

NOWCAP SERVICES
2024 PARTICIPANT HANDBOOK



NOWCAP SERVICES' MISSION STATEMENT
"Creating Opportunities for All People
With Disabilities!"
Since 1985

NOWCAP SERVICES PARTICIPANT HANDBOOK

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WELCOME TO **NOWCAP SERVICES!**

Thank you for choosing NOWCAP Services. Our job is to provide you with quality, choice-driven services and supports to assist you in improving your quality of life!

NOWCAP Services is proud to provide a number of distinct services and supports for persons with disabilities in Casper and Rock Springs, Wyoming.

NOWCAP Services is very selective when choosing personnel who provide support to our participants. Before completing an application, all job candidates must view a professionally developed video where direct-care personnel communicate the qualities that are necessary when working with people with disabilities. Then, prior to hire, all employees must complete a comprehensive background check including; state and federal fingerprinting, a drug screen (including random screenings throughout employment), and documentation from the Department of Motor Vehicles indicating a clean driving record to be a driver. After hire, all personnel are trained in New Employee Orientation, CPR, First Aid, CPI (Crisis Prevention Intervention), Medication Assistance, Safe Driver Training, Personal Care Training and attend organizational classroom training, individual on-site training, and complete on-going training requirements. Training that is reviewed includes: Effective teaching techniques, individualized training and services, community expectations, creating and using natural supports, maintaining participant and organizational Health and Safety and other trainings to prepare employees for success. Each employee agrees to endorse and defend the organization's code of ethical conduct and adhere to the statement of quality. If you are ever concerned about any of our employees, please contact your local office or Dawn Lacko, Executive Director, in Casper at 307-237-9146.

This handbook should be helpful in explaining to you NOWCAP Services' programs and philosophies. Please keep this handbook as a resource that you can refer to whenever you have questions. We are proud of what we do and are happy that you have decided to become part of the NOWCAP Services FAMILY!



THE WHO, WHAT, WHY'S AND HOW'S OF NOWCAP SERVICES

WHO IS NOWCAP SERVICES?

NOWCAP Services is a private, not-for-profit organization that provides services and supports to children and adults with intellectual disabilities and co-occurring mental illness and/or medical needs and adults with acquired brain injuries.

NOWCAP of Wyoming, Incorporated is our corporate office, which is based out of Worland, Wyoming. NOWCAP of Wyoming provides human service programs and has done so for over 50 years!

HOW IS NOWCAP SERVICES FUNDED?

NOWCAP Services secures funds primarily through the Home and Community-Based Waiver for adults, children, and adults with acquired brain injuries. Additional funding sources may include; school districts, Division of Vocational Rehabilitation (DVR), Worker's Compensation, grants, private pay or other sources.

WHAT SERVICES DOES NOWCAP SERVICES PROVIDE?

NOWCAP Services has a variety of programs to meet the needs of individuals with intellectual disabilities and acquired brain injuries. Services can include: a variety of home-based services including in a group home, a family home or a participant's private apartment and community integrated services.. Our programs may partner with other Skilled Nursing waiver providers if nursing services are needed. NOWCAP Services also provides intermittent services such as Social Security assigned Representative Payee.

WHAT KIND OF TRAINING DOES NOWCAP SERVICES PROVIDE?

NOWCAP Services provides skills training and behavior modification specific to each participant, dependent upon their personal needs, preferences, and life-long goals. Additionally, NOWCAP Services assists participants to access community resources, recreate, develop and maintain friendships, and participate in events such as concerts, sporting events, Special Olympics, church, vacations, etc.

WHEN AND WHERE CAN I GET SERVICES AND TRAINING?

NOWCAP Services provides services and training based on the participant's individualized needs and wants. This is determined by the participant's Interdisciplinary Team and is described in the participant's Individualized Plan of Care. NOWCAP Services takes an individualized approach in service hours and supports. Hours and locations of supports are based upon the participant's goals and preference.

WHO OVERSEES NOWCAP SERVICES?

NOWCAP Services is accredited by CARF (Commission on the Accreditation of Rehabilitation Facilities) at the highest level of accreditation possible. NOWCAP Services has met this level of accreditation since 1986.

NOWCAP Services is also reviewed by: The Wyoming Department of Health, Protection and Advocacy Systems, Inc., Centers for Medicare and Medicaid, Department of Family Services , Department of Housing & Urban Development (HUD), Social Security Administration, OSHA, Department of Labor, Source America, families, guardians, and participants.

HOW LONG HAS NOWCAP SERVICES BEEN IN EXISTENCE?

NOWCAP of Wyoming, Incorporated has been in existence since 1965, but NOWCAP Services was granted the state contract to provide services to people with developmental disabilities in Casper in 1985.

HOW DO I BEGIN SERVICES AT NOWCAP SERVICES?

NOWCAP Services will review your needs, choices, and preferences through an Application for Services as well as discussion with you and/or your family, reviewing evaluations such as psychological reports and current medical reports, and will evaluate our ability to provide services so that we can meet your needs in a safe and proper manner. A member or members of the NOWCAP leadership team will provide an onsite visit to meet interested participants and to visit with their families, and/or providers to develop a greater sense of the participant and their needs. A funding source must be secured, such as the Home and Community-based Waiver for adults and children with developmental disabilities or adults with acquired brain injuries. NOWCAP Services does not traditionally have a waiting list. Situations such as securing funding from the Medicaid Waiver, planning successful transitions, and waiting for desired housing could delay your start at NOWCAP Services. If a delay in services is necessary we at NOWCAP Services will attempt to make sure your needs are met through referral to other resources if needed.

HOW DO I HELP DESIGN MY SERVICES AT NOWCAP SERVICES?

You are in charge! NOWCAP Services utilizes a person centered approach to developing services. You play an important role in sharing your expectations, designing and planning your Individual Plan of Care, the services you receive, the goals you want to achieve, and assessing potential risks and concerns. Your team, which consists of your Case Manager, Guardian, family members, staff that work with you and any one you would like to be part of your team assist you in developing a plan that fits your needs, wants, goals and preferences.



NOWCAP SERVICES CODE OF ETHICS

POLICY:

NOWCAP Services has established standards of ethical conduct to direct the actions of the governing board of directors and staff members. These standards apply to business and marketing practices of the organization, professional responsibilities, and the supports provided in the professional relationship with participants, employees, colleagues, guardians and family members of participants, related agencies and professionals, and the community at large. All applicable parties shall abide by these standards and carry out the spirit and intent by which it was created.

GUIDING PRINCIPLES OF THE ORGANIZATION

Mission and Program

NOWCAP Services operates to accomplish a stated mission statement – “Creating Opportunities for All People with Disabilities”. All stakeholders shall work towards achieving the organization’s mission through effective, efficient, innovative and choice-driven services. Resources will be devoted towards achieving the mission through appropriate allocation and sound fiscal practices.

NOWCAP Services’ Statement of Quality is the core belief that guides the actions and attitudes of the organization. It represents the core priorities in the organization’s culture, including what drives those priorities and how they are truly reflected within the organization.

