



National Association of Therapeutic Schools & Programs

BEST PRACTICES COMMITTEE NEWSLETTER SUMMER 2016

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On behalf of the NATSAP Best Practices Committee, I'd like to welcome you to our newsletter.

The purpose of this newsletter is to:

1. Inform NATSAP members of current issues regarding implementation of Best Practices in various areas.
2. Provide NATSAP members a forum to discuss concerns programs have regarding Best Practices.
3. Educate NATSAP members who have questions about how to implement Best Practices.
4. Inform NATSAP members on what Best Practices are.

The Committee meets via phone conference every month. If you are interested in joining the committee, please contact me.

All my best,
David LePere, dlepere@cherokeecreek.net

HIPAA: Are You REALLY a Covered Entity? (Hint ~ You may not be!)

By: Tauni Aikin, CHP, CHSS

[The Health Insurance Portability and Accountability Act](#), (aka, The Act and HIPAA) is a national, extensive and very complicated topic. As a risk management consultant in our industry, I come across many organizations that make an assumption they are subject to HIPAA based on a variety of factors including, but not limited to, types of service they provide, use of email to communicate, electronic data storage and types of information they collect and manage. However, many are not subject to HIPAA.

There are two basic business categories identified in The Act, [Covered Entities and Business Associates](#), which are required to comply with the regulatory standards. A Covered Entity is defined as a health plan, health care clearinghouse, and any health care provider **who transmits health information in an electronic form in connection with the transactions for which the Secretary of Health and Human Services has adopted standards under HIPAA** (author emphasis added). A Business Associate is a business or individual that, on behalf of a covered entity, performs or assists in the performance of a function or activity involving the use or disclosure of individually identifiable health information. This could include, but is not limited to legal, consulting, financial, data aggregation and/or management, etc. where the provision of the service involves the disclosure of individually identifiable health information from a covered entity.

So what are these transactions? They are primarily related to insurance billing and claims such as benefit eligibility inquiries, referral authorization requests, claims processing and

billing (you can [check here](#) for a complete list). If a business does not transmit health information in an electronic form in connection with any of the covered transactions, it is **not** a Covered Entity and therefore is not required to comply with HIPAA. Every entity covered by HIPAA (whether a Covered Entity or Business Associate) is required to develop and implement policies and procedures governing compliance to the standard. These requirements are noted in the [Privacy Rule](#) and the [Security Rule](#). The Privacy Rule outlines the safeguards required to protect the privacy of personal health information. It establishes the limits and conditions on the uses and disclosures that may be made without patient authorization, and also establishes rights for patients over their health information. The Security Rule outlines the required administrative, physical and technical safeguards which need to be addressed to keep information secure.

It is important to note; however, that patient/client/participant confidentiality is governed by multiple regulatory agencies. It is critical for a program to know which agencies they are required to answer to. Many agencies have overlapping requirements and some have conflicting ones.

In conclusion, HIPAA applies only to entities which conduct transactions electronically for which a standard has been developed. It also applies to business associates which conduct business with covered entities where they may have access to protected health information in the process of transacting business.

Additional helpful links:

<https://personcenteredtech.com/2013/05/16/am-i-a-hipaa-covered-entity-how-much-does-it-matter-if-i-am-or-not/>

<https://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/HIPAAGenInfo/Downloads/CoveredEntitycharts.pdf>



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Transitioning from Therapeutic Placement to Traditional Placement

By: Tim Viands, Headmaster

The Productive Growth Center at Grand River Academy helps young men transition from a therapeutic environment into a traditional boarding school environment. Our team aids the young in learning mental and physical skills necessary to adapt to the different surroundings. Grand River Academy firmly believes in providing programs that support healthy lifestyles and the enrichment of character through emotional awareness as part of its mission to prepare young men for lifelong success.

Young male teenagers attend therapeutic programs for a variety of reasons; however, all who attend benefit from the structure and support that is provided within these programs. When young men find success in therapeutic programs and they are ready to transition onward to a traditional academic environment, they need structure during their transition. In doing so we provide Best Practices for them. Therapeutic programs, such as Cherokee Creek, offer a type of transition plan that young men need for their new school or environment to help provide support during their transition.

The Productive Growth Center at Grand River Academy provides the necessary additional support young men need when transi-

tioning from a therapeutic program. The Center teaches the value of hands-on, project-based activities within their counseling sessions, and how to integrate these skills directly into recreational and social activities. These skills help young men focus their energy in a productive and positive manner, empowering them to identify and work through issues to assist in educational and personal growth.

Led by GRA Counselor and Faculty Mr. Thomas Polak, the Center engages the whole person and demands both focus and physical activity when wood-working with hand tools. As he shares with others, Mr. Polak states that the aim of the Center "is to use the tradition of woodcraft and combine it with talk therapy, as a non-traditional mode of counseling." Wood-working demands both focus and physical activity. This kind of wholesome activity builds relationships and when the hands start moving, often times, conversation naturally follows.

Sometimes young men are not ready to face that internal dialogue and need to spend some time simply working with their hands, which can be evident during a transition period from a therapeutic program. By providing the additional support, it allows the student to adapt to the change of environment and transition internally on his own timeframe, as supported by the William Bridges Transitions Program.

