



The Wave International, LLC  
28059 US 19 N Suite 205  
Clearwater, FL 33761  
727-205-7077

November 18, 2022

RV2023-007  
**RECEIVED**  
Nov 18 2022  
STATE HEALTH PLANNING AND  
DEVELOPMENT AGENCY

To Whom It May Concern:

Pursuant to Alabama Administrative Code r. 410-1-7-.02, we are filing this letter of non-reviewability with respect to The Wave International's intent to open a Mental Health treatment facility. We are looking to provide, through the Alabama Department of Mental Health, a Behavioral Health Residential, Partial Hospitalization, and Intensive Outpatient Mental Health facility in Washington County.

Specific facts related to our filing:

1. The Wave International, LLC is the name of our organization.
2. The letter is being filed by:  
Andre Genao  
Chief Compliance Officer  
[Andre@thewaveint.com](mailto:Andre@thewaveint.com)
3. The service area for the proposed project is in Washington County. This facility will be located at 21168 Highway 17, Chatom, AL 36518.
4. The Wave International, LLC is an organization that specializes in Mental Health treatment. This project involves opening a 36-bed Residential Mental Health Treatment facility with additional programs for Partial Hospitalization and Intensive Outpatient. The 36 residential beds will be for an adult population who would benefit from a structured and supervised Mental Health program under Section 580-2-9-.18 - Residential Services of the Alabama Administrative Code. Our Partial Hospitalization program would be under Section 580-2-9-.13 - Partial Hospitalization Program of the Alabama Administrative Code. Our Outpatient services component would be under Section 580-2-9-.09 - General Outpatient of the Alabama Administrative Code.
5. The costs associated to construct and operate the project are as follows:  
**There are no expected equipment costs associated with this project.**  
**Total Cost of Construction and Capital Expenditures: \$7,650,000.**  
**Annual New Operating Costs: Estimated around \$4,000,000.**
6. There are no financial interests in this project from healthcare facilities or groups in the state.

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Affirmation of Requesting Party:

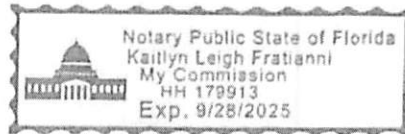
The undersigned, being first duly sworn, hereby make oath or affirm that he/she is the Chief Compliance officer, has knowledge of the facts in this request of his information, knowledge and belief, such facts are true and correct.

Affiant Andre Genao (Seal)

SUBSCRIBED AND SWORN to before me this 18<sup>th</sup> day of November, 2022

Notary Public Kaitlyn Leigh Fratanni

My commission expires: 09-28-2025

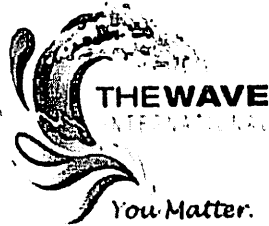


My contact number for any questions related to this letter is 352-442-2643.

Respectfully,

Andre Genao  
Andre Genao  
Chief Compliance Officer  
The Wave International

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RV2023-007  
**RECEIVED**

**Dec 07 2022**

STATE HEALTH PLANNING AND  
DEVELOPMENT AGENCY

December 7, 2022

Ms. Emily Marsal, Executive Director  
P.O Box 303025,  
Montgomery, Alabama 36130

RE: RV2023-007

Dear Ms. Marsal:

Thank you for your letter requesting clarification on our submission regarding a mental health treatment facility location at 21168 Highway 17 in Chatom, Washington County Alabama. Based on your clarification letter dated December 1, 2022, I will be providing additional information in this letter per your request.