- *A promise made is a promise kept.*

NOWCAP Services builds and maintains trusting relationships through being honest and acting with integrity.

- *Every person is unique.*

NOWCAP Services creates individualized opportunities for people with disabilities.

- *Teamwork is the key to each person’s success.*

NOWCAP Services’ employees are dedicated to meeting the needs of each person who is served and treat every stakeholder in a professional and ethical manner.

- *Together everyone achieves more.*

NOWCAP Services values the positive relationships we foster within the communities we serve.

Governing Body

NOWCAP Services is governed by an elected, volunteer board of directors that consist of individuals who are committed to the mission of the organization. The board determines the mission of the organization, establishes management policies and procedures, assures that adequate human resources and financial resources are available, and actively monitors the performance of the organization.

PROCEDURES:

Business – Financial and Legal

NOWCAP Services has sound fiscal management practices and complies with all legal and regulatory requirements. Internal and external reviews of financial records are conducted regularly through transparent periodic reviews. Results of reviews are shared with funding resources, regulatory agents and anyone else upon request. All personnel are expected to adhere to all regulatory requirements of documentation for proper reimbursement of Medicaid funds to ensure the organization is a good steward of public funds.

Marketing

NOWCAP Services will act truthfully and with integrity in regards to all marketing materials whether it be print, video, or through social media. All information shared or conveyed will be based upon fact, and with the mission of the organization at the forefront of the message. No images or names of individuals served will be shared for marketing purposes without the express written consent of the individual or their legal guardian. All employees will also consent in writing to the use of their image or name in marketing or social media campaigns prior to their use by the organization.

Contractual Relationships

Contractual relationships will be honored as to the outlined intent and purpose of the agreement. Prior to entering into a contractual relationship with an organization, business or individual, a review will take place to ensure no conflicts of interest exist and that all requirements of the contract can be met by both parties.

Conflicts of Interest

All stakeholders will act in the best interest of the organization and will give preference to professional responsibility over personal interests or the interests of third parties. The organization has conflict of interest policies in place to avoid any current or future conflicts.

Acceptance of gifts or offering of gratuities, gifts or favors for current or future participants and/or guardians is prohibited.

Use of Social Media

Employees are discouraged (within the scope of current employment law) from expressing opinions or providing information on social media (such as Facebook, Twitter, or other social media sites) which would represent NOWCAP Services in an unprofessional or negative manner, or breaches confidentiality, such as posting information regarding an individual served in a personal post.

Service Delivery

- Exchange of gifts, money and/or gratuities between guardians, participants and individual staff is strictly prohibited.
- Any personal fundraising by employees or participants must be reviewed by the Risk Management Committee in an effort for complete transparency.
- Any sales of personal property between employees or participants must be reviewed by the Risk Management Committee in an effort for complete transparency.
- All employees must maintain professional relationships with participants at all times. NOWCAP Services wants to encourage and provide safe accessibility of staff to participants while at the same time ensuring the safety and confidentiality of NOWCAP Services facilities, programming and participants.
- Permission to be a legal witness on a legal document for participants and/or guardians must be received prior to signing any legal document.

Professional Responsibilities

- Participants of NOWCAP Services will be treated with dignity and respect at all times. No obscene or abusive language or behavior will be tolerated on any NOWCAP Services premises. (Violations will be reported to law enforcement, DFS, BHD, and P&A if applicable).

- Employees are expected to be knowledgeable, professional, and courteous at all times. Personal or professional problems are to be discussed in private and not discussed with individuals participating in services.
- Employees are expected to follow a chain of command (as outlined in the Organizational Chart) when dealing with complex issues such as individual behavior, scheduling, disagreements, etc. It is imperative that employees use honesty, tact, and privacy when airing personal grievances.
- Employees will respect contrary views of both employees and participants and will express these views in a manner which is respectful and appropriate.
- Employees must report immediately to the emergency on-call manager any act or incident in which they believe an individual has been physically, sexually, emotionally, or mentally exploited or abused, including, but not limited to, the personal exchange of property, receiving of gifts or money from an individual or vice versa.
- Employees will not remove items belonging to NOWCAP Services or participants from the premises without the knowledge of the individual and a member of management.

Human Resources

All employees will act in the best interest of the participant(s) and will provide the services and supports that are outlined in the individual plan of care and through the organization's policies and procedures. Employees will treat participants with dignity and respect and will interact with participants in a professional and courteous fashion. Professional boundaries with participants will be adhered to at all times. Any mistreatment of participants will be reported to a member of management immediately and followed up on accordingly.

Organizational Fundraising

NOWCAP Service fundraising practices are maintained on a foundation of truthfulness and responsible stewardship. Fundraising is consistent with the organization's mission statement and dollars raised are strictly used for the benefit of the participants. Employees will refrain from soliciting funds from participants for personal fundraising activities.

Prohibition of Waste, Fraud, Abuse, Other wrongdoing

As per the requirements of the False Claims Provisions of the Deficit Reduction Act of 2005 NOWCAP Services takes seriously any allegation regarding known or suspected financial improprieties, malicious waste, fraud, abuse or other ethical concerns. Any allegation will be researched and reported per legal requirements.

Education on Codes of Ethics

All employees review and acknowledge NOWCAP Services' Code of Ethics upon hire. They also receive further education as the Code of Ethics is discussed during New Employee Orientation. All employees review and sign this document at least annually as part of the performance appraisal process.

Advocacy Efforts and Corporate Citizenship

NOWCAP Services believes that all employees have a role in advocacy for the persons we serve as well as an expectation of corporate citizenship. Providing advocacy through casual or formal means is encouraged for all employees. Participating on local boards, in educational events, providing access to social, legal, or economic advocacy resources are just some of the examples of how NOWCAP Services employees participate. These efforts are documented in NOWCAP Services' Accessibility Plan and/or Cultural Competency and Diversity Plan.

Violations of Code of Ethics

This Code of Ethics is intended to promote the kind of relationship in which services can best be carried out and give guidance in decision-making situations. Any violation to the organization's Code of Ethics will be reviewed by supervisory personnel and action will be dependent upon the severity of the infringement.

Any employee, participant, family member or community member may report a potential violation of the Code of Ethics to a member of management at any time. No particular format or form is required. If a member of management becomes aware of a potential violation of the Code of Ethics the following steps will be followed:

1. A formal review will be conducted in the weekly management meeting. The manager will review the concern within seven (7) days after becoming aware of the potential violation.
2. A member of management will be assigned to follow up and complete written follow up of the concern. This follow up should occur within seven (7) days of the weekly management meeting. Follow up could include any method of documentation including Informal Counseling Reports, Performance Notifications, and/or termination of the employee. Follow up could also include a finding that the violation did not occur.
3. Documentation of potential violations as well as follow up will be maintained in the weekly management meeting notes and/or in personnel files.
4. Any violation of the Code of Ethics leading to termination will be reviewed by the Program Director involved and the Executive Director.

NOWCAP Service takes a no-reprisal or retaliation approach to any reports of potential violations of the Code of Ethics. If any party believes that they are being unfairly treated, retaliated against or ignored that party is to immediately notify the Executive Director and appropriate relief will be brought toward the employee or reporter.



