



Embers to Bloom
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2.1 Client Rights Policy (EB-CR-001)

Effective Date: 09/01/2025

Review Date: 09/01/2026

Approved By: Director of Operations / Compliance Director

Policy Statement

Embers to Bloom affirms that every individual served has the right to be treated with dignity, respect, and fairness. Client rights are protected under Ohio Administrative Code 5122-26-18 and federal law. These rights apply to all services provided, including in-person and telehealth services.

Client Rights

Each client receiving services from Embers to Bloom is entitled to the following rights:

1. The right to be informed of these rights, and to receive a copy of them.
2. The right to be verbally informed of all client rights, and to receive a written copy upon request.
3. The right to receive information in language and terms appropriate for the person's understanding.
4. The right to receive humane services in the least restrictive, feasible environment.
5. The right to be treated with consideration and respect for personal dignity, autonomy, and privacy.
6. The right to reasonable protection from physical, sexual, or emotional abuse, neglect, and inhumane treatment.
7. The right to receive services in the least restrictive, feasible environment.
8. The right not to be discriminated against on the basis of race, ethnicity, age, color, religion, gender, national origin, sexual orientation, physical or mental handicap, developmental disability, genetic information, human immunodeficiency virus (HIV) status, or in any manner prohibited by local, state, or federal law.
9. The right to know the cost of services.



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10. The right to be informed of the expected results of all services provided and of all alternatives.
11. The right to be informed of one's own condition.
12. The right to participate in the development, review, and revision of one's individual service plan (ISP) and to receive a copy of it. Participation in the ISP is a right regardless of the client's refusal of other services, unless participation in such services is required for clear treatment reasons and documented accordingly.
13. The right to give full informed consent to receive services prior to the start of services, and the right to refuse services (except as otherwise provided by law).
14. The right to be informed of the consequences of such refusal.
15. The right to be informed a reasonable amount of time in advance of the reason for terminating participation in a service, and to be provided a referral, unless the service is unavailable or not necessary.
16. The right to be informed of the reason for denial of a service.
17. The right to be free from seclusion or restraint as necessary to prevent physical harm to self or others, and only as permitted under law.
18. The right to be free from unnecessary or excessive medication, and to be free from restraint or seclusion except as permitted under law.
19. The right to be informed of, and to refuse, any unusual or hazardous procedures, experimental treatments, or research.
20. The right to be advised and the right to refuse observation by others and by techniques such as one-way mirrors, tape/video recorders, television, movies, photographs, or other audio/visual technology (does not prohibit agency monitoring of seclusion rooms or common areas; bathrooms/sleeping areas excluded).
21. The right to consult with a specialist or legal counsel at one's own expense.
22. The right to access one's own record unless access is restricted for clear treatment reasons. If access is restricted, the treatment plan will include the



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- reason for the restriction, a goal to remove the restriction, and the treatment being offered to remove the restriction.
23. The right to have the opportunity to have an independent review of one's treatment plan.
 24. The right to receive an explanation of all medications prescribed, including the reason, the risks, and the benefits.
 25. The right to refuse any medication, unless court-ordered or in an emergency.
 26. The right to exercise civil rights, including the right to vote, marry, contract, and hold a driver's license, unless restricted by law.
 27. The right to be informed of advance directives and to have them honored to the extent permitted by law.
 28. The right to exercise one's own rights without reprisal, except that no right extends so far as to supersede health and safety considerations.
 29. The right to have oral and written instructions concerning the procedure for filing a grievance, and to assistance in filing a grievance if requested.
 30. The right to file a grievance if rights are violated, and to have assistance in filing a grievance.
 31. The right to be informed of the grievance procedure, to file a grievance if rights are violated, and to have assistance in filing a grievance.
 32. The right to be free from retaliation for filing a grievance.
 33. The right to appeal a grievance decision to outside agencies, including the Ohio Department of Mental Health and Addiction Services (OhioMHAS) and Disability Rights Ohio.
 34. The right to have these rights prominently posted in all service areas and available on request.

Procedures



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- **Posting of Rights:** Client rights will be posted prominently in the office lobby, therapy rooms, and on the Embers to Bloom website.
- **Distribution:** At intake, clients are provided a copy of their rights in the onboarding documents (in print for in-person services or electronically for telehealth). Clients acknowledge receipt through signature.
- **Updates:** Any revisions to client rights will be communicated to all clients within 30 days.
- **Training:** Staff will receive annual training on client rights, procedures for protecting these rights, and the grievance process.