1. Alabama Administrative Code 410-1-2-.05 defines the term health care facility as it relates to the Certificate of Need process. Specific mention is made for the term community mental health centers and related facilities. While we are not a community mental health center, no further explanation is given for the term "related facilities" and what that would include.
  2. We have attached our comprehensive written plan for services which outlines how we provide care and services in our programs.
  3. We have attached our client snapshot which shows our typical client population and how revenue is generated for these clients. Please note, we currently operate three licensed facilities in the state of Florida using this model. We have significant experience in this area.
  4. Costs for the facility. These have been updated since our initial letter.
    - a. \$4,550,000 Capital Expenditure
      - i. \$3,500,000 Construction
      - ii. \$300,000 Pre-Development
      - iii. \$250,000 Site-Acquisition
      - iv. \$500,000 Site-Development
    - b. \$1,600,000 – Fees and Related
      - i. \$200,000 Architect and Engineering Fees
      - ii. \$250,000 Interest During Construction
      - iii. \$300,000 Attorney and Consultants
      - iv. \$350,000 Financing and related costs
      - v. \$500,000 Contingency
    - c. \$1,296,000 – New Annual Operating
      - i. This is payroll and related expenses
-



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Please let me know if you need any further information. I can be reached at 352-442-2643 or by email at [Andre@thewaveint.com](mailto:Andre@thewaveint.com).

Sincerely,

Andre Genao  
Chief Compliance Officer

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**THE WAVE INTERNATIONAL, LLC**

**WRITTEN PLAN FOR PROFESSIONAL  
SERVICES**

## **PART I: ORGANIZATION AND POPULATION SERVED**

### **I. PHILOSOPHY AND MISSION**

It is the mission of The Wave International, LLC to provide intensive, comprehensive treatment services to individuals who suffer from mental illness. The Wave International, LLC will establish cost effective behavioral health care services, promote cooperative working relationships with behavioral health care professional's organizations within the community, and establish a position of leadership in the delivery of private integrated comprehensive services in Florida. The primary mission of The Wave International, LLC is to assess and meet the behavioral health care needs of our community by adapting to changes in healthcare.

The Wave International, LLC's Treatment Model approach which addresses the whole person, is carried out by every staff person. Our intent is to preserve the dignity and respect of our clients and provide the best possible care. We are dedicated to providing quality care in a peaceful environment in which you feel welcomed, at ease, and ready to begin the process of healing.

The focus of the treatment program is on psychosocial rehabilitation using education, counseling, behavior management, and various modalities, and move the client into a productive lifestyle. A multi-disciplinary staff creates a therapeutic environment for clients at The Wave International, LLC in which this program is centered.

The specific goal of The Wave International, LLC is:

- To meet the therapeutic needs of clients by offering a safe, effective, and comprehensive program of rehabilitation.

## II. TREATMENT ASSUMPTIONS AND VALUES

The Wave International, LLC professional staff believes in healing through a whole person approach to treatment.

- a. The Wave International, LLC assumes that every person who comes to treatment is unique, bringing with them their own history, lifestyle, values, ways of seeing the world, and numerous other individuating characteristics.
- b. In this context, we use and value individual assessment and treatment.
- c. Individual and group therapy is at the heart of The Wave International, LLC treatment approach, and different kinds of groups address a variety of problems and issues.
- d. The Wave International, LLC's treatment approach is the process of life transformation. In accord with this perspective, one part of The Wave International, LLC goal with each client is to help them develop internalized hope and motivation for improved mental health, and a concrete plan for continuing care. This plan may involve moving through stages to progressively less restrictive treatment schedules within The Wave International, LLC system. It may also involve referral to other practitioners and/or agencies, and always include introduction and referral to appropriate self-help groups.
- e. Recovery from mental health is viewed as a process, not an event or an episode and requires a continuum of care. Recovery usually includes (a) gradually increased comfort with oneself and others, involving the ability to know and express feelings effectively; the clarification of values and beliefs, and practice of living in concert with those, and (b) renewed ability to commit oneself to others and to life goals and projects in healthy ways. These changes result in improvements in self-esteem, an important part of the recovery process. The Wave International, LLC also recognizes that recovery is not a linear process. It is often characterized by relapses into old ways of perceiving, thinking, and behaving.
- f. Because of the importance of their role in the treatment process, family members are significant others are encouraged to participate. When families cannot be physically present, regular telephone contact, conference calls, and written communication will be employed to keep them involved and informed and to help them find resources for dealing with their won emotional struggles.
- g. The Wave International, LLC utilizes the expertise, skill, and contribution of a variety of professional and paraprofessional personnel. Assessment, treatment

planning, and the delivery of services are provided by a multi-disciplinary team, composed of medical, psychiatric, nursing, and counseling professionals.