PARTICIPANT RIGHTS, RESPONSIBILITIES, AND RESTRICTIONS

It is the policy of NOWCAP Services to protect and advocate for the rights and responsibilities of program participants. The organization is responsible for creating safe and secure environments, and for providing training to employees to protect the dignity and welfare of all program participants.

Participants and guardians will receive information about their rights and responsibilities upon program entry, and participant rights are reviewed during the plan of care meeting at least annually. Individual participant rights restrictions are identified in each Individual Plan of Care, and must include a restoration plan. Participant rights are reviewed at least two times per year during house meetings in addition to formal team meetings.

Rights reviewed in the Individual Plan of Care include:

Right to Privacy in my home including activities of daily living.

Right to locks on sleeping and living quarter doors.

Right to choose with whom and where to live.

Right to freedom to furnish and decorate my room.

Right to control over my own schedule and activities.

Right to freedom and support to access food at any time.

Right to have visitors at any time and associate with persons of my choice.

Right to communicate with people of their choosing including making and receiving phone calls.

Right to keep and use personal possessions and property.

Right to keep and spend money.

Right to access the community.

Right to be free of physical and mechanical restraints.

Right to be free of chemical restraints.

Additionally, per Home and Community Based Setting federal regulations: “For each service setting within a provider facility, the new HCBS rules specify that a waiver participant receiving services shall have the following rights and freedoms.”

Settings that are integrated within the community so the participant can:

- Receive services in the community to the same degree as those not receiving HCBS;
- Receive services in a setting that is not segregated from people receiving services without disabilities;
- Receive services in a location among other private residences and retail businesses, in an area with consistent traffic patterns and where visitors are present and visit regularly.

A choice in where to live with as much independence as possible, in the least restrictive environment, and:

- Be given opportunities to visit other settings options, such as an apartment, smaller home, fewer roommates, and/or private bedroom;
- Choose a specific roommate or opt for a private unit;
- Have a unit with entrance doors lockable by the individual, with only appropriate staff having keys to doors;
- Access to the typical facilities in a home, such as the kitchen, dining area, laundry, and comfortable seating/lounging areas;
- Have a signed lease or written agreement with tenant/landlord protection to document protections that address eviction processes and appeals comparable to those provided under the jurisdiction’s landlord tenant law;
- Have a setting physically accessible to the individual;
- Have unrestricted access in the setting to roam to common areas.

Exercise Informed Choice and be able to:

- Choose the living environment, services, providers, and types of supports based on one’s needs and preferences;
- Optimize one’s initiative, autonomy, and independence in making life choices, in such activities as daily activities, physical environment, and with whom to interact;
- Design a schedule that meets one’s wishes and is reflected in the person-centered plan;
- Participate in unscheduled and scheduled access to the community, can come and go at any time, and not have a regimented routine.

A setting that ensures one’s rights and protections so the participant can:

- Actively participate in the development of a person-centered plan of care;
- Have dignity and respect, where people communicate and interact respectfully. Staff greet and converse with participants without talking down to them or acting as though the person is not present and talking around them to other staff;
- Expect privacy with protected health information, and know that personal care is conducted privately,

with help only as needed;

- Control personal resources;
- Be free from coercion and restraint;
- Have visitors of their choosing at any time, and access to a private area for visitors;
- Have access to make private calls, text, and email at their preference or convenience;
- Choose when and what to eat, and have access to food at any time, and chooses with whom to eat or to eat alone;
- Have appropriate clothes for their preferences and the weather and activities performed;
- Furnish and decorate their sleeping or living units within the lease or other agreement.

A setting that optimizes personal autonomy so the participant can:

- Engage in community life;
- Engage with friends and family;
- Have support to control their own schedules and activities, and access to activities of their choosing in the larger community;
- Make money by accessing and seeking employment;
- Work in a competitive integrated setting.

Process to Restrict a Right, if needed:

Participants must have all rights honored until there is a reason to restrict a right. Federal rules do have a process for a right to be restricted when and if it is absolutely necessary.

HCB Setting – Improvement Process: Guidance for Providers and Case Managers indicates, “For a participant who has a need for a right to be restricted, the person and their team must make decisions based on that person’s assessed need for a restriction and not base a decision solely on a diagnosis, medical condition, or a possible behavior that happens on occasion. Health and safety concerns addressed by a restriction must not be based on general fears or concerns because of the person’s disability or be based on provider convenience because of other people served in the home.”

Additionally, in order for a right to be restricted, the following eight criteria must be observed in the plan of care as well as the plan of care will address how the team will work to restore any right that has been limited or denied:

- 1) Identify the specific and individualized assessed need.
- 2) Document the positive interventions and supports used prior to any modifications to the person-centered service plan.
- 3) Document less intrusive methods of meeting the need that have been tried but did not work.
- 4) Include a clear description of the condition that is directly proportionate to the specific assessed need.
- 5) Include regular collection and review of data to measure the ongoing effectiveness of the modification.
- 6) Include established time limits for periodic reviews to determine if the modification is still necessary or can be terminated.
- 7) Include the informed consent of the individual.

8) Include an assurance that interventions and supports will cause no harm.

If it is suspected that a participant's rights are being restricted unnecessarily by an employee, then the interdisciplinary team can meet to discuss identified concerns and/or employee training/disciplinary action can occur.

If rights restrictions are requested to be lessened through the interdisciplinary process, then the request will be brought to the risk management team for appropriateness.

If it is suspected that a participant is being harmed in any way, the organization has the legal and ethical responsibility to take whatever action is necessary and required to maintain the health and safety of the participant.

Anyone who reports a concern to the organization or to other entities will not be retaliated against in any way.

BEHAVIOR SUPPORTS

NOWCAP Services promotes and utilizes positive support strategies to assist a participant in modifying targeted behaviors that may be harmful to themselves or others and/or be socially offensive. Positive support strategies include a multi-faceted approach including encouraging positive relationships between the participant and team members including NOWCAP Services staff, encouraging participant involvement and acknowledgement of their involvement throughout the behavior support plan creation and implementation process and finally, therapeutic rapport following any behavioral episodes. NOWCAP Services does not provide services to participants who require physical restraint as part of their Individual Plan of Care.

*NOWCAP Services is a restraint-free facility and does not provide services to participants who require physical, chemical or medication restraints and will not utilize these restraints with any participant.

CONFIDENTIALITY

NOWCAP Services complies with all standards related to confidentiality and HIPAA by protecting and maintaining security of all participant information whether electronic, paper, faxed, or verbal. Information that is used for reporting or billing is shared according to confidentiality guidelines, as well.

Proper releases of information must be obtained, signed, and identified for a specific purpose in order to share information with parties other than the legal representative. Releases of information are in effect for one year from the date of signature unless revoked by the participant or legal guardian in writing.

ACCESS TO PERSONAL RECORDS

NOWCAP maintains a complete and confidential record for each participant. Each participant and/or their guardian may have access to their records with assistance from an authorized agency representative. NOWCAP Services encourages guardians to utilize Therap as a method to monitor services being provided.

