



FrontLine
Service

CLIENT RIGHTS HANDBOOK

1744 Payne Avenue, Cleveland, Ohio 44114

Voice: (216) 623-6555

TTY: 623-6540

Mobile Crisis: (216) 623-6888

Reaching out to adults and children in Northeast Ohio to end homelessness, prevent suicide, resolve behavioral health crises, and overcome trauma.

A contract agency of the ADAMHS Board of Cuyahoga County

April 2023

YOUR RIGHTS AS A CLIENT OF FRONTLINE SERVICE

It is the practice of FrontLine Service to nurture and protect the dignity and respect of all persons served.

Response time to any individual seeking services is dependent upon your presenting problem.

In a crisis or emergency situation, you must be verbally advised of at least the immediately pertinent rights, such as the right to consent or refuse the treatment being offered and the consequences of that agreement or refusal. Full verbal explanation of the client rights policy shall be provided at the first subsequent meeting.

A written copy and a full explanation of the Client Rights, Complaint and Grievance Policy will be provided to you within 24 hours of admission to the agency if you are not in crisis.

Explanation of rights shall be provided in a manner appropriate for the person's level of understanding.

These are your rights:

Each person who accesses mental health services is informed of these rights:

1. The right to be verbally informed of all client rights, and to receive a written copy upon request.
2. The right to be fully informed of the cost of services.

Services are appropriate and respectful of personal liberty:

3. You have the right to be treated with consideration, respect for personal dignity, autonomy, and privacy.
4. The right to reasonable protection from physical, sexual, or emotional abuse, inhumane treatment, humiliation, neglect and financial or other exploitation.

5. The right to participate in any appropriate and available service that is consistent with an individual service plan (ISP), regardless of the refusal of any other service, unless that service is a necessity for clear treatment reasons and requires the person's participation.

6. The right to receive services in the least restrictive, feasible environment.

Development of service plans:

7. The right to participate in the development, review, and revision of one's own individualized treatment plan and receive a copy of it.

Declining or consenting to services:

8. The right to give informed consent or refusal or expression of choice regarding involvement in research projects, composition of the service delivery team, release of information, any service, treatment, or therapy, including medication absent an emergency.

9. The right to be advised of and refuse observation by techniques such as one-way vision mirrors, tape recorders, video recorders, television, movies, photographs, or other audio and visual technology. This right does not prohibit an agency from using closed-circuit monitoring to observe seclusion rooms or common areas, which does not include bathrooms or sleeping areas.

10. The right to be informed and the right to refuse any unusual or hazardous treatment procedures.

Restraint, seclusion or intrusive procedures:

11. The right to freedom from unnecessary or excessive medication and to be free from restraint or seclusion unless there is imminent risk of physical harm to self or others.

Confidentiality:

12. The right to confidentiality of communications and personal identifying information within the limitations and requirements for disclosure of client information under state and federal laws and regulations.

Grievances:

13. The right to file a grievance.

14. The right to have oral and written instructions concerning the procedure for filing a grievance, and to assistance in filing a grievance if requested.

Non-discrimination:

15. The right not to be discriminated against for receiving services on the basis of race, ethnicity, age, color, religion, gender, national origin, sexual orientation, physical or mental handicap, developmental disability, genetic information, human immunodeficiency virus status, or in any manner prohibited by local, state, or federal laws.

No reprisal for exercising rights:

16. The right to exercise one's own rights without reprisal except that no right extends so far as to supersede health and safety considerations.

Outside opinions:

17. The right to consult with an independent treatment specialist or legal counsel, at one's own expense.

Additionally:

18. The right to have access to one's own client record unless access to certain information is restricted for clear treatment reasons. If access is restricted, the treatment plan shall include the reason for the restriction, a goal to remove the restriction, and the treatment being offered to remove the restriction.

19. The right to be informed in a reasonable amount of time in advance of the reason(s) for terminating participation in a service, and to be provided a referral, unless the service is unavailable or not necessary.

20. The right to be informed of the reason(s) for denial of a service.

21. The right to be informed of one's own condition.

22. The right to have access to information pertinent to the persons served in sufficient time to facilitate the person's decision-making.

23. The right to have access or referral to legal entities for appropriate representation, self-help, and advocacy support services.