- h. The Wave International, LLC values quality. Therefore, The Wave International, LLC strives to assure that Client services are provided effectively and efficiently. In addition, The Wave International, LLC continuously develops methods to evaluate the quality and appropriateness of its performance and treatment services. The Wave International, LLC embraces a model of continuous performance improvement.
- i. The Wave International, LLC is a voluntary treatment program. To enter The Wave International, LLC clients need put their efforts into their goals and objectives in their treatment plan which is developed with their primary therapist upon admission. Clients are guided to work toward resolving the underlying issues, gain the self-awareness needed upon discharge from the program and re-entry into their home environment. At The Wave International, LLC, clients are treated with respect and dignity and are required to provide the same to The Wave International, LLC and its staff.

### **III. CLINICAL NEEDS ASSESSMENT AND PROGRAMMATIC DEVELOPMENT**

The Wave International, LLC was established to meet a national and local need for cost-effective treatment, with emphasis on hard-to-treat clients who can benefit from a change of environment.

The nature of mental health is changing. The emotional maturity of the clients seen today, complicated by the regressive influences of substance abuse and mental health, often makes treatment a “habilitative process” that is both time and treatment intensive. There is also a greater heed for a continuum of care in which a client may be involved for many months.

The Wave International, LLC was established primarily as residential treatment facility, designed to provide longer-term care for those who had completed a primary care (short-term) hospital program and who needed a gradual transition from intensive treatment to independent living. To respond to the needs of clients, the treatment community, and the managed-care initiatives of third-party payers, The Wave International, LLC has developed a continuum of care that includes intensive day/night treatment (partial hospitalization), intensive outpatient client, and outpatient client treatment components. To help with logistical needs and to reinforce the notion of a therapeutic community, The Wave International, LLC also provides room and board for clients participating in its residential program.

### **IV. POPULATION SERVED**



Clients admitted to The Wave International, LLC are males and females mostly between the ages of 20 and 35. Seventy percent of clients are referred from the Internet and the remainder from local sources.

Common client treatment issues relate to denial of their emotional/behavioral problems. Clients also often have a history of multiple treatments and demonstrate an inability to maintain good relationships in their daily life. On the positive side, most have an employment history; some family connections, and are in good health. They are sometimes on psychiatric medication but without a history of severe psychiatric problems. Medication is typically prescribed for suspected underlying problems (depression, bipolar disorders, etc.). They are capable of self-support and independent living but are at high risk without structured support and ongoing involvement with a treatment program. Approximately 20% of clients have been previously diagnosed with mental illness as well as psychoactive substance abuse. The length of stay for residential treatment services range from two to four weeks, with an average length of stay of about 28-90 days.

## **PART II: SERVICES AND SERVICE DELIVERY:**

### **I. SPECIFIC SERVICES AND A CONTINUUM OF CARE**

The main goals of The Wave International, LLC treatment include:

- a. To instill Mental and Emotional wellness as a daily practice.
- b. Service – using different modalities to affect change.
- c. To reduce denial regarding life problems.
- d. To understand mental health and begin to accept identity.
- e. To identify other significant life problems and make a plan for addressing them.
- f. To commit to a concrete plan for continuing care.
- g. To help the client identify the issues and tendencies that has promoted or could promote issues for them.
- h. To foster the attitudes and behaviors that is consistent with good mental health practices.
- i. To help the client develop a sense of personal responsibility.
- j. To help the client integrate with healthy support groups within and outside the treatment community.

- k. To help the client become employed and self-supporting.
- l. To facilitate the transition between treatment and independent living.
- m. To help the client manage life problems (emotional, family, social, etc.) that continue to interfere with healthy living.