PARTICIPANT CRITICAL INCIDENTS

NOWCAP Services has systematic safeguards in place to protect participants from harm and is committed to organizational policies that promote freedom from abuse, neglect, exploitation, abandonment, and humiliation in accordance with the child and adult protection services act (WS 14-3-205, WS 35-20-103). Any participant critical incidents will be reported immediately upon discovery to the Wyoming Department of Health, Protection and Advocacy, Department of Family Services or the Police Department, the Case Manager and the legal guardian after action is taken to address the participant's health, safety, and welfare. Critical incidents include suspected abuse, self-abuse, neglect, self-neglect, exploitation, and/or abandonment. Critical incidents also include the categories of police involvement, crime committed by the participant, injuries caused by restraints, serious injury, death, elopement, intimidation, sexual abuse, use of restraint, medical/behavioral admission, medication errors as well as other injury.

All employees are trained in ensuring the health and welfare of participants and proper reporting of any suspected maltreatment.

COMMUNITY RESOURCES

If, at any time, you are in need of legal representation or would like assistance in accessing self-help or advocacy support services, you may contact your Case Manager, NOWCAP Services program representative, or local Participant Support Specialist for further information and referral. The following is a list of agencies and advocacy groups that may be able to assist you:

Brain Injury Advocates of Wyoming

307-473-1767

Governor's Planning Council on Developmental Disabilities

1-800-438-5791

Natrona County Department of Family Services

307-473-3900

Sweetwater County Department of Family Services

307-362-5630

People First of Wyoming

307-777-5675

Protection and Advocacy Systems, Inc.

307-632-3496

Social Security Administration

800-772-1213

Wyoming Guardianship Corporation

307-635-8422

Legal Aid of Wyoming, Inc.

307-232-9827

Wyoming Department of Healthcare Financing, Developmental Disabilities Section

307-777-7115 or 800-510-0280

Wyoming Independent Living

307-266-6956





CONFLICT RESOLUTION

If you or your guardian has a concern, it is the policy of NOWCAP Services to deal with such conflict by using one of many systems that we have in place to assist you in resolving your concern. These methods include, but are not limited to:

- House meetings with the participants and staff. Find out when the next meeting is by contacting your Program Director or other Program Management.
- Discussion with your Program Director or Program Manager or other organizational leadership.
- Requesting a meeting to discuss concerns with your team.
- Accessing community options such as counseling.

NOWCAP Services will assist the participant and/or guardian in resolving conflict by facilitating any one of these options or through other suggested means. NOWCAP Services will assist the participant to advocate for him/herself and will educate the participant and/or guardian so that they can make informed choices on behalf of themselves. The preference of NOWCAP Services is to address your concern immediately and in the moment; however, if satisfaction is not met, then more formal procedures can be taken which is referred to as the Policies & Procedures for Grievance and Conflict Resolution for Participants, Legal Guardians and Community Members.

GRIEVANCE & CONFLICT RESOLUTION FOR PARTICIPANTS, LEGAL GUARDIANS & COMMUNITY MEMBERS

POLICY:

It is the policy of NOWCAP Services that all participants and/or legal guardians may make a formal complaint, file a grievance, or appeal a decision made by the organization's personnel or team members through the organization's formal grievance process. All participants/guardians have the right to use the grievance procedure whenever satisfaction cannot be informally resolved through conflict resolution.

It is recommended that conflict be dealt with in an informal fashion prior to the participant and/or legal guardian utilizing the grievance process. The organization needs to be attentive to the requests, complaints, and concerns of all participants and/or legal guardians by addressing their concerns in an expeditious and professional fashion. NOWCAP Services reviews informal complaints in attempts to minimize formal complaints. Informal complaints, as well as requested resolution to the complaints, are reviewed weekly in the Administrative Case Contact meeting by all management.

Information on how to file a formal grievance is given to the participant upon admission to the program, at each annual plan of care staffing, and/or whenever requested by the participant and/or the legal guardian.

Filing a formal grievance will not result in retaliation or barriers to services. Procedures for review will be explained to the person served in a manner that is understandable to them.

The organization's administration team will review formal complaints at least annually to determine trends and areas needing performance improvement.

Community members may also file a formal grievance following the formal grievance process whenever satisfaction cannot be informally resolved through conflict resolution. The Formal Grievance Form can be accessed from the organization's website at www.nowcapervices.org or by contacting the Corporate Compliance Officer at (307) 237-9146 extension 404.

PROCEDURES:

1. The grievance procedure can be utilized whenever satisfaction cannot be informally resolved. All NOWCAP Services participants or the legal guardians have the right to initiate a grievance within fourteen (14) days after the incident resulting in dissatisfaction. The following would be considered for initiation of the grievance procedure:
 - a. Programming decisions including reduction, suspension, termination, or denial of services.
 - b. Anything that is believed to adversely affect the health, safety, or well-being of the participant.
2. If the participant is unable to represent themselves or the grievance process, they may select an advocate (staff, non-staff, or outside entity) to assist them with their grievance.
3. All NOWCAP Services participants or the legal guardians have the responsibility to follow the Procedure for Participant Grievance as written. The following steps must be adhered to throughout the process:

Step 1: Informal discussion (conflict resolution) with the area Director, Assistant Director, and/or the staff person involved in the complaint. Whenever the participant has a concern or a request, every effort to resolve the problem in a fair and equitable manner, consistent with NOWCAP Services Policies and Procedures should be made by the staff person. NOWCAP Services staff will ensure that a participant's rights of dignity and respect are protected. This process should take no longer than three (3) business days.

Step 2: Formal presentation to the area Director and/or Assistant Director. If the participant has been unsuccessful in resolving their grievance in an informal manner, they will specify in writing (with assistance if needed) the grievance and the desired solution to the area Director or Assistant Director or appropriate staff member. This written notification will be submitted to the appropriate staff person within fourteen (14) days of the incident. A written response will be supplied to the participant within three (3) business days and kept in the participant's main file.

Step 3: Hearing by the Executive Director. If a satisfactory settlement cannot be reached in the previous steps, the participant (with assistance if needed) must submit a written report to the Executive Director within three (3) business days of the written response in Step 2, and it will be kept in the participant's main file.

Step 4: Outside agency intervention. If satisfaction is still not received by the participant from NOWCAP Services, a written report will be submitted to the appropriate outside agency (based on the type of grievance). Such agencies may include, but are not limited to:

1. Wyoming Department of Health
2. Office of Equal Opportunity
3. Protection and Advocacy
4. Department of Labor
5. Department of Family Services
6. Court system

4. Failure to follow the first four (4) steps of NOWCAP Services' Grievance Procedure will result in forfeiture of the entire grievance process.
5. Filing a formal grievance will not result in retaliation or barriers to services.
6. Area Directors or Assistant Directors will review the grievance procedure with participants during their annual plan of care staffing and will complete a *Notice of Receipt of Grievance and Conflict Resolution Procedure* as part of the annual releases.