RESIDENTIAL RIGHTS

If you stay in our Crisis Unit or at the Safe Havens, you have the following rights:

Each consumer of mental health services are informed of these rights:

1. The right to receive humane services in a clean, safe, comfortable, welcoming, stable, and supportive environment.
2. The right to retain personal property and possessions.
3. The right to be verbally informed of all resident rights in language and terms appropriate for the resident's understanding, prior to or at the time of residency, absent a crisis or emergency.
4. The right to request a written copy of all resident rights and the grievance procedure.
5. The right to file a grievance.

Residency and Access to Facility:

6. The right to reside in a class one residential facility, as available and appropriate to the type of care or services that the facility is licensed to provide, regardless of previous residency, unless there is a valid and specific necessity which precludes such residency. The necessity shall be documented and explained to the prospective resident.
7. The right to continued residency unless the facility is no longer able to meet the resident's care needs; the resident presents a documented danger to other residents, staff, or visitors; or the monthly charges have not been paid for more than thirty (30) days.

8. The right not to be locked out of the facility at any time.
9. The right of adult residents not to be locked in the facility at any time for any reason.
10. The right of an adult resident to have access to communal areas at all times.
11. The right to be informed in writing of the rates charged by the facility as well as any additional charges, and to receive thirty (30) days' notice in writing of any change in the rates and charges.

No Retaliation for Exercising Rights:

12. The right to exercise your rights without reprisal, except that no right extends so far as to supersede health and safety considerations.

Services are Appropriate and respectful of Personal Liberty

13. The right to be always regarded with courtesy and respect, and with consideration for personal dignity, autonomy, and privacy.
14. The right to receive services in the least restrictive, feasible environment.
15. The right to reasonable protection from physical, sexual, and emotional abuse, and exploitation.

Declining or Consenting to Services

16. The right to consent to or refuse treatment or services, or if the resident has a legal guardian, the right to have the legal guardian make decisions about treatment and services for the resident.
17. The right to be advised and the right to refuse observation by others and by techniques such as one-way vision mirrors, tape recorders, video recorders, television, movies, photographs or other audio and visual technology. This right does not prohibit a facility from using closed-circuit monitoring to observe seclusion rooms or communal areas of the facility such as hallways and community rooms.

18. The right to freedom from unnecessary or excessive medication, and the right to decline medication, except a class one facility which employs staff authorized by the Ohio Revised Code to administer medication and when there is imminent risk of physical harm to self or others.

Seclusion and Restraint

19. The right to be free from restraint or seclusion unless there is imminent risk of physical harm to self or others.

Confidentiality

20. The right to confidentiality of communications and personal identifying information within the limitations and requirements for disclosure of resident information under state and federal laws and regulations.

21. The right to meet or communicate with family or guardians, visitors, and guests:

- The right of an adult to reasonable privacy and freedom to meet with visitors and guests at reasonable hours.
- The right of an adult to make and/or receive confidential phone calls, including free local calls.
- The right of an adult to write or receive uncensored, unopened correspondence subject to the facility's rules regarding contraband.

Non-discrimination

22. The right to not be discriminated against on the basis of race, ethnicity, age, color, religion, gender, national origin, sexual orientation, physical or mental disability, developmental disability, genetic information, human immunodeficiency virus (HIV) status, or in any manner prohibited by local, state, or federal laws.

23. The right to practice a religion of his or her choice or to abstain from the practice of religion.

24. The right to engage in or refrain from engaging in cultural, social or community activities of the resident's own choosing in the facility and in the community.

Outside Opinions

25. The right to consult with an independent treatment specialist or legal counsel at one's own expense.

26. The right to communicate freely with and be visited without staff present at reasonable times by private counsel and, unless prior court restriction has been obtained, to communicate freely with and be visited at reasonable times by a personal physician, psychologist, or other health care providers. Employees or representatives of a board, provider, Ohio protection and advocacy system, state long-term ombudsman program may visit at any time when permitted by the Ohio Revised Code. The right to communicate freely includes receiving written communications which may be opened and inspected by facility staff in the presence of the resident recipient so long as the communication is then not read by the staff and given immediately to the resident.

27. The right to meet with staff from the Ohio Department of Mental Health and Addiction Services in private.

Conflicts of Interest

28. The right to be free from conflicts of interest; no residential facility employee may be a resident's guardian, custodian or representative.

Additionally:

29. The right of an adult resident to manage his/her own financial affairs, and to possess a reasonable sum of money.

30. The right to be informed of one's own condition.

31. The right not to be deprived of any legal rights solely by reason of residence in the facility.

32. The right to have access to one's own record unless access to certain information is restricted for clear treatment reasons. If access is restricted, a treatment/service plan shall include the reason for the restriction, a goal to remove the restriction, and the treatment/service being offered to remove the restriction.