Non-Retaliation Assurance

Embers to Bloom strictly prohibits retaliation against any client who asserts their rights, files a grievance, or participates in a grievance review process.

2.2 Client Grievance Policy (EB-CR-002)

Effective Date: 09/01/2025

Review Date: 09/01/2026

Policy:

Embers to Bloom ensures that all clients may express concerns, complaints, or grievances about services, staff, or operations without fear of retaliation. Grievances will be addressed promptly, fairly, and documented in compliance with OAC 5122-26-18(E).

Purpose:

To establish a fair, accessible, and transparent process for clients to submit grievances and to ensure the agency responds within defined timeframes, while using feedback to improve services.

Procedures:

1. Submission of Grievance



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Grievances may be submitted **verbally or in writing** by the client, guardian, or authorized representative. Written grievances should also include, if available, the date and approximate time of the incident, a description of the incident, and the names of individuals involved.

Any staff member receiving a grievance must immediately forward it to the **Compliance Director, who also serves as the agency's designated Client Rights Officer**. Each written grievance must be dated and signed by the client, their representative, or attested to by the client advocate as a true and accurate representation of the grievance.

If a grievance is submitted verbally, the Client Rights Officer (or designee) will prepare a written text of the grievance for the client to review and sign.

2. Acknowledgment

- Written or verbal acknowledgment of the grievance will be provided to the client within **3 business days by the Compliance Director/Client Rights Officer (or designee)**.
- The acknowledgement will include:
 1. Date grievance was received
 2. Summary of the grievance
 3. Overview of the investigation process
 4. Timetable for completion and notification of resolution
 5. Treatment provider contact name, address, and telephone number

3. Investigation

- The **Compliance Director/Client Rights Officer** (or designee) will conduct an impartial investigation, including staff interviews, documentation review, and communication with the client. The investigation will be completed within **10 business days**.

4. Resolution

- The **Compliance Director/Client Rights Officer** (or designee) will issue a written resolution within 20 business days of receipt, unless extenuating circumstances are documented in the grievance file and written notice is provided to the client. If extenuating circumstances require more than 20 days, documentation explaining the delay will be included in the grievance record, and the client will be notified in writing.
- The resolution will include: findings, actions taken, and the client's right to appeal.

5. Appeals

- If the client is dissatisfied, they may request review by the **Executive Director** of Embers to Bloom.



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- Clients may also choose to file a grievance with external agencies, including but not limited to:
 1. Cuyahoga County ADAMHS Board – 2012 W. 25th Street, 6th Floor, Cleveland, OH 44113; (216) 241-3400
 2. OhioMHAS Client Rights Officer – 30 E. Broad Street, 8th Floor, Columbus, OH 43215; (614) 466-2596
 3. Disability Rights Ohio – 200 Civic Center Dr., Ste. 300, Columbus, OH 43215; (800) 282-9181
 4. U.S. Department of Health and Human Services, Office for Civil Rights – Region V, 233 N. Michigan Ave., Suite 240, Chicago, IL 60601; (800) 368-1019
 5. Applicable professional licensing boards (for licensed staff, as appropriate).
- Clients will be provided assistance in contacting these agencies upon request.

6. Documentation

The agency will maintain grievance records for at least **two years** from the date of resolution. Each grievance record will include:

1. A copy of the grievance;
2. Documentation of the process used and the resolution/remedy provided;
3. Documentation of any extenuating circumstances requiring resolution to extend beyond 20 business days, as permitted under OAC 5122-26-18(C)(3).
4. When available, grievance documentation will include the date and approximate time of the incident, a description of the incident, and the names of individuals involved.

All records will be kept in the Grievance Log and made available to OhioMHAS upon request. upon request. Grievances will also be reviewed as part of agency quality assurance processes to identify trends and support performance improvement.

7. Non-Retaliation

Clients will not face retaliation or reduction in services for filing a grievance.

Embers to Bloom designates the Compliance Director as the Client Rights Officer. The posted Client Rights include the Client Rights Officer's **name, title, location, hours of availability, and telephone number**.

Client Rights Officer: Ursule Bissereth, Compliance Director

Address: 159 Crocker Park Blvd, Suite 400, Westlake, OH 44145

Hours: Monday–Friday, 8:00 AM – 9:00 PM **Phone:** (513) 224-4450

Email: compliance@emberstobloom.com