NOWCAP SERVICES **FINANCIAL MANAGEMENT**

NOWCAP Services offers representative payee services as assigned by the Social Security Administration. This service includes; monitoring of funds, payment of rent, supplemental services and other accounts, distribution of spending money, balancing checkbooks, maintaining financial files, reporting to Social Security, and when applicable, working with the participants themselves to learn how to manage their own funds while ensuring proper distribution of their money. Participants are able to access their funds by completing an expenditure request form with staff assistance, if needed. A participant or legal guardian can also request financial records by contacting the Administration Office. Fee for service is the allowable amount determined by Social Security. NOWCAP Payee services are optional and participants can receive all other services without NOWCAP being the payee.

Anyone who receives services through the Medicaid Home and Community-Based Services Waiver must also meet financial eligibility through the Department of Family Services. Funds are monitored monthly by the Department of Family Services to ensure that a participant does not exceed financial eligibility requirements. Exceeding the limits will jeopardize a participant's funding and can cause them to potentially lose services.



MANAGEMENT OF PARTICIPANT FINANCES & PROPERTY

August, 2010 (Revised: March, 2012; March, 2015; May, 2016; January, 2018; July, 2019; February, 2021; June, 2021; January, 2022)

POLICY:

NOWCAP Services has been assigned by the Social Security Administration as representative payee for participants who are in need of assistance in managing their social security income. NOWCAP Services will meet all requirements of the Social Security Administration in exercising its duty as representative payee, and will engage in audits and reviews by the Social Security Administration when required.

NOWCAP Services will respect and protect participants' personal property.

PROCEDURES:

It will be decided through the interdisciplinary team process and/or identified within Court-appointed guardianship documents, if a participant has the ability to give informed consent for expenditures of social security or other funds. NOWCAP Services exercises the least amount of control in regards to the participant's personal resources. If a participant has the ability to give informed consent, then they can assist in determining how funds are disbursed. If a participant does not have the ability to give informed consent, then the interdisciplinary team, with the assistance of the Operations Support Specialist responsible for participant funds, will make these decisions in the best interest of the participant. The details of consent are documented within the person's individual plan of care and reviewed at least annually. NOWCAP Services charges a participant an approved fee for representative payee services established by the Social Security Administration, and this fee notification and agreement, *Social Security Representative Payee Services Form*, is reviewed, agreed upon and signed annually with the participant and/or their guardian and payee. A participant is not obligated to purchase Social Security representative payee services from NOWCAP Services, and the purchase of this service shall not be a condition of leasing housing or receiving other available services for which the participant may be eligible to receive from NOWCAP Services.

Participants are encouraged to be a part of the banking, budgeting and the check writing process. The level of involvement is determined by the interdisciplinary team including the participant and guardian. This involvement may include writing checks, requesting access to view their financial records, and managing a pre-approved amount of cash on their person as determined in the plan of care.

In the event the participant cannot manage his/her money, NOWCAP Services will utilize debit cards in addition to a cash/money bag (kept in a locked location at all times) with a cash transaction log to account for expenditures; and the Manager and/or designated staff are responsible for collecting and providing receipts.

The assigned Manager and/or designated staff is responsible for accounting (reconciling) on each of the participants' cash transaction logs in their sphere of responsibility every time a transaction takes place and at month's end.

Borrowing, manipulating and/or personal use of any cash/money related to NOWCAP Services business (in any dollar amount) is strictly forbidden and CONSIDERED THEFT, and may be grounds for immediate termination of employment and/or legal prosecution. In addition to immediate termination, any theft over \$50.00 will be reported to the social security administration and the police, and charges will be filed. Replacement of funds or personal property in the event of theft or an unexplainable disappearance at an agency facility or during provision of services will be addressed and handled on a case-by-case basis and dependent upon the amount of funds or property taken or missing, the ability to recover the funds or property from the perpetrator if known, and the organization's liability insurance coverage. All efforts will be made to recover the missing funds or property, and if not possible, the organization will reimburse the participant and/or replace personal property with a comparable item. If there is a situation where a participant's expenditure cannot be justified, the organization will thoroughly investigate the purchase and the individuals involved in the decision-making and approval of the purchase, and determine if reimbursement of participant funds is warranted.

NOWCAP Services will ensure the proper and appropriate disbursement of funds by:

- A. The interdisciplinary team will determine the participant's day-to-day living expenses and the provision of those needs.
- B. Each participant will have a checking account in their name with NOWCAP Services having the authority to approve and sign all expenditures. Some participants, depending upon their skill level, may be a secondary 'signer' on the account. This may be done to provide further opportunity for a participant to learn about managing their finances and to begin taking ownership for their funds.
- C. Ensuring current and reasonably foreseeable needs and ensuring that these needs are met to the extent possible based upon the availability of funds. The organization will never sacrifice current needs to pay other expenses, past debt, or use as a means to accumulate conserved funds.
- D. Maintaining current and accurate financial records by monitoring balances and all income, funds or items a participant may own that could be converted to cash and negatively impact eligibility.
- E. Staff will handle all participants' money and/or debit cards within their sphere of responsibility with honesty, integrity and ethics. Participants' money in the sphere of their responsibility includes, but may not be limited to: Participant spending money/activity funds, funds for grocery shopping, petty cash for activities.
- F. Monthly reconciliation of bank statements, ledgers and cash transaction logs is required.
- G. If a participant qualifies for an interest-bearing account then the interest will be directly credited to that account per the interest earned and documented on the checking account statement.
- H. Completion of annual accounting reports, and/or any other required reports.
- I. The provision of education and information to participants and/or their legal guardian. If a participant and/or guardian requests to access records of funds, they may do so by contacting the Operations Support Specialist responsible for participant funds.
- J. Notifying the Social Security Administration when participants:
 - i. Move.

- ii. Marry or divorce.
 - iii. Start or stop working.
 - iv. Whereabouts are unknown.
 - v. Leave the U.S. for 30 consecutive days or more.
 - vi. Immigration or citizenship status changes.
 - vii. Pass away.
 - viii. Benefits have been stolen.
 - ix. No longer require payee services.
 - x. Are confined to a correctional facility or have an unsatisfied warrant.
 - xi. Acquire countable resources that exceed \$2000 for an individual or \$3000 for a couple.
- K. NOWCAP Services will secure money/cash for participants that are *not* assigned to NOWCAP Services for social security representative payee in program cash/money bags not exceeding \$40.00. NOWCAP Services will secure money/cash in an amount exceeding \$40.00, but not to exceed \$500, for non-payee participants if the money is delivered to the NOWCAP Services Administration office for securing with the Operations Support Specialist responsible for participant funds or the appropriate Program Director.

The organization will not use funds to purchase items that are normally provided to the participant by the organization or that are covered under any state or federal program.