The Wave International, LLC offers a three-phase program in which clients can progress from intensive residential, day/night treatment or intensive outpatient treatment to weekly outpatient treatment. Clients can also enter the continuum at any phase appropriate to clinical need and status.

- **Phase One:**

During the first phase of The Wave International, LLC's Residential and Day/Night (PHP) programs, clients are exposed to a day long schedule of clinical activities including group and individual therapy, educational sessions, and participation in self-help groups. From Monday through Friday, clients participate in treatment activities from 9:00 a.m. until 5:00 p.m. Evening and weekend IOP clients are exposed to 9-12 hours of counseling, educational and self-helps groups. OP clients are scheduled for weekly individual sessions.

During Phase One, the client's short and long-term needs are assessed, and a comprehensive treatment plan is begun. Clients are closely supervised during Phase One.

- **Phase Two:**

After demonstrating responsible behavior, clients in the Residential and Day/Night (PHP) programs may be moved to the second phase of the program. Treatment activities include group and individual therapy and daily attendance of groups.

- **Phase Three:**

The third phase of the program provides clients with support in maintaining a healthy lifestyle. Outpatient client groups focus upon practical, day-to-day issues that are important to a successful reintegration back in their life.

## **II. SERVICE DELIVERY**

- a. Treatment Modalities and Activities

- *Lectures*

- Lectures provide the clients with information on the nature and dynamics of substance abuse and mental health and chemical dependency and on its physical, social, emotional, psychological, and spiritual consequences.

- *Films*  
Clients are provided with a series of cinema therapy films on a regular basis for education and discussion.
- *Process Groups*  
Process Groups provide an opportunity for clients to obtain objectives and non-mental health feedback on their behavior, attitudes, feelings, and the methods of interpersonal relating. The groups also provide opportunities for self-expression and for experimenting with more productive ways of functioning. In this modality, there is also an emphasis on addressing issues that either interfere or limit participation in the Program.
- *Individual Counseling*  
The client meets with his/her counselor a minimum of one time per week (preferably two individual sessions per week) and on an "as needed" basis to resolve individual problems and issues during the progress of treatment. The client may also need individual counseling if he is not responding to group therapy or is in need of special types of counseling, which the group cannot provide. Individual therapy provides an opportunity for a more detailed analysis of the client's progress in meeting his Treatment Plan Goals. It also provides the opportunity for the counselor/client relationship to develop.
- *Family Education and Treatment*  
The Wave International, LLC recognizes that Mental illness is a family illness and often the family system adjusts to an illness in one of its members in maladaptive ways. The Family Program provides a rich and unique opportunity for family members to understand how they have been affected by the client's illness and what they can do to improve their emotional health and the health of the family system. The program provides both education and treatment. The therapy provides an opportunity for the family members to develop an awareness of how their lives have been affected and to express resultant emotions.
- *Caseload Groups*  
Caseload Groups provide the client and primary counselor's time to review treatment plans and process treatment plans. This group consists of the primary counselor and their specific Clients. The emphasis is on initiating and reinforcing, following through with group setting treatment plan objectives. These groups also allow for time to update the treatment plan as necessary.
- *Medical Education Group*  
These groups are provided to clients to address specific health issues such as infection control topics, nutrition, hygiene, HIV information/prevention, and medication information.
- *Recreational and Community Activities Therapy*
  - a. *Exercise/Fitness Component*  
Exercise and fitness are a priority of many clients and an interest of many others. It is seen by The Wave International, LLC as a particularly healthful use of leisure time because it encourages discipline, promotes a positive self-image, and gives clients a physical

outlet for the negative energy that is generated during the course of treatment and serves as an important “contradiction” to the substance abuse and mental health. Clients pursue exercise/fitness through physical activities about four (4) days per week, two (2) hours per day. Activities often include Yoga, Tai Chi, fitness training, fitness room, and walking.

b. Community Activities

Clients are also exposed to a variety of community resources to include outings to the local bookstore, beach, and museums.