THESE ARE YOUR RIGHTS WE WOULD LIKE YOU TO UNDERSTAND THEM

All clients have the freedom to express their choices regarding their service delivery team and their involvement in research projects. (See Research Policy/Procedures for additional information regarding research guidelines and ethics when persons served are involved.)

Special treatment interventions (such as seclusion and restraint) are not utilized at FrontLine Service. Restriction of a client's rights is only possible in circumstances where a client has demonstrated that they are a danger to themselves or others or have repeatedly breached program rules. In these circumstances, a contract or addendum to the treatment plan must indicate the right restriction, the timeframe of the restriction and under what circumstances the restriction will cease.

You also have rights pertaining to your Protected Health Information (PHI) as follows:

- The right to access your records
- To request restrictions on uses or disclosures of your PHI
- To request that communications related to PHI be confidential
- To request amendment of your records
- To receive accounting of disclosures of your PHI

Reasonable Accommodations

As required by the Rehabilitation Act of 1973, sensory-impaired people, including the blind and hearing impaired, are provided auxiliary aids at no cost, to allow them equal opportunity to participate in agency services.

When assistance is needed to communicate with clients who primarily speak other languages and have limited proficiency with English, CyraCom is contacted to provide interpreters. Interpretation services are provided at no cost to clients.

Agency clients, staff and other community stakeholders may contact the FrontLine Service's Client Rights Officer if they believe they are in need of reasonable accommodations because of barriers that exist, impacting their accessibility to services. Within 72 hours, the FrontLine Service Client Rights

Officer will identify and review the requested accommodations and forward recommendations to the Director of Quality Improvement for determination/further dissemination. Questions that are outlined in this review:

- Perceived barrier(s) to services/program.
- What reasonable accommodation(s) are being requested?
- What warrants reasonable accommodations?
- How many individuals does the perceived barrier impact?
- What would the cost be to eliminate the barrier?
- What would the cost be to provide the reasonable accommodations?

In instances where the removal/reduction of the barrier requires structural changes, or purchases of goods or services in excess of \$100.00, the Director of Quality Improvement presents the recommendation to the Executive Director, for a final decision. In instances where the removal/reduction of the barrier requires structural changes, or purchases of goods or services in excess of \$10,000.00, the Board of Trustees must review and approve the expenditure. In situations where FrontLine Service is unable to provide reasonable accommodations, the Director of Quality Improvement, or their designee, will assist the client in identifying other appropriate community resources available to them.

Requests for reasonable accommodations are identified, reviewed, decided upon, and documented. Records of reasonable accommodation are filed within the client chart or with the Quality Improvement Director.

Please read this booklet and know your rights.

The Client Rights Officer is available to talk with you about your rights and can offer you additional information and resources to help you better understand your rights.

If you . . .

- Have gone through the Civil Commitment process and have been ordered into outpatient or inpatient treatment by probate court,
- Are voluntarily or involuntarily hospitalized in a State-operated or private psychiatric hospital,
- Have been found Not Guilty by Reason of Insanity (NGRI) by a court of law, or if you
- Have been found incompetent to stand trial in a court of law...

. . . you have additional rights and there is additional information available to you.

You may contact:

- The Client Rights Officer at the ADAMHS Board of Cuyahoga County
- The Client Advocate or Patient Advocate at the hospital
- The Client Rights Officer at the Ohio Department of Mental Health
- Advocates from the Disability Rights Ohio

The contact information for these organizations can be found in the back of this handbook.

CLIENT RIGHTS, COMPLAINT AND GRIEVANCE POLICY

It is the practice of FrontLine Service to nurture and protect the dignity and respect of all persons served. The Client Rights and Grievance policy provides a means for people receiving services from FrontLine Service to make complaints regarding care, treatment, living conditions, or the exercise of rights and to have those complaints heard and acted upon in a timely manner without retaliation or barriers to services.

A formal review of complaints/grievances will be conducted annually by the Client Rights Officer (CRO) and presented to the FrontLine Service Management team. This review will identify trends and patterns, areas needing performance improvement, recommendations and actions taken.