The organization will ensure the security of participant benefits and benefit information as well, will protect participants from identity theft or accidental loss or disclosure of confidential information. The organization has policies and procedures in place to protect participant confidential information. As well, the organization requires the following safeguards:

- A. All participant financial information including checkbooks, check signature stamps, bank statements and the like, will be stored in secure areas.
- B. Participant financial information is only disclosed to the appropriate persons. Releases of information are obtained for anyone who requests information and is not allowed direct access.
- C. Firewalls, anti-spyware, anti-viral software and computer passwords are also utilized for security purposes.
- D. All expenditure requests involving an activity will be reviewed and approved by a member of Community Services management prior to being forwarded to the Operations Director/Assistant Director and then the Operations Support Specialist responsible for participant funds. All other expenditure requests for specific items or routine spending will be reviewed by the Operations Support Specialist responsible for participant funds for affordability and appropriateness. If an expenditure request is questionable ie: over and above \$100, request for items out of the ordinary, etc., then the Operations Support Specialist will take the expenditure request to an Administrator for approval or denial. If an expenditure is \$500 or over, then a second review and signature will be required by the Executive Director or his/her designee.
- E. Online internet purchases for approved expenditure requests must be completed by a member of management or the Operations Support Specialist responsible for participant finances. Any online orders are to be shipped to the administrative office, and a member of management will be responsible for receipt of the item(s) and delivery or pick up for the participant to ensure the participant receives the item(s) ordered.
- F. Avoidance of expenditures made out to 'cash'.

- G. Although social security and other funds may be deposited into the same banking account, all deposits will clearly identify source of the income as social security income, employment income, etc.
- H. Participant funds may also be loaded onto a bank card for specified purchases, spending money, etc. The Operations Support Specialist responsible for participant funds can then monitor purchases on an internet-based account service provided by the financial institution. Receipts for purchases are still required.
- I. If a participant has cash at a program area, it will be either maintained in a bank bag not to exceed \$40 or will be returned to the Operations Support Specialist responsible for participant funds to be re-deposited in the participant's bank account.
- J. Intermingling of participant funds, either in bank accounts or money bags, is not allowed.
- K. All expenditure receipts and/or remaining funds will be turned into the Operations Support Specialist responsible for participant funds as quickly as possible or at least by the end of the month for proper reconciliation.
- L. Scholarships for rent, supplemental services, representative payee services, and activities may be applied for by the participant or the participant's case manager, area Director and/or Assistant Director, guardian, payee or other authorized representative in the event that a participant has insufficient funds for these expenses.
- M. NOWCAP Services will encourage and educate participants, guardians and payees of the benefits of establishing a WYable account to allow for money savings without the risk of losing eligibility of Medicaid services.
- N. Communication of these procedures in writing to participants and/or legal guardians, as applicable, will be done prior to admission to NOWCAP Services or when updates or changes are made to the procedures.

PROHIBITED PRACTICES INCLUDE:

- Using participant funds or property as a reward or punishment;
- Using participant funds or property as payment for damage *if* appropriate supervision levels were not met when the damage occurred;
- Using participant funds or property to purchase provider inventory or services;
- Using participant funds or property as a loan; and
- Commingling funds with provider accounts

HCBS PARTICIPANT FUNDS PROCEDURES:

- Participants shall not be charged for service or items that are covered through other funding or sources. This includes, but is not limited to, items necessary to provide, and transportation related to habilitation services.
- Provider shall ensure that participants are compensated for when staff, guests, or other participants who do not reside in the location eat food purchased by participants.
- Provider shall ensure participants are compensated for personal items that are damaged if the damage was not the fault of the participant.
- Provider shall not charge participants for changes to Provider's staffing, facilities, or services.
- Participants shall not be required to pay provider for provider family members or others to attend events. Participant shall not be required to pay for a Provider's salary while attending an event.

PARTICIPANT ACTIVITY FEES

PROCEDURES:

This procedure outlines the process by which fees for un-reimbursed activities will be calculated and billed to a participant. This procedure is not intended to create financial pressure on any participant's personal financial standing. The purpose of this procedure is to help facilitate more activities and recreational opportunities for persons who participate in the program.

1. Services such as transportation to and from day services, residential services, medical services and other reasonable in-area activities are a part of participating in this program and the fees paid by each participant's fee sponsor. There will not be an attempt to collect any reimbursement for transportation which falls within these categories.
2. NOWCAP Services does reserve the right to charge an activity fee for events, activities or supplies which fall outside of normal or reasonable costs incurred through the fees paid through a participant's fee sponsor. The estimated or actual fee for activities is included on the monthly Activities Calendars that are sent via Therap S-Comm to parents/guardians and Case Managers prior to the start of the month. Examples of events which may have an activity fee associated would be: travel costs further than 60 miles round trip for day program activities, vacations, emergency travel not related to medical issues, conferences, work experiences, concerts or plays, etc. No participant will be charged for transportation expenses for out-of-town medical appointments. If an out-of-town medical appointment is necessary for a participant, the Department of Health Customer Service Line (1-855-294-2127) will be utilized to determine if other funding is available to assist the participant with transportation expenses. The participant's Case Manager may be contacted to assist with this process.
3. Each participant is responsible for their own activity cost, lodging, etc. The fee charged may include any of the following; fuel, vehicle use, staff per-diem (food, lodging, etc.), and staff participation costs (entrance fees, etc.). The fees charged for a given activity will be the same for all participants. Any activity in which the staff costs are \$10.00 or less per staff, such as entrance fees or ticket fees with no transportation expenses, the organization's petty cash fund will be utilized for staff costs. If staff costs for any activity are \$10.01 or higher per staff, the organization's established Activity/Trip Planner will be utilized.
4. If an activity has a fee associated, it is the responsibility of the organization to advise the participant, payee and guardian (as applicable) of the related cost prior to the event/activity verbally in person or over the telephone as well as in writing which may include email, Therap S-Comm or letter mailed via US Mail. If the cost is not disclosed to the appropriate person as defined above prior to an event/activity then the organization will not charge the activity fee. Fees may be paid via check or money order made payable to NOWCAP Services. The organization recognizes that transparency and full disclosure be practiced in all of these transactions. The organization will provide participants, payees and guardians (as applicable) with 60-days written notice of any changes in set or established fees associated with the Activity/Trip Planner such as the federal mileage rate or standard meal expenses.
5. Scholarships will be available on a limited basis for these events. The organization's scholarship process must be followed if partial or complete waiver of fees is to occur.

6. The Executive Director will be the final authority in setting fees for activities and granting of scholarships unless delegated to another party.

NOWCAP Services offers a number of tobacco-free housing options for adults 18 and over with intellectual disabilities or adults with acquired brain injuries. NOWCAP Services believes in providing integrated housing that is individualized, safe, and comfortable.

Supervised Community Living:

- *Hours of Service: 12:00am to 12:00am*
- *Days of Service: Sunday through Saturday*
- *Settings: Participant Shared Home and Community*
- *Frequency of Services: 24 hours per day/7 days per week*
- *Services are available based upon person's needs, wants, and goals; and based upon individual preference and determination that the team can meet those needs.*

Supervised community living provides individualized training and supervision in a setting that promotes learning. NOWCAP Services group homes are integrated throughout the community. Each home has a staff person to assist individuals in daily activities, including: chores, meal planning and preparation, shopping, personal care, safety skills, recreational activities, and individualized training that are determined by the interdisciplinary team. The number of individuals living at each home varies depending upon the size of the home and the needs of the individuals. All individuals living in a group home have their own lease, locking bedroom, and personal belongings. Rent is based upon one-third of the person's total income, or the fee of the landlord (if not a NOWCAP-owned facility). Supplemental Services are \$446 month and includes; food, sundries, utilities, phone in main living area, basic cable in main living area, and maintenance. Referrals to community support services such as the Casper Housing Authority, and/or NOWCAP scholarship applications are available for those individuals in which this would pose a financial hardship.