The Goals of the Recreational and Community Program include:

- Learn basic principles of fitness and exercise including:
  - a. Yoga
  - b. Tai Chi
  - c. Fitness equipment training
  - d. Stretching and flexibility
  - e. Proper breathing
- Learn principles of wellness and maintaining a healthy lifestyle
- Improve social skills through participation in group activities
- Learn productive use of leisure time
- Explore and define interests through exposure to a variety of social and recreational activities.
- Learn to appreciate aspects of life that have been neglected and ignored.
- Learn to “have fun” without mood altering chemicals.

b. Other Specialty Services

- a. *Emergency Services:* All emergency medical services are provided by agreement with local hospitals. In case of a physical health emergency, 911 is called for emergency transfer to the nearest Hospital, with which there is a transfer agreement. In case of a substance abuse and mental health emergency, emergency transportation is provided to nearest Hospital.
- b. *Speech, Language, and Hearing Services:* These services are provided through an arrangement with a practitioner in the area. If that practitioner identifies a problem, the Program Director will make arrangements for professional services.
- c. *Dental Services:* These services are provided through local practitioners.
- d. *Clinical Laboratory Services:* Laboratory Services are provided through an agreement.
- e. *Pharmacy Services:* Client medications are ordered by a physician or ARNP, stored by The Wave International, LLC and self-administered by clients (“medication monitoring”).
- f. *Education Services:* Educational services are provided by referral to local educational institutions.

- g. *Vocational Rehabilitation Services*: These services are provided through a referral to Vocational Rehabilitation Services.
- h. *Pastoral Services*: These services are provided through a written agreement with local clergy.
- i. *Psychological Services*: Psychological services are provided at The Wave International, LLC.
- j. *Psychiatric Services*: Consultations are arranged with a local provider pursuant to the clinical needs and by order of the Medical Director.
- k. *Medical Services*: A member of The Wave International, LLC Professional Staff provides medical services. Consultations are arranged pursuant to the clinical needs of the client and by order of the Medical Director or ARNP.
- l. *Nutritional Services*: A member of The Wave International, LLC Professional Staff provides nutritional services. Consultations are arranged pursuant to the clinical needs of the client and by order of the Clinical Director, Medical Director or ARNP.

c. Aftercare Group

A critical component of treatment is preparation for follow-up. Aftercare (Alumni) groups are offered monthly to provide the client with support for ongoing recovery. Participants share what is happening in their lives and are given peer feedback and encouragement. The participants are expected to make serious efforts to stay sober in order to participate. If a participant experience relapse, they are referred to an appropriate level of care.

## **PART III: ASSESSMENTS AND TREATMENT PROCESS**

### **VII. THE INTAKE AND ADMISSION PROCESS**

The Wave International, LLC adult admission criteria is listed below.

Inquiries regarding admission generally occur over the telephone and are directed to the Intake Coordinator or a member of the professional staff.

Initial information is gathered to include at a minimum: Client's name, age, sex, date of birth, medical/substance abuse and mental health information, treatment history, and insurance information. Wherever possible, the client and family members are requested to come to the facility to see the program, talk with staff, and receive a face-to-face consultation with a member of the professional staff.

When an individual arrives to discuss admission, an assessment is conducted. If there is any question about the client's physical condition or suitability for treatment, it is discussed with the Medical Director. If it is determined by the Medical Director that the client is in need of another form of care, he/she is referred to a facility with which The Wave International, LLC maintains a referral agreement. Clients who do not have the financial ability to pay for treatment at The Wave International, LLC are assisted in finding alternative treatment. Every effort is made to secure assistance for these clients.

