



RECOVERY & PREVENTION

R E S O U R C E S

of Delaware and Morrow Counties

Client Orientation Handbook

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WELCOME

The effects of alcohol and other drug problems – job, legal and interpersonal issues, health, family, and financial problems – are somber for individuals and communities. Recovery & Prevention Resources of Delaware and Morrow Counties (RPR) is committed to provide an array of effective behavioral health services, with an emphasis on providing the highest quality alcohol and other drug treatment, intervention, prevention and education services. Extending our preventive efforts, we also provide community, workplace and school-based education programs.

At RPR, qualified, experienced and caring professionals work as a multi-disciplinary team to address each client's needs and ensure privacy and confidentiality. Our staff includes licensed therapists, social workers, chemical dependency counselors, medical professionals, and certified prevention specialists. Recovery & Prevention Resources meets and exceeds both state and national standards of care and is accordingly certified by the Ohio Department of Mental Health and Addiction Services, and is accredited by the Commission on Accreditation of Rehabilitation Facilities.

RPR is a private, non-profit organization whose services are made possible through support from the Ohio Department of Mental Health and Addiction Services, the Delaware – Morrow Mental Health & Recovery Services Board, Medicaid, the United Way of Morrow County, private insurance reimbursements and client, sliding-scale fee basis.

We welcome you as a client of RPR. We desire to provide professional services in a time and cost efficient manner, while rendering the highest quality of care possible.

Civil Rights

It is the policy of RPR to treat all clients without regard to race, ethnicity, age, color, religion, creed, gender, national origin, sexual orientation, veteran status, financial condition, handicap, developmental disability, HIV infection, AIDS-related complex or AIDS. The same eligibility requirements are applied to all clients and potential clients; and clients are assigned without regard for these identifiers, conditions or circumstances. None of these factors shall be cause for distinction in determining eligibility for services or the manner in which services are provided. Any person believing they have been discriminated against has the right to file a complaint.

The Chief Executive Officer of RPR has designated Client Rights Representatives who have the responsibility to function as Civil Rights Coordinators with respect to allegations of discrimination by clients or potential clients of RPR. The Civil Rights Coordinators designated by the Chief Executive Officer are:

Kenton Beachy, M.A.
Chief Operating Officer
Recovery & Prevention Resources
118 Stover Drive
Delaware, Ohio 43015-8601
(740) 369-6811 (Voice and TDD)

Carol Kasha-Ciallella, M.S. Ed., PCC, LICDC
Clinical Director
Recovery & Prevention Resources
118 Stover Drive
Delaware, Ohio 43015-8601
(740) 369-6811 (Voice and TDD)

Clients or potential clients who desire external assistance in filing a complaint may obtain such additional assistance in filing a complaint from:

Delaware-Morrow Mental Health & Recovery
Services Board
40 North Sandusky Street Suite 301
Delaware, Ohio 43015
(740) 368-1740

Ohio Legal Rights Services
50 West Broad Street 14th Floor
Columbus, Ohio 43215
(800) 282-9181

Ohio Department of Mental Health and Addiction
Services
30 East Broad Street 36th Floor
Columbus, Ohio 43215-3430
(614) 466-2596 (614) 752-9696 (TTY)

US Department of Health and Human Services
Civil Rights Regional Office Region V
300 South Wacker Drive
Chicago, Illinois 60606
(312) 886-2359 (312) 353-5693 (TDD)

Client Rights

All individuals requesting services from RPR have a right to receive such services without regard to race, ethnicity, age, color, religion, creed, gender, national origin, sexual orientation, veteran status, financial condition, handicap or disability, HIV infection - whether asymptomatic or symptomatic, AIDS-related complex or AIDS. No distinction will be formulated in determining eligibility for participation in services provided by RPR based on any of these identifiers, conditions or circumstances.