Community Living Basic (formerly Supported Independent Living):

- *Hours of Service: 12:00am to 12:00am*
- *Days of Service: Sunday through Saturday*
- *Settings: Participant Home and Community*
- *Frequency of Services: Dependent on plan of care, this service definition has a minimum of 4 hours of service required. cannot exceed 4 hours per day.*
- *Services are available based upon person's needs, wants, and goals; and based upon individual preference and determination that the team can meet those needs.*

Community Living Basic (formerly Supported Independent Living) is a service offered to individuals who are able to live more independently, but still require the support of a staff person intermittently. Support and training is determined by the individual's interdisciplinary team. Community Living Basic fosters personal independence, community interaction, and interpersonal development.

Community Living Basic supports also includes 24 hour per day/seven days per week emergency on-call support to staff and participants. There is always a management person available to provide guidance and support.

Regular home inspections, drills, house meetings, and quality assurance checks are made to ensure that living situations are safe and meeting the needs of the individual. NOWCAP Services also plans and arranges weekly individualized recreational activities. Some people like to go to the mall or a

movie, while others may want to go to a football game or take karate classes! IT'S UP TO YOU!

*Local transportation services are also available through community resources and NOWCAP Services.

Pets and Service Animals

No pets are allowed at facilities that are owned/managed/leased by NOWCAP Services, with the exception of birds and fish or as approved by the Executive Director. The prospective pet owner will assume sole responsibility for maintenance, cost, and liability to include, but not limited to: feeding, licensing, immunizing, medical care, and/or any personal injury, etc. The ownership of any animal should bring no harm or discomfort to others residing in the home, neighbors or community.

NOWCAP Services reserves the right to determine if a pet is no longer appropriate and can request that the pet be removed from the facility for any reason.

If the person lives in a HUD property then rules of HUD will apply.

A companion animal and/or comfort animal is a service animal. If there is substantiation of a disability and the need for the reasonable accommodation that is represented to be the presence of that animal in order for the person with the disability to enjoy equal opportunity, the companion or comfort animal is considered a service animal.

An amendment to the resident lease, entitled "Service Animal Agreement" is required to have a service animal live with the resident on the premises.

NOWCAP SERVICES **DAY SERVICES**

Adult Day Services (ADS):

- *Hours of Service: 8:00am to 4:00pm, but may vary depending upon activity or event times.*
- *Days of Service: Sunday through Saturday*
- *Settings: Participant Home and/or Community*
- *Frequency of Services: Dependent on plan of care*
- *Services are available based upon the person's needs, wants, and goals; and based upon individual preference, and determination that the team can meet those needs.*

NOWCAP Services provides Adult Day Services in the community as well as in a participant's home (if the plan of care indicates this). NOWCAP Services provides day services that are facility-based only to a very selective cross section of participants who need facility-based services in lieu of individualized community-based settings. NOWCAP Services believes that most participants can be better served and benefit from services that are community-based and that facility-based services be provided as a last resort, not the first option.



EMPLOYMENT

NOWCAP Services has embraced the Employment First approach to service delivery, whereby each participant is provided appropriate assistance and supports with their specific employment wishes and endeavors per the Interdisciplinary Team's recommendations.

Participants and guardians, as applicable, will be provided the information for the local Department of Vocational Rehabilitation (DVR). NOWCAP Services, the Case Manager and/or the guardian may provide assistance in making the first call to set up an appointment.

TRANSPORTATION

All NOWCAP Services participants are educated about the transportation options in their community. This is done by:

- During New Employee Orientation Training, all staff is trained regarding the options available in their community in order to encourage proper use of all transportation methods. This will include the process in scheduling transportation, and fees associated with transportation methods.
- During Monthly Client meetings transportation methods and education will be provided when planning activities.
- To maximize independents all participants will be encouraged to utilize public transportation as their first option, participants will be encouraged to utilize public transportation, natural supports, and walking; and as a last option, provider transportation.
- Participants, or participant teams, who express interest in utilizing transportation independently, will be assessed for community safety, ability to arrange for transportation, fees and proper use of transportation. Once the assessment is completed, the participant and their team will meet to determine the participant's ability to utilize transportation and any risk associated with the outcome of the assessment.
- Participants will be encouraged to request and/or arrange for their transportation for activities.

SAFETY

Everyone at NOWCAP Services is responsible for ensuring safe environments. Emergency drills, inspections, wearing personal protective equipment, CPR/First Aid training, safety postings and adhering to safety policies are only some of the practices that help to keep us all safe.

In addition, all of NOWCAP Services' facilities, grounds, and vehicles are tobacco free. Participants are able to smoke in designated areas. Firearms, knives typically used as weapons, alcohol and any controlled substances are also prohibited in all NOWCAP Services facilities.

Visitors must check in with the front desk if coming to the main facility and be escorted by authorized personnel to their destination. Each participant can see all visitors, unless they are restricted on the participant's Individual Plan of Care (IPC) as determined by their team, utilizing the 8-step rights restriction process.

NOWCAP Services maintains high safety standards and conducts ongoing internal and external inspections and trainings to ensure that the organization's formal Safety Program is adhered to.

MEDICATION ASSISTANCE AND MANAGEMENT



MEDICATION ASSISTANCE AND MANAGEMENT

NOWCAP Services provides medication administration and management only when the participants/residents and/or legal guardians who expressly give NOWCAP Services the authority to manage their medications. This may be done using the Medicaid Waivers Medication Consent form completed with the Individual Plan of Care or permission in writing to manage medications. This consent will be obtained annually but can be revoked in writing anytime by the participant and/or legal guardian.

Medications will be reviewed in accordance with Wyoming Medicaid rule, CARF standards, and as determined by each prescribing professional but no less frequently than annually. Any medication, either prescription or over-the-counter (PRN), must have a signed physician order. This will include all vitamins, supplements, holistic remedies, etc. All participants will have a physician order summarizing any PRN (as needed) medications that can be offered for episodic illness or medical complaints.