The Client Rights and Grievance policy is readily available to persons served. All FrontLine Service clients are informed of their rights at initiation of service delivery by FrontLine Service staff, and then annually for clients served in a FrontLine Service program longer than one year. Clients served are verbally informed about their rights in a manner appropriate for their understanding and presented with the Client Rights and Grievance Policies and Procedures in the form of a Handbook. Additional copies of this handbook are available to clients at any time. Clients are also encouraged to contact the FrontLine Service Client Rights Officer in the event that additional clarification is needed. A copy of the Client Rights Handbook is available to any interested party upon request at any time.

A copy of the Client Rights and Grievance policy is posted at all agency sites.

FILING A COMPLAINT OR GRIEVANCE

Germain Clipps is your Client Rights Officer

Germain Clipps, CRO
1744 Payne Avenue
Cleveland, OH 44114

Phone: (216) 274-3528

Mr. Clippis can be reached between the hours of 9:00 a.m. and 5:00 p.m. Monday through Friday. You may contact him via telephone to talk about your concerns or to schedule an appointment. You are also welcome to walk in to talk with him; however, he may not always be immediately available to meet with walk-ins as he is sometimes meeting with clients off site. If you stop in and he is not here, you may complete a complaint form and leave your contact information so that he can follow up with you upon his return. Or you may request to speak with another member of the Quality Improvement Team.

Quality Improvement Staff are available at the same address (above) and can be reached by calling the main office number at 216-623-6555 during our regular business hours (9 a.m. – 5:00 p.m.).

CRO Responsibilities and Additional Grievance Information

The responsibilities of the CRO include advocating for your rights, assisting with the filing of your complaint or grievance, if needed, and representing you at agency hearings/meetings about the complaint, at your request. The CRO will document, investigate, and resolve the alleged infringement of rights via interviews, documentation reviews, etc. and will typically resolve the complaint or grievance within 20 business days from the date you first filed your concern. Upon request, the CRO will provide you with a clear written explanation of the way in which your complaint was resolved. Responses to a grievance will always be in writing.

Here are some of the other things that you need to know about the grievance/complaint procedure:

- When you talk about your concern, all staff including administrative and support staff will inform you that you can file a complaint or grievance with the Client Rights Officer if you wish to do so.
- The Client Rights Officer or any other staff person at FrontLine Service will explain the entire complaint and grievance process to any consumer who voices a concern, from the time the complaint or grievance is filed, until it is resolved.

- You will have the opportunity to file the complaint or grievance within a reasonable period of time.
- If the complaint is against the Client Rights Officer, another person will work with you.

The Client Rights Officer will inform you that you can also file a complaint or grievance with other outside agencies and will assist you with this filing if necessary. The names and phone numbers of these external rights protection agents are listed in the back of the Client Rights Handbook.

A grievance is an allegation of a violation of one of your client's rights.

If the concern you express is a grievance:

- The grievance must be in writing. (The CRO will assist you in writing a grievance upon request.)
- The grievance must be signed and dated by the person filing it.
- The grievance must include the date, approximate time, and description of the incident and names of individuals involved.
- Grievances may not be made anonymously, but grievance procedure provides a method for confidential submission of grievances. The CRO will maintain all such submissions and investigations in confidentiality.
- We will provide you with written acknowledgement of receipt of the grievance within three business days. This acknowledgement will include the date the grievance was received, a summary of the grievance, and overview of the grievance process, a timetable for completion of investigation and notification of resolution and the contact's name, address, and telephone number of the treatment provider.

WHERE ELSE TO FILE COMPLAINTS & GRIEVANCES

To file a grievance against the County public mental health and/or alcohol and drug addiction system, you may contact:

Client Rights Officer or Consumer Relations Specialist
Alcohol, Drug Addiction and Mental Health Services
Board of Cuyahoga County
2012 W. 25th St., 6th Floor
Cleveland, Ohio 44113
(216) 241-3400
Ohio Relay at 1-800-750-0750
www.adamhsbcc.org

Client Rights Advocacy
Ohio Department of Mental Health & Addiction Service (OhioMHAS)
30 East Broad Street, 8th Floor
Columbus, Oh 43215-3430
614-466-2596
1-877-275-6364
askODMH@mha.ohio.gov

To file a grievance against a social worker or counselor, contact:

Counselor, Social Worker and Marriage & Family Therapist Board
50 West Broad Street, Suite 1075
Columbus, Ohio 43215-5919
(614) 466-0912
Ohio Relay at 1-800-750-0750
www.cswmft.ohio.gov