All individuals requesting services from RPR shall receive a Statement of Client Rights as part of the intake and initial orientation process. Said statement shall conform to all applicable regulations issued by State, Federal and other funders; and shall include, but not be limited to:

1. The right to be treated with consideration and respect for one's personal dignity, autonomy and privacy.
2. The right to receive services in the least restrictive feasible environment as defined in one's treatment plan.
3. The right to be informed of one's own condition, diagnosis, treatment and prognosis; and to obtain the name and specialty of the staff member primarily responsible for one's care. This information will be provided in terms and language understandable by the client.
4. The right to be informed of services available through Recovery & Prevention Resources; including recommended, proposed or current services, treatment or therapies and alternatives.
5. The right to consent to or refuse any service, treatment or therapy upon full explanation of the expected consequences of such consent or refusal. A parent or legal guardian may consent to or refuse any service, treatment or therapy on behalf of a client who is a minor.
6. The right to a current, written, individualized treatment plan that addresses one's own alcohol and other drug issues, recovery planning, mental health, physical health, social and economic needs, and that specifies the delivery of appropriate and adequate services as available either through Recovery & Prevention Resources or by referral.
7. The right to active and informed participation in the development, review, revision and update of one's individualized treatment plan.
8. The right to receive a copy of one's individualized treatment plan.
9. The right to freedom from unnecessary or excessive medication.
10. The right to freedom from unnecessary physical restraint or seclusion.
11. The right to participate in any appropriate service available through Recovery & Prevention Resources, regardless of refusal of one or more other services, treatments or therapies, or regardless of relapse from previous treatment in that or another service, unless there is a valid and specific necessity which precludes or requires the client's participation in other services. Any such necessity shall be explained to the client and documented in the client's clinical record.
12. The right to be informed of any unusual or hazardous treatment procedures.
13. The right to refuse any unusual or hazardous treatment procedures.
14. The right to be advised of and refuse observation by others and by techniques such as one-way vision mirrors, tape recorders, video recorders, television, movies or photographs.
15. The right to consult with independent treatment specialists or legal counsel at one's own expense.
16. The right to a maximum amount of privacy consistent with the effective delivery of clinical services. This includes, but is not restricted to, 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.
17. The right to have access to one's own treatment record, unless access to particular identified items of information is specifically restricted for clear treatment reasons. It is understood that *clear treatment reasons* is defined to mean severe emotional damage to the client of such nature that dangerous or self-injurious behavior is an imminent risk. In such instances, the person restricting a client's access to information shall explain to the client and other persons authorized by the client the factual information about the client that necessitates said restriction. All such restrictions must be clearly documented in the client's clinical record, and must be reviewed annually. Any person authorized by the client has unrestricted access to all information. When access to one's treatment record is requested, clients shall be informed in writing of agency policies and procedures for viewing or obtaining copies of one's treatment record.
18. The right to be informed of the reason(s) for discontinuation or denial of services, including the right to be informed of the reason(s) for terminating participation in a program, and to be involved in planning for the consequences of such events.
19. The right to treatment; and the right not to be discriminated against in the delivery of services on the basis of race, ethnicity, age, color, religion, creed, gender, national origin, sexual orientation, veteran status, financial condition, handicap or disability, HIV infection - whether asymptomatic or symptomatic, AIDS-related complex or AIDS.

20. The right to know the cost of services provided by Recovery & Prevention Resources.
 21. The right to be informed of all rights promptly at the time of admission for services.
 22. The right to exercise all rights without reprisal in any form.
 23. The right for clients with limited abilities to speak and communicate in English to access a qualified interpreter at no additional cost to themselves.
 24. The right for clients with hearing or sensory impairments to access a qualified sign language interpreter and other auxiliary aids at no additional cost to themselves.
 25. The right to obtain information about any relationship between Recovery & Prevention Resources and other health care or related institutions when such relationships would involve the client's care.
 26. The right to file a grievance in accordance with agency procedures should any client perceive their client rights to be violated;
 27. The right to receive oral and written instructions explaining the procedure for filing a grievance.
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Client Grievances

RPR acknowledges that differences or disagreements may arise during the treatment process, and wishes to resolve such instances in an expeditious and prudent manner for the benefit of the client, agency and all affected parties. Therefore, the following protocols have been established:

The Chief Executive Officer of RPR will designate Client Rights Representatives who have the responsibility for overseeing the client grievance process, and will provide such assistance as may be necessary for a client to file a grievance.