The benefits of the Center are not limited to providing a transition period for young men. Approaching a project engages much of the brain, and the student must break down and consider each part of the project to see how those parts fit into the whole. Each part has stages to completion and a particular knowledge is necessary to complete each stage of production. A young man must determine what tools to use and how to best use them. This provides an opportunity for learning, development, and growth as a young man envisions the end result

and must create a detailed list of steps to complete his project. The dedication to complete his project and to see and feel the finished result can provide positive self-affirmation and can be applied to other areas of a young man's life.

Headmaster Tim Viands shares that "providing the additional support necessary to find continued success after a therapeutic program for a young man is central to Grand River Academy's mission in developing the total young man, academically, emotionally, and socially. The Productive Growth Center allows for the additional support while teaching skills that will continue to benefit the student throughout his time at the Academy and after." Mr. Thomas Polak agrees saying, "With the availability of a hand tool workshop, students can individually and collectively complete purposeful projects that impact not only their emotional growth, but the campus community as a whole." The Center supports young men transitioning from a therapeutic program to a traditional boarding school environment while allowing the internal transition for this change to occur.

Items to link

<http://www.grandriver.org/academics/productive-growth-center>

<https://www.mindtools.com/pages/article/bridges-transition-model.htm>

<http://www.admissionsquest.com/onboardingschools/2016/01/the-benefits-of-teaching-boys-to-work-with-their-hands.html>



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NATSAP Best Practices Workshop Follow-Up

By: Tim Davis and Rujon Morrison

At the 2016 annual conference, the Best Practices Committee presented a school and program self-study guide to aid organizations in their goal to provide high quality and best practice services to their clients. Ten overall concepts were discussed. In this newsletter, we will discuss the first three items on the self-study guide. The concepts listed are both NATSAP best practice principles as well as many national accreditation organizations required standards.

1 – Organizations establish policies that define their scope of service.

NATSAP Admission/Discharge Policy – 4.0
Defining your organization's vision or mission is the first step in deciding who you want to serve, in what ways, as well as ruling out those you cannot serve. Determining treatment philosophies, physical space, program design, staff qualifications/ratios, and capacity-the number you can serve-are critical components. In most cases, state licensure agencies provide guidelines for these areas.

From this practice, the organization will decide what overall services it can provide and under what circumstances those services can be provided. Equally important is deciding which services are beyond your area of expertise and letting families know that you do not provide those services. The adage "We cannot be everything to eve-

rybody" is appropriate here.

Defining scope and services is the foundation for developing and maintaining your marketing. It is critical that your marketing endeavors are congruent with and reflect your scope of services.

2 – Organizations screen all potential clients to assess their needs and to determine if the organization can meet those needs or not.

NATSAP Admission/Discharge Policy – 4.0
Developing admission criteria and the screening process enables you to determine whether or not you can serve applicants. i.e. whether you accept or deny the application. The situation you want to avoid is accepting a child into service and then realizing your organization does not have the capacity to adequately address those needs.

While each program must define general discharge criteria based upon the organization's scope of services, each case may be somewhat

unique. Defining these from the beginning equips the treatment team and client with knowledge of the "end" goals and what it means to leave the program successfully. Discharge criteria also provide guidelines for removal from your program, to another program, or need for a higher level of care. Both admission criteria and discharge criteria must be explained thoroughly to clients. What is discussed must also be reflected in your policies and procedures.

3 – Organizations use data and information to guide decisions to understand variations in performance.

NATSAP Administrative Practices and Procedures – 2.1.2.1

Most organizations gather data on a regular basis, often times covering a wide variety of issues and statistics. This concept requires organizations to establish regular times to review the data and to decide, as an organization, what the data tells you. The information may be positive, negative, or neutral. The important point is that the organization decides itself what the data means and then decides to continue a practice, modify a practice, or eliminate a practice. Many results are already known to the organization; however, it is important to keep an open mind when reviewing the data and using it in a positive way to improve services. Documenting your methods of reviews and findings is vital.

It is important to remember that these concepts work best if organizations use them to their own specific needs and missions. These ideas are most beneficial if organizations view them as a way to improve services, rather than as an external requirement from an outside source.

Best Practices Committee Members

Chairperson:

David LePere, Executive Director, Cherokee Creek Boys School

Board Liaison:

Patrick Barrasso, CEO/Owner, In Balance Ranch Academy

Members:

- * Dan Tadlock, Clinical Director, Northwest Academy
- * Tim Davis, Executive Director, Tamarack Center
- * Marcy Dorfman, Educational Consultant, Score at the Top
- * Carl Baccellieri, Executive Director, Living Well Transitions
- * McKay Livingston, Anthem House Program Manager, Telos
- * Rujon Morrison, Program Director, Shelterwood Academy
- * Joshua Wallace, Director of Operations, Shepherds Hill Academy
- * Besty Jacobson Warren, Director of Private Programs, The Academy at Sisters
- * Jace Young, Residential Director, Telos
- * Glenn White, Founder/Owner, Dragon Fly Transitions
- * Douglas Marshall, Director of Marketing and Enrollment, Homeward Bound
- * Tauni Aikin, Management Consultant
- * Ellen Jaeger, Director of Therapy Resources, Innercept

5272 River Road Bethesda, MD 20816

Phone: (301) 986-8770 | Fax: (301) 986-8772

www.natsap.org | info@natsap.org