To file a grievance against a nurse, contact:

Nursing Education and Nurse Registration Board
17 South High Street, Suite 400
Columbus, Ohio 43215-7410
(614) 466-9564
www.nursing.ohio.gov

To file a grievance against a psychologist, contact:

Ohio Psychological Association
395 East Broad Street, Suite 310
Columbus, Ohio 43215
(614) 244-0034 or (800) 783-1983
www.ohpsych.org

To file a grievance against psychiatrists or other medical doctors, contact:

Academy of Medicine of Cleveland
6100 Oaktree Blvd suite 440
Cleveland Oh 44131
216-520-1000
www.amcnoma.org

State Medical Board
30 East Broad Street, 3rd Floor
Columbus, Ohio 43215
(614) 466-3934
www.med.oh.gov

For specialized legal advice and representation and to file a grievance against State-operated public mental health services:

Disability Rights Ohio
50 West Broad St., Suite 1400
Columbus, Ohio 43215-5923
(614) 466-7264
(800) 282-9181 (Toll-free in Ohio only)
Ohio Relay at 1-800-750-0750
www.olrs.ohio.gov

Public Hospitals:

Patient Representative
Customer Services
MetroHealth Medical Center
2500 MetroHealth Drive
Cleveland, Ohio 44109
(216) 778-7800
www.metrohealth.org

Client Rights Officer
St. Vincent Charity Hospital Psychiatric Emergency Room
2351 East 22nd Street
Cleveland, Ohio 44115
(216) 861-6200
www.svch.net

Client Rights Officer
Northcoast Behavioral Healthcare System, South Campus
1756 Sagamore Road
Northfield, Ohio 44067
(330) 467-7131
www.mh.state.oh.us

Other Resources Agencies & Outside Entities:

Legal Aid Society of Cleveland
1223 West 6th Street
Cleveland, Ohio 44113
(216) 687-1900
www.lasclev.org

Governor's Council on People with Disabilities
400 E. Campus View Blvd.
Columbus, Ohio 43235-4604
(800) 282-4536 x1394
www.gcpd.ohio.gov

Office of the Attorney General
30 East Board Street, 14th Floor
Columbus, Ohio 43215
(800) 282-0515
www.ohioattorneygeneral.gov

Office for Civil Rights, Centralized Case Management Operations
US Department of Health and Human Services
200 Independence Avenue S.W.
Room 509F, HHH Building
Washington D.C. 20201
800-368-1019
TDD 800-537-7697

Ohio Psychiatric Association
3510 Snouffer Rd suite 101
Columbus Oh 43235
614-763-0040
www.ohpsych.org

Citizens of Cuyahoga County Ombudsman Office
2800 Euclid Avenue #650
Cleveland, OH 44115
(216) 696-2710
www.cuyahoga.oh.us

Ohio Resources Center for Deafness
500 Morse Road
Columbus, OH 43215
614-781-6670
www.columbuscolony.org

U.S. Equal Employment Opportunity Commission
Cleveland Field Office
Anthony J. Celebrezze Federal Building
1240 East 9th Street, Suite 3001
Cleveland, OH 44199
(800) 669-4000 – TTY: (800) 669-6820
www.eeoc.gov

President's Committee on Employment of People with Disabilities
1331 F. Street NW, 3rd Floor
Washington, DC 20004
(202) 376-6200 – voice or (202) 376-6205 – TDD
www.acf.hhs.gov

Office of the Americans with Disabilities Act
U.S. Department of Justice
Civil Rights Division
Disability Rights Section - NYA
950 Pennsylvania Avenue NW, 3rd Floor
Washington, DC 20530
(800) 514-1301 – voice or (800) 514-0383 – TDD
www.usdoj.gov/crt/ada

Cuyahoga County Job and Family Services
Virgil Brown Neighborhood Family Service Center
1641 Payne Ave
Cleveland Oh 44114
Agency Ombudsman -216-802-2810

Emerald Development & Economic Network, Inc (EDEN)
7812 Madison Ave
Cleveland OH 44102
Client Rights Officer – Kim DiCillo
216-961-9690

Spanish American Committee
4407 Lorain Ave
Cleveland Oh 44102
216-961-2100
www.spanishamerican.org

Cuyahoga County Veterans Service Commission
1849 Prospect Ave Suite 150, Cleveland Oh 44115
216-698-2600
www.vscmail@cuyahogacounty.us