The Client Rights Representatives designated by the Chief Executive Officer, are:

Carol Kasha-Ciallella, M.S. Ed., PCC, LICDC-CS
Clinical Director
Recovery & Prevention Resources
118 Stover Drive
Delaware, Ohio 43015-8601
(740) 369-6811 (Voice and TDD)

Kenton Beachy, M.A.
Chief Operating Officer
Recovery & Prevention Resources
118 Stover Drive
Delaware, Ohio 43015-8601
(740) 369-6811 (Voice and TDD)

Either of the Client Rights Representatives may also be contacted at:

Recovery & Prevention Resources
950 Meadow Drive Suite C
Mt. Gilead, Ohio 43338
(419) 947-4055

The Client Rights Representatives will be available during routine agency operating hours, 8:30 AM to 5:00 PM, to meet with any client desiring to initiate the grievance procedure. If the Client Rights Representatives are unavailable when a client makes contact with RPR to initiate a grievance, either the Client Rights Representative or, in the case of extended unavailability, the Chief Executive Officer will make contact with the client within three (3) working days.

In the event that a client articulates a grievance or poses questions about filing a grievance, staff members of RPR are responsible to provide the client with the name and availability of the appropriate Client Rights Representative. Should either of Client Rights Representatives be the subject of a grievance, the Chief Executive Officer will function as an alternate Client Rights

Representative and will work with the client to explain and offer assistance with the grievance procedure.

Upon expressing to the Client Rights Representative one's desire to file a grievance, the complainant is entitled to a private conference with the Client Rights Representative. Such conference shall be scheduled by the Client Rights Representative within three (3) working days of the complainant's request. During this conference, the Client Rights Representative will provide a copy of the RPR Client Grievance Policy and will review and explain said policy.

The Client Grievance Policy serves as notification that all grievances must be submitted in writing, and that the Client Rights Representative is available to assist the complainant in preparing a written grievance as may be necessary.

All written client grievances are to be submitted to the Client Rights Representative, with an additional copy provided to the Chief Executive Officer, and should include the following information:

- The date, time and location at which the grievance or alleged violation of client rights occurred;
- The names or description of individuals involved in the incident or situation being grieved;
- A brief narrative of the incident or complaint;
- The name of the client filing said grievance;
- The date of grievance filing verified by the signatures of both the complainant and the Client Rights Representative. If a third party files the grievance on behalf of the client, the signature of that third party should also be included with the date of grievance filing.

The Client Rights Representative shall investigate the grievance and provide the complainant with a signed and dated summary of any findings and the proposed resolution within twenty-one (21) days of the written filing. A copy of any such findings will also be provided to the Chief Executive Officer. Any extenuating circumstances indicating extension of this twenty-one (21) day time period must be documented with written notice of such extension provided to the complainant.

If the proposed resolution is not satisfactory to the complainant, they, accompanied by the Client Rights Representative, will meet with either the Chief Executive Officer or Associate Director to promote resolution of the grievance. Such meeting must be requested within five (5) working days of the notification of findings and will be scheduled within five (5) working days of the request. Following this meeting, the Chief Executive Officer or Associate Director will investigate the complaint and will render a decision within five (5) working days from the time of the meeting.

Following receipt of a grievance from a client or another person acting on behalf of a client of RPR, within three (3) working days the Client Rights Representative will acknowledge receipt of said grievance in writing to the person responsible for the filing. The written acknowledgment will include, at minimum, the following information:

- Date the grievance was received;
- Summary of the grievance;
- An overview of the grievance investigation process;
- The timetable for completing investigation of the grievance and notifying the complainant of proposed resolution;
- The contact name, address and telephone number of the Client Rights Representative.

In addition to this initial acknowledgment, written notification and explanation of the disposition of any grievance will be supplied to the client at each stage of the grievance process within the time frames specified in this policy.

Any client who so desires may also file a grievance at any time with outside organizations that include, but are not necessarily limited to:

Delaware-Morrow Mental Health & Recovery
Services Board
40 North Sandusky Street Suite 301
Delaware, Ohio 43015
(740) 368-1740

Ohio Legal Rights Services
50 West Broad Street 14th Floor
Columbus, Ohio 43215
(800) 282-9181

Ohio Department of Mental Health and Addiction
Services
30 East Broad Street 36th Floor
Columbus, Ohio 43215-3430
(614) 466-2596 (614) 752-9696 (TTY)

US Department of Health and Human Services
Civil Rights Regional Office Region V
300 South Wacker Drive
Chicago, Illinois 60606
(312) 886-2359 (312) 353-5693 (TDD)

Confidentiality

Confidentiality is a fundamental component of quality clinical services. It is therefore the policy of Recovery & Prevention Resources to safeguard the client right to privacy with respect to confidential information disclosed or revealed in the therapeutic setting.