A specific description of the population to be served is as follows:

- The Wave International, LLC will admit clients over 18 years of age and older.
- All clients admitted for treatment must have a primary diagnosis of Mental Health. The Wave International, LLC admits clients on a voluntary status only.
- Clients are accepted from the following referral sources: self, primary treatment programs, family, physicians, social services, employee assistance programs, substance abuse and mental health professionals and facilities, law enforcement agencies, and concerned individuals.
- The Wave International, LLC will not admit imminently dangerous persons, persons requiring legal confinement, or those so impaired by chronic substance abuse and mental physical illness as to be unable to benefit from a psychotherapeutic program.
- The Wave International, LLC will treat clients regardless of race, creed, color, religion, ethnic origin, HIV status, or handicap.
- The facility is open twenty-four (24) hours per day, seven (7) days per week. Persons in need of treatment will be admitted Monday through Friday, from 9:00 a.m. to 5:00 p.m. and if necessary, after hours.
- Family Services – It is our firm conviction that unless family members and significant others are treated simultaneously with the chemically dependent person, the possibility of relapse increases. Special family sessions and intensive family education series programs are provided.

If the client is appropriate for admission, the admission, consent to treat and release forms are completed and more comprehensive assessments are begun.

When the paperwork is complete, program rules and client rights are reviewed in detail, and the client is orientated to the facility and introduced to fellow clients. Family members are appraised of the program components as well.

## VII. ASSESSMENTS

Client problems and needs are determined through a planned series of assessments.

- a. Pre-Admission Assessment  
Determines if the person is appropriate for mental health treatment, and considers Mental Health Assessments and Criteria
- b. Medical History/Assessment  
The Client completes as part of the intake process a Medical History/Assessment. It is used to determine whether the client has any immediate medical needs or any problems, which need to be included in treatment planning, and includes an emotional/behavioral assessment.
- c. Physician's History and Physical Assessment  
Within seven (7) days of admission to Residential Treatment programs, a comprehensive medical assessment must be done, based upon criteria established in consultation with and approved by the Medical Director.

The Medical Assessment includes:

1. History of chemical use,
  2. Review of systems to determine the possibility of infectious disease,
  3. Family history,
  4. Social history,
  5. Allergies,
  6. Physical examination (questionnaire form),
  7. Working Diagnosis,
  8. Lab tests (i.e., Urine Analysis, Serological Test for STDs, TB Screening, and other lab studies when indicated)
  9. Female Clients will be evaluated for the necessity of a pregnancy test; if indicated, will be provided through a referral,
  10. Physical/Sexual Abuse,
  11. Special nutritional needs,
  12. Speech, language, and hearing functions.
- d. Psychosocial Assessment

The Psychosocial Assessment is completed within five (5) working days of admission and includes the history and current status of:

1. Family,
  2. Social and cultural influences,
  3. Finances,
  4. Marital issues,
  5. Living arrangements,
  6. Legal issues,
  7. Use of leisure time,
  8. Social networks,
  9. Spiritual issues,
  10. Vocational/employment/educational issues,
  11. Sexual orientation,
  12. Abuse (physical and sexual),
  13. Military history.
- e. **Integrated Biopsychosocial Summary**  
The summary integrates the salient issues associated with the client's needs. The Integrated Summary serves as the basis for development of an individualized Treatment Plan and is completed within ten (10) working days of admission.

## **IX. TREATMENT PLANNING**

### **a. Initial Treatment Plan**

Clinical staff develops an Initial Treatment Plan at the time of the client's admission.

1. The Initial Treatment Plan addresses but is not limited to:
  - a. Immediate medical and nursing needs,
  - b. Any initial resistance to treatment,
  - c. Emotional and physical discomfort,
  - d. Emotional needs,
  - e. Safety needs,
  - f. Urgent personal business needs,
  - g. Special legal status.
2. The Initial Treatment Plan is used and updated as a guide until the Comprehensive Treatment Plan is developed.

### **b. Comprehensive Treatment Plan**



Treatment of all clients remaining in the program longer than five (5) days is guided by the Comprehensive Treatment Plan, which is developed by the interdisciplinary treatment team and documented by the Primary Counselor.

