation of FBI criminal background checks. | PR) 01/20/2026<br><br>During the licensing review it became apparent that during the most recent file review by Program Director, that the FBI Criminal Background check for two long standing employees had accidentally been discarded and that the wrong form had been mistakenly preserved in error. The background check for E1 has already been completed and placed in the file; and the background for E2 will be completed on 1/23 as he had to cancel the first appointment due to illness. In moving forward, Program Director is aware of which documents are to be maintained and will be conscientious about making errors regarding proper forms. Employee files will continue to be reviewed on a regular, quarterly basis.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-660. H. - Entries in a resident's record shall be current, dated, and authenticated by the person making the entry. Errors shall be corrected by striking through and initialing. | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes resident's record shall be current, dated, and authenticated by the person making the entry. Errors shall be corrected by striking through and initialing. If records are electronic,<br><br>the provider shall develop and implement a policy and procedure to identify how corrections to the record will be made. A review of weekly therapy notes confirmed that all notes for all residents do not include the year the note was entered. A review of clinical records found no documentation of MH diagnosis made by a qualified licensed professional prior to admission, provider indicated post review that documentation is in a separate location. A review of the Daily Progress notes includes a case management daily note, however not entered by the case manager, and does not actually reflect case management activity. A review of the monthly Case Management notes entered on the providers' standardized form are not complete and leave progress or activity in multiple categories blank. | PR) 01/20/2026<br><br>Program Director (PD) has reviewed this CAP with therapist and noted with her the importance of a full date, including year of entry being entered on each individual note. PD will review all notes weekly for full dates.<br><br>PD is aware that a Clinical Diagnosis is required with the admission documents for each accepted child, prior to placement and that documentation (IAACTS and CONs) will be maintained in each client file rather than in the Medicaid documents where the documents can be easily accessed and viewed by licensing reviewer.<br><br>The Case Management notes will be documented by the Case Manager (CM) or PD for each child and all blanks on the forms utilized will be completed. Additionally, there will be a Case Management section in each monthly CPOC that discusses the monthly progress of each resident and the CM activities and level of participation of the resident of all CM activities that are conducted/concluded each month.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-670. - Complete written policies and procedures for record reviews shall be developed and implemented that shall evaluate records for completeness, accuracy, and timeliness of documentation. Such policies shall include provisions for ongoing review to determine whether records contain all required service documentation, and release of information documents required by the provider. | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by:<br><br>A resident record review for R#1 & R2 concludes written policies and procedures for record reviews are not adequately developed and implemented to evaluate records for completeness, accuracy, and timeliness of documentation. Such policies shall include provisions for ongoing review to determine whether records contain all required service documentation, and release of information documents required by the provider. A review of weekly therapy notes confirmed that all notes for all residents do not include the year the note was entered. A review of clinical records found no documentation of MH diagnosis made by a qualified licensed professional prior to admission, provider indicated post review that documentation is in a separate location. A review of the Daily Progress notes includes a case management daily note, however not entered by the case manager, and does not actually reflect case management activity. A review of the monthly Case Management notes entered on the providers' standardized form are not complete and leave progress or activity in multiple categories blank. | PR) 01/20/2026<br><br>All records will be reviewed quarterly by PD to ensure completeness, accuracy and timeliness of documentation.<br><br>Program Director (PD) has reviewed this CAP with therapist and noted with her the importance of a full date, including year of entry being entered on each individual note. PD will review all notes weekly for full dates.<br><br>PD is aware that a Clinical Diagnosis is required with the admission documents for each accepted child, prior to placement and that documentation (IAACTS and CONs) will be maintained in each client file rather than in the Medicaid documents where the documents can be easily accessed and viewed by licensing reviewer.<br><br>The Case Management notes will be documented by the Case Manager (CM) or PD for each child and all blanks on the forms utilized will be completed. Additionally, there will be a Case Management section in each monthly CPOC that discusses the monthly progress of each resident and the CM activities and level of participation of the resident of all CM activities that are conducted/concluded each month.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. A. - Admission shall be based on evaluation of a screening application for admission. The requirements of this section do not apply to court-ordered placements or transfer of a resident between residential facilities located in Virginia and operated by the same sponsor. | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (1) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 1. The educational needs of the prospective resident; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, educational needs, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (10) - Providers shall develop and fully complete prior to acceptance for care an application for admission that is designed to compile screening information necessary to determine: 10. History of previous treatment for mental health, developmental disability, substance abuse, brain injury, and behavior problems; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, history of previous treatment for mental health, developmental disability, substance abuse, brain injury and behavior problems, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (11a) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 11. Medication and drug use profile, which shall include: 11a. History of prescription, nonprescription, and illicit drugs taken over the six months prior to admission; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, medication and drug use profile, history of prescription and non-prescription and illicit drugs taken during the 6 months prior to admission, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (11b) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 11. Medication and drug use profile, which shall include: 11b.Drug allergies, unusual and other adverse drug reactions, and ineffective medications; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, drug allergies, unusual and other adverse drug reactions and ineffective medications, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (11c) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 11. Medication and drug use profile, which shall include: 11c. Information necessary to develop an individualized service plan and a behavior support plan. | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, information necessary to develop an individualized service plan and behavior support plan, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (2) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 2. The mental health, emotional, and psychological needs of the prospective resident; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, the mental health, emotional and psychological needs of prospective resident as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (3) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 3. The physical health needs, including the immunization needs, of the prospective resident; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, the physical needs, including the immunization needs, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (4) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 4. The protection needs of the prospective resident; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, the protection needs of prospective resident, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (5) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 5. The suitability of the prospective resident's admission; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, the suitability of the prospective resident's admission, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (6) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 6. The behavior support needs of the prospective resident; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, the behavior support needs of prospective client, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (7) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 7. Family history and relationships; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, the family history and relationships, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (8) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 8. Social and development history; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, the social and developmental history, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |

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| 12VAC35-46-710. B. (9) - Providers shall develop, and fully complete prior to acceptance for care, an application for admission that is designed to compile information necessary to determine: 9. Current behavioral functioning and social competence; | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population being served, current behavioral functioning and social competence, as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home.<br><br>OLR) Accepted 01/28/2026 | 1/25/2026 |
| 12VAC35-46-710. C. - The resident's record shall contain a completed assessment based on information compiled from the screening application at the time of a routine admission or within 30 days after an emergency admission. | N | Belvedere Drive<br>This regulation was NOT MET as evidenced by: A resident record review for R#1 & R2 concludes provider is not completing their own admission application/assessment and rely on external entities to complete the evaluation. This practice does not ensure the resident is appropriate for admission and a clinically appropriate fit considering the other residents in the home. | PR) 01/20/2026<br><br>The admissions application which is generally completed by the placing agency has been reviewed and the licensing reviewer has offered excellent suggestions for separating the information required into that which is provided by the agency who is familiar with child, and that which needs to be thoroughly assed by Gateway to determine the appropriateness of the placement in regards to the current population | 1/25/2026 |

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| | | | being served as well as the other relevant factors that require consideration. Gateway will use the current application to acquire as much information as is available from the placing agency, an initial screening. An additional form will be utilized by Gateway that assesses the completeness of the information provided and indicates that the child is clinically appropriate for placement at Gateway considering the other residents in the home - to be completed by the provider/PD.<br><br>All of the violations involving information gathered for evaluating the prospective client are based on the fact that the application was filled out/completed by the placing agency rather than by the provider. All information provided was ALWAYS reviewed and assessed by provider to ensure appropriateness of placement and said assessment was documented on last paragraph of application.<br><br>However, the new process of separating out the Initial Screening (by placing agency) and the Comprehensive Assessment (by provider) will be adhered to at all times, moving forward.<br><br>OLR) Accepted 01/28/2026 | |

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**General Comments / Recommendations:**
**Provider needs to review all policies and procedures to ensure they align with current process. Provider should also review the depth of clinical documentation to ensure it is clear the elements of ISPs are being implemented in progress notes and reviewed in both individual and group therapy sessions.**

I understand it is my right to request a conference with the reviewer and the reviewer's supervisor should I desire further discussion of these findings. By my signature on the Corrective Action Plan, I pledge that the actions to be taken will be completed as identified by the date indicated.

| Christopher Cart, Licensing Specialist | (Signature of Organization Representative) | Date |
|---|---|---|

C = Substantial Compliance, N = Non Compliance, NS = Non Compliance Systemic, ND = Non Determined