The full text of the most recent federal confidentiality regulations will be available through the Chief Executive Officer. In summary, these regulations state:

- Program staff shall not convey to a person outside of the program that a client attends or receives services from the program or disclose any information identifying a client as an alcohol or other drug services client unless the client consents in writing for the release of information, the disclosure is allowed by a court order, or the disclosure is made to qualified personnel for a medical emergency, research, audit or program evaluation purposes.
- Federal laws and regulations do not protect any threat to commit a crime, any information about a crime committed by a client either at the program or against any person who works for the program.
- Federal laws and regulations do not protect any information about suspected child abuse or neglect being reported under state law to appropriate state or local authorities

Any violation of client confidentiality, or knowledge of such violation, shall be immediately reported to the affected employee's direct supervisor; who will immediately inform the Chief Executive Officer.

Violation of client confidentiality by a staff member will result in disciplinary action that may include termination of employment. Violation of one client's confidentiality by another client may result in termination of services to the client who initiated the breach.

With the exception of situations previously referenced in this policy, and more fully described in the federal confidentiality regulations, confidential information held by RPR may only be released or disclosed if the client in question has properly executed an Authorization to Disclose Confidential Information form. Said information to be released or disclosed may include only information accumulated through the client's involvement with RPR. Reports from other organizations may be released only by the organization from which the report originated, unless the client has signed a specific Authorization to Disclose Confidential Information form that allows RPR to redisclose such information.

Confidential client information may be disclosed among employees of the different departments comprising RPR only to the extent necessary for said employees to perform the expected functions of their employment.

Treatment Services

Recovery & Prevention Resources of Delaware and Morrow Counties (RPR) provides an array of outpatient alcohol and other drug treatment services which span Non-Intensive Outpatient Treatment and Intensive Outpatient Treatment.

In addition, RPR also provides numerous services that are classified as “Community Services” which include Intervention, Outreach and Training as well as “Prevention Services” which include Alternatives, Community-Based Process, Education, Environmental, Information Dissemination and Problem Identification and Referral.

A description of the services provided includes:

Assessment: Assessment is the evaluation of an individual to determine the nature and extent of their alcohol or other drug problems or addiction.

Case Management: Case management services are provided to assist and support individuals in gaining access to needed medical, social, educational and other services essential to meeting basic human needs. Case management services may include interactions with family members, significant others and/or other individuals or entities. Major components of case management services include coordinating assessments, treatment planning and crisis assistance services, linkage and training for clients in the use of basic community resources, and monitoring overall service delivery. Case Management services are available to all active, inactive, or potential clients of RPR.

Crisis Intervention: Crisis intervention means a face-to-face or on a telephone response to a crisis or emergency situation experienced by an individual, family member or significant other. Crisis intervention activities include efforts to provide services necessary to stabilize the crisis or emergency situation.

Group Counseling: Group counseling means to assist two or more individuals in achieving treatment objectives. This occurs through the exploration of alcohol and other drug problems or addiction and their ramifications. Group counseling involves an examination of attitudes and feelings, consideration of alternative solutions and decision making, and the discussion of didactic material with clients. The client to counselor ratio for group counseling shall not be greater than 12:1.

Individual Counseling: Individual counseling involves a face-to-face encounter between a client and a counselor. Individual counseling focuses on assisting an individual to achieve treatment objectives through the exploration of alcohol and other drug problems or addiction and their ramifications. Individual counseling involves an examination of attitudes and feelings, consideration of alternative solutions and decision-making, and the discussion of didactic material with clients.

Laboratory Urinalysis: Laboratory urinalysis means the testing of an individual’s urine specimen to detect the presence of alcohol or other drugs.

Intensive Outpatient: Intensive Outpatient Program (IOP) means an outpatient alcohol and other drug treatment service which operates for at least eight (8) hours per week with treatment services provided at least three (3) days per week.

The Intensive Outpatient Program provided by Recovery & Prevention Resources at its Delaware site presently includes 10.5 hours of group counseling services per week, provided over four (4) days. In addition, IOP services may also be supplemented by assessment services, individual counseling, case management and crisis intervention services. Client education about alcohol and other drug addiction is included as a routine component of the group counseling services provided to these clients.