- The Therapist reviews all assessments and develops a comprehensive plan for the individual client's treatment.
- The Comprehensive Treatment Plan must be completed by the seventh (7<sup>th</sup>) working day of the client's stay; an interdisciplinary team review occurs at or prior to this juncture of treatment.
- The Treatment Plan reflects the philosophy of The Wave International, LLC and the input of the interdisciplinary team.
- The Treatment Plan addresses specific goals and objectives that are necessary for the client to attain, maintain, and/or re-establish
- Emotional / physical / spiritual health and growth and adaptive capabilities vital to recovery. It is based on the biopsychosocial assessment and the Integrated Summary.
- The Treatment Plan incorporates client input through the use of written assignments and the client's verbal input. The client's participation is documented in the Medical Record.
- The Treatment Plan identifies the criteria necessary for discharge.
- Where appropriate, there is a specific plan for family members or significant others. Additionally, there are specific educational elements provided to family members based on family assessment.
- Problems and needs identified as a result of assessments are noted on the Initial Treatment Plan and given a disposition identifying which issues are part of the Treatment Plan, Continuing Care Plan, or are not to be addressed in treatment.
- The objectives that are designated to achieve the treatment goals are stated in measurable terms, having a specified time for achievement, describing the service or action to meet the stated objective and specifying the frequency of treatment procedures.
- The Treatment Plan includes referral for needed services not provided directly by the program.
- All changes in Treatment Plans are documented in the Treatment Plan Review.

**c. Treatment Plan Review**

The Treatment Team meets weekly for the purpose of reviewing client progress, and to update the Treatment Plans.

1. When a client's progress is reviewed, the identified problem areas are discussed and the treatment efforts and plans for additional therapeutic intervention are outlined.
2. Results of the Treatment Plan Review are recorded in the Medical Record.

3. Any new assessment data is presented at the staffing and incorporated into the Treatment Plan Review.
4. Treatment Plan Reviews are conducted at least every thirty (30) days.

## **X. DISCHARGE PLANNING**

The Wave International, LLC adult discharge criteria are listed below.

Discharge Planning begins at the time of admission. Both immediate and long-term needs are identified on the Initial Treatment Plan. Problems that cannot be addressed in treatment are deferred to continuing care planning.

Prior to discharge, a Continuing Care Plan is developed for each client. The Continuing Care Plan will:

- Describe the activities, routines, new behaviors, and associations that the client is planning to adopt to maintain a sober life.
- Describe any professional services to which the client is being referred for continuing treatment.

The Plan will be developed with input from the client and, if feasible, with input from family, referring clinicians, the Employee Assistance Program, personnel, etc.

### **DISCHARGE CRITERIA**

- A. Discharge with approval/completion of treatment:
  1. Client has had a formal review by staff.
  2. Client and primary counselor have developed a continuing care which will summarize the client's progress in treatment and address future needs.
  3. Client has been linked to community resources.
- B. Discharge Unsuccessful Completion:
  1. Failure to exhibit progress related to client treatment goals as well as accepted program requirements.
  2. The Therapist must personally staff the client case with the Clinical Director prior to any determination of unsuccessful completion. Such a determination results from consistent, inadequate performance in spite of clinical intervention.
- C. Other Types of Discharge:

1. Administrative Discharge/Noncompliant with agency rules - A client may be administratively discharged when the treatment team determines that discharge would be in the best interest of the client and/or other clients in the program when the client is not compliant with agency rules and/or philosophy.
2. Clients will be administratively discharged for:
  - A. Using or possessing drugs on the premises.
  - B. Engaging in sexual interaction in the program, or on the premises.
  - C. Physical violence directed against another client, staff member, employee, or guest/visitor.
  - D. Consistent behavior which is disruptive and appears detrimental to other clients' treatment.
  - E. Failure to comply with "Client Expectations" in support of treatment procedures and/or consistent disregard or violation of client expectations.
  - F. When behavior, attitude, or lack of progress indicates to the treatment team that discharge would be in the best interest of the client and/or other clients in the program.

At such time as an administrative discharge is considered a possibility, the case will be presented to the treatment team at a staffing session. The client will be advised of the possibility of therapeutic discharge and be given the opportunity to share his/her personal views, opinions, and desires with the treatment team. The treatment team may recommend immediate discharge.