MEDICATION ADVOCACY AND TRAINING FOR STAKEHOLDERS

NOWCAP Services Certified Medication Assistants (employees) will provide as much information, training, and education to participants in the following medication areas as they are knowledgeable; and as requested, to their parents or guardians:

- Medication Name, Dosage, and Frequency
- Prescribing Entity
- Reason and Rational for the Medication
- How the Medication Works
- Health and other Known Risks Associated with the Medication
- Intended Benefits
- Possible Side Effects
- Possible Food and/or Medication Interactions
- Importance of Taking the Medication as Prescribed
- Laboratory Monitoring, if Necessary

NOWCAP Services Certified Medication Assistants (employees) will refer participants or their parents or guardians to the prescribing entity (Doctor, Physician's Assistant, etc...) for further information, training, and education about the previous medication categories if they are unsure or do not know the requested answer. Additionally, participants or their parents or guardians will be referred to the prescribing entity for information about the following areas:

- Contraindications
- Alternatives to the use of Medications
- Alternative Medications
- Signs of Non-adherence to Medication Prescriptions
- Potential Drug Reactions when Combining Prescription and Nonprescription Medications, Including Alcohol, Tobacco, Caffeine, Illicit Drugs, and Alternative Medications
- Instructions on Self-administration, when Applicable
- The Availability of Financial Supports and Resources to Assist the Participant with Handling the Costs Associated with Medications

EQUAL EMPLOYMENT OPPORTUNITY & REASONABLE ACCOMMODATION

POLICY:

It is the policy of NOWCAP of Wyoming, Inc. and its subsidiary NOWCAP Services, hence referred to as "NOWCAP," that it will not discriminate against any employee or applicant for employment because of: race, color, religion, disability, age, sex, sexual orientation, gender identity, national origin or status as a veteran. Further, NOWCAP Services will not tolerate retaliation against any individual who has complained about discrimination or has participated in an investigation of any allegation of discrimination.

NOWCAP Services will act affirmatively to ensure employees are treated fairly without regard to their race, color, religion, sex, sexual orientation, gender identity, disability, age, national origin or status as a veteran. This policy applies to all activities, including, but not limited to the following; employment promotions, demotions, transfers, recruitment including recruitment advertising, layoffs or terminations, rates of pay or other forms of compensation, benefits selections or training and/or on-the-job training, reasonable accommodations for medical conditions or physical limitations.

NOWCAP Services respects the rights of its employees to work in an environment that is free from discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity, disability, age, national origin or status as a veteran. In compliance with the federal law, no official at NOWCAP Services will retaliate against an employee who complains about discrimination or who participates in a discrimination investigation either: 1) through the internal complaint procedure described below; or 2) through any municipal, state, or federal equal employment opportunity agency investigation. It is the policy of NOWCAP Services to follow this and all laws relating to its overall operation and practices.

Because NOWCAP Services is an equal opportunity employer it is required by the federal government to gather statistical data on an employees' race and ethnicity, veteran status and disability status. The data gathered is purely voluntary and the employee can refuse to provide the information without adverse treatment or denial of employment. The data is compiled to complete the agency's Affirmative Action Plan (AAP).

Employees who believe that they have been subjected to or have witnessed job-related discrimination, are encouraged to report any alleged discrimination to any supervisor or manager, or to E.J. Stolns, President & C.E.O. at 307-347-6185 or Dawn Lacko, Executive Director of NOWCAP Services, at 307-237-9146. Within ten (10) calendar days of complaint, management officials will conduct a full investigation, which will include a thorough interview with the complaining employee, the person or persons accused of discrimination, and any witness, as appropriate. Upon conclusion of the investigation, the investigating managerial official will report back to the complaining employee, and take appropriate action against the offending party. Employees may also complain by contacting the Equal Employment Opportunity Commission by telephone at 303-866-1300 or 800-699-4000, or by mail at 303 East 17th Avenue, Suite 410, Denver, Colorado 80203.

If there are any questions concerning the Equal Employment Opportunity & Reasonable Accommodation Policy & Procedures of NOWCAP of Wyoming, Inc, and NOWCAP Services, please contact E.J. Stolns (307-347-6185) or Dawn Lacko (307-237-9146) with any concerns.

NOWCAP SERVICES

Notice of Privacy Practices for Protected Health Information (2024)

As a participant of NOWCAP Services, you and health information pertaining to you, will be protected under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). If information about you is requested from another entity, NOWCAP Services will be required to obtain your authorization prior to disclosure.

Instances in which your authorization is **not** required include:

- Uses and disclosures required by law and funding agents.
- Reporting of potential abuse, neglect, exploitation, and/or abandonment to required entities.
- Judicial and administrative proceedings.
- Law enforcement purposes.
- Worker's compensation.
- Correctional facilities.
- Governmental health oversight agencies for the purpose of audits, investigations, and inspections.
- To avert a serious threat to a participant's health and safety.
- Public health entities legally authorized with preventing or controlling disease, injury, or disability.

NOWCAP Services will make every effort to ensure that authorized disclosures will be limited to the minimum necessary to accomplish the intended purpose. Disclosures will be time specific, revocable, and understandable.

You have the following rights regarding health information we maintain about you:

- Right to Inspect and Copy,
- Right to Request an Amendment,
- Right to an Accounting of Disclosures,
- Right to Request Confidential Communications,
- Right to a Paper Copy of This Notice.

Any complaint that you may have regarding unauthorized disclosure of your protected health information can be made to the organization's HIPAA/Compliance Officer at any time by contacting Kari Cornella, NOWCAP Services, 345 N. Walsh Drive, Casper, WY 82609 or at (307)-237-9146.

*NOWCAP Services may request that you pay for the cost of document reproduction.

ACKNOWLEDGEMENTS & SIGNATURE PAGE

PLEASE RETURN TO NOWCAP SERVICES IN THE ENCLOSED POSTAGE PAID RETURN ENVELOPE.

PRINTED NAME OF PARTICIPANT: _____

NOWCAP SERVICES PARTICIPANT UNDERSTANDING OF ORIENTATION

I, _____, for _____, (participant's name) have been thoroughly familiarized with the participant handbook. I will make every effort to comply with the information set forth in the handbook and will keep a copy of the guide on hand so that I can refer to it at any time.

ALSO INCLUDED IN THE 2022 PARTICIPANT HANDBOOK:

NOTICE OF PRIVACY PRACTICES FOR PROTECTED HEALTH INFORMATION (2022)

I have read and understand NOWCAP Services "Notice of Privacy Practices for Protected Health Information."

Signature of participant and/or legal guardian

Date

NOTICE OF RECEIPT OF POLICIES & PROCEDURES REGARDING GRIEVANCE AND CONFLICT RESOLUTION FOR PARTICIPANTS, LEGAL GUARDIANS & COMMUNITY MEMBERS

NOWCAP Services takes pride in resolving issues of conflict with guardians, participants and community members immediately through informal conflict resolution. If you are not pleased with the results of this process, a grievance procedure is available. It is the practice of NOWCAP Services to notify participants and/or their legal guardian of the Procedure for Grievance and Conflict Resolution for Participants, Legal Guardians and Community Members, at least one time annually.

This procedure has strict timeframes in which to initiate a grievance. Please review the included Procedure for Grievance and Conflict Resolution for Participants, Legal Guardians and Community Members, and feel free to contact any member of the NOWCAP Services administration team for assistance or questions.

Your signature below indicates that you have received a copy of the Procedure for Grievance and Conflict Resolution for Participants, Legal Guardians and Community Members.

Signature of participant and/or legal guardian

Date

NOTICE OF RECEIPT OF POLICIES & PROCEDURES REGARDING THE MANAGEMENT OF PARTICIPANT FINANCES & PROPERTY & PARTICIPANT ACTIVITY FEES

Your signature below indicates that you have received a copy of the Policies & Procedures regarding the Management of Participant Finances & Property & Participant Activity Fees.

Signature of participant and/or legal guardian

Date