Medical Somatic: Medical somatic services mean medical services, medication administration services and the dispensing of medications. Medical services can include, but are not limited to health care examinations, health assessments, taking vital signs and reviewing laboratory findings.

Medication Assisted Treatment: Medication assisted treatment means alcohol and other drug addiction services that are accompanied by medication approved by the United States Food and Drug Administration for the treatment of drug addiction, prevention of a relapse of drug addiction, or both.

Transportation: Transportation services include various options for clients participating in treatment programs provided by Recovery & Prevention Resources. These options include, but are not necessarily limited to, utilizing the services of the Morrow County Transportation Collaborative (MCTC) or Delaware Area Transit Authority (DATA) and local cab services to transport clients to scheduled treatment appointments, utilizing other public transportation services as necessary and indicated, and providing gas vouchers for female clients participating in RPR's gender specific treatment program, *Breaking the Cycle*.

Child Care: As part of its commitment to remove barriers and enhance the accessibility of its treatment services, Recovery & Prevention resources makes child care available for its treatment clients during regularly scheduled times of high service utilization, particularly during the meeting times for RPR's gender specific treatment program, *Breaking the Cycle*.

Other Behavioral Health Services

Mental Health Assessment: Mental health assessment is a clinical evaluation that involves gathering information to assess client needs and functioning to determine appropriate treatment based on identification of the presenting problem, evaluation of mental status, and formulation of a diagnostic impression. The outcome of mental health assessment is to determine the need for care, and recommend appropriate services or treatment. Results of the mental health assessment shall be shared with the client.

Behavioral Health Counseling and Therapy – Group: In a group treatment modality, behavioral health counseling and therapy service means interaction with two or more clients in which the focus is on treatment of the clients' mental illness or emotional disturbance. Sessions are time-limited and structured to work toward the attainment of mutually defined goals as identified in the individual service plan.

Behavioral Health Counseling and Therapy – Individual: Behavioral health counseling and therapy service means interaction with a client in which the focus is on treatment of the client's mental illness or emotional disturbance. Sessions are time-limited and structured to work toward the attainment of mutually defined goals as identified in the individual service plan. If the client is a child or adolescent, the interaction may also be with the family members and/or parent, guardian and significant others when the intended outcome is improved functioning of the child or adolescent and when such interventions are part of the individual service plan.

Pharmacologic Management: Pharmacologic management service is a psychiatric/mental health/medical intervention used to reduce, stabilize or eliminate psychiatric symptoms with a goal of improved

functioning, including management and reduction of symptoms. The purpose of pharmacological management is to:

- Address psychiatric needs identified in the mental health assessment and documented in the client’s individual service plan;
- Evaluate the prescription, administration, monitoring, and supervision of medication;
- Inform individuals and family regarding medication and its actions, effects and side effects so that they can effectively participate in decisions concerning medication that is prescribed for them;
- Assist individuals in obtaining prescribed medications, when needed and provide follow-up, as needed.

Pharmacologic management service shall consist of performance of a psychiatric/mental health examination or prescription of medications and related processes as either relates to the client’s psychiatric needs, and as clinically indicated. Related process can include:

- Consideration of allergies, substance use, current medications, medical history, and physical status;
- Behavioral health education to individuals or families about the purpose, risks, side effects, and benefits of the medication prescribed;
- Collaboration with the individual or family, including their response to the education, as clinically indicated. The method of delivery of education can be to an individual or group of individuals.

Community Psychiatric Supportive Treatment (CPST): Community Psychiatric Supportive Treatment services focus on a client’s ability to succeed in the community; to identify and access needed services; and to show improvement in school, work and family and integration and contributions within the community. Components of CPST services include, but are not limited to ongoing assessment of client needs, coordination of the individualized service plan, assistance accessing natural support systems, and linkage and service coordination with formal community services and systems.

In addition to these behavioral health treatment services, with available funding, Recovery & Prevention Resources also provides Consultation, Mental Health Education, and Prevention.

Hours of Operation

Recovery & Prevention Resources provides primary services from site locations in Delaware and Morrow Counties. Services are also provided on-site at a variety of community locations based on need, professional agreements and availability of space. RPR service locations are:

Site	118 Stover Drive Delaware, Ohio	Meadow Center 950 Meadow Center Drive Suite C Mt. Gilead, Ohio
Hours of Operation	Monday 8:00 AM – 8:00 PM Tuesday 8:00 AM – 8:30 PM Wednesday 8:00 AM – 8:30 PM Thursday 8:00 AM – 8:30 PM Friday 8:00 AM – 5:00 PM	Monday 8:30 AM – 8:00 PM Tuesday 8:30 AM – 5:00 PM Wednesday 8:00 AM – 7:00 PM Thursday 8:30 AM – 5:00 PM Friday 8:00 AM – 5:00 PM

Access to After-Hour Services

HelpLine of Delaware & Morrow Counties provides after-hour services to the citizens of this area. By contacting 1-800-684-2324 (toll free), you are provided with information and referral guidance, crisis support and hundreds of resources that are available to you 24-hours per day by phone. All calls are confidential.

Code of Ethics

All RPR employees are expected to maintain acceptable job performance and to conduct themselves in a professional and courteous manner. The RPR Board of Directors has approved an ethics policy to address issues in the business provision of service delivery, professional responsibilities, billing, marketing, contractual relationships, admissions practices and human resources. Professional service providers are expected to comply with any codes for professional conduct or ethical behaviors adopted by their respective licensure or certification authorities.

Financial Obligation, Fees, Financial Arrangements

Because it is the intention of RPR to provide services to any resident of Delaware and Morrow Counties regardless of their ability to pay, it is necessary to determine by what means reimbursement for services is most appropriate on an individual basis. The following priority has been established for the manner in which fees can be paid:

1. Health Insurance – It is the client’s responsibility to verify the extent of any anticipated insurance coverage and to provide properly completed and endorsed insurance claim forms prior to services being provided. Any billable costs not reimbursed in full by a client’s health insurance are considered out of pocket expenses and are to be reimbursed to RPR. Reimbursement for copayments is expected at the time of each session.
2. Medicaid – Documentation of Medicaid coverage must be presented prior to services being provided and updated medical cards are to be provided on a monthly basis.
3. Sliding Fee Scale – If health insurance or Medicaid coverage is not available, a fee for services will be determined using gross family monthly income and number of dependents as determinants. Once a fee for services has been established, clients are expected to provide payment at the time of each session.

It is the policy of RPR to charge a \$15.00 missed appointment fee to the account of any client who either fails to attend, or arrives more than 15 minutes late for a scheduled appointment. Should this occur, the \$15.00 fee must be paid before scheduling a new appointment. If it is necessary to cancel an appointment, a phone call to the agency prior to your appointment will prevent this fee being charged to your account.

Site Maps – Delaware and Mt. Gilead

Maps are posted at various locations at both the Delaware and Mt. Gilead sites of RPR. On these maps are identifiers for Fire Suppression equipment, First Aid kits, as well as “safe areas” in the case of violent weather.

Smoking Policy

Smoking and the use of tobacco products are at all times prohibited in the RPR offices, facilities, and vehicles owned, leased or rented by the organization. This policy is to protect the health and safety of all employees, clients, family members or significant others of clients being served, and visitors to RPR.

Use of Legal / Illegal Drugs Brought On RPR Site

The manufacture, distribution, dispensing, possession or use of alcohol or other drugs, except for lawfully obtained prescription medications and over the counter medications, is prohibited in the workplace of Recovery & Prevention Resources.

Weapons Policy

Firearms and other deadly weapons of any kind are strictly forbidden on the premises of RPR. The term “premises” includes all offices, buildings and property that are operated as part of the organization. This prohibition shall not prevent firearms and other deadly weapons from being kept in vehicles parked on agency property as long as the firearm is properly stored according to Ohio law. This policy applies to clients, visitors, workforce members, and any other persons entering an RPR facility for any reason. Recovery & Prevention Resources intends to prosecute anyone who knowingly violates this prohibition and refuses to leave after being informed of the prohibition. This policy shall not prohibit the following persons from carrying a firearm on RPR premises: (1) law enforcement officers, and (2) probation/parole officers.

If a handgun, or other deadly weapon, is discovered on a client, such as when a client presents in an emergency, the personnel member discovering the handgun or other deadly weapon should immediately inform the client of the organization’s policy and immediately notify the Chief Executive Officer or other supervisor.