3. Against Medical Advice - Clients' may be discharged "Against Medical Advice," AMA, (those clients who are deemed to be medically unstable or against medical staff advice) wanting or by leaving the program either announced or unannounced. Clients who have been voluntarily admitted have the right to leave treatment on their own volition, however, the treatment team retains the responsibility of informing the client of the seriousness of their disease and the potential consequences of departing prior to the completion of treatment. Little can be accomplished for clients who leave without announcement. Such cases will be subject to QA review, ensuring all procedures were followed and determining if corrective action is appropriate.
4. A client who expresses wishes to leave AMA will discuss it with the most available staff member. This event will be appropriately documented. A therapeutic intervention will be held with the client, the treatment team, and/or supervisor to discuss the client's decision to terminate treatment.
5. Clients who announce that they are leaving the program AMA will be counseled by the first available staff member who can ascertain the rationale behind the decision and explain the relapse risks, potential consequences of

relapse, and consequences of departing prior to completion of treatment.

- A. The client's peers may be mobilized to share their concern over early departure.
- B. The client's primary counselor will be notified and given the opportunity to share with the client.
- C. The client's family members and other significant persons will be notified with proper consent and given the opportunity to share with the client.
- D. Other treatment team members who are present will, as appropriate or in the absence of key persons listed above, share with the client the positive rationale for remaining in treatment versus the potential negative consequences of leaving treatment.
- E. When all reasonable efforts to influence the client to remain in treatment have been exhausted, the client will be asked to sign an AMA release of liability form, escorted to the reception area, and allowed to depart.
- F. Clients who leave without notification to staff will be considered to have eloped and will be immediately discharged as AMA.

## **PART IV: PROFESSIONAL STAFF:**

### **XI. PROFESSIONAL STAFF AND ORGANIZATION OF SERVICES**

#### a. Staff and Staff Responsibilities

- **Medical Director, Physician and ARNP**  
The Medical Director is responsible for supervision of all medical services and for ordering consultations and is on call twenty-four (24) hours a day, seven (7) days a week. The Wave will contract with or employ an ARNP who will be the backup to the Medical Director.
- **Psychiatrist**  
Consulting Psychiatrists (if not the current Medical Director) are scheduled to provide psychiatric consultations for clients as indicated. The Medical Director or Physician provides medications as needed to clients based on their Psychiatric Assessments.
- **RN**  
A contracted RN is responsible for (a) assisting the Physician and ARNP in facilitating medical services for clients, (b) the management of the storage and self-administration of medication, and (c) administration of the infection

control program and is on call twenty-four (24) hours a day, seven (7) days a week.

- **Clinical Director**  
The Clinical Director is responsible for the supervision of clinical services and is on call twenty-four (24) hours a day, seven (7) days a week.
- **Chief Executive Officer**  
The CEO is responsible for providing strategic leadership for the company by working with the Board of Directors (if other than the CEO) and the Executive Management Team to establish long-range goals, strategies, plans and policies; and is on call twenty-four (24) hours a day, seven (7) days a week to the Executive Team.
- **Chief Operating Officer**  
The COO is part of the Executive Team and is responsible for the overall direction of The Wave International, LLC Treatment Programs under the direction of the CEO; to act on behalf of the Agency and assist in promoting Agency growth, maintain DCF licensure and JC Accreditation, Quality Assurance and Quality Improvement; and is on call twenty-four (24) hours a day, seven (7) days a week to the Executive Team.
- **Executive Director**  
The Executive Director is part of the Executive Team and is responsible for the overall direction of The Wave International, LLC Treatment Programs under the direction of the CEO and COO; to act on behalf of the Agency and assist in promoting Agency growth, maintain licensure and JC Accreditation, Quality Assurance and Quality Improvement; and, is on call twenty-four (24) hours a day, seven (7) days a week to the Executive Team and the Supervisors that report to the Executive Director.
- **Therapists**  
Therapists are responsible for planning, conducting, and documenting treatment activities and providing case management services for the clients under the Supervision of the Executive/Clinical Director.
- **The Wellness Support Techs (WSTs) Supervisor and WSTs** - are responsible for supervising client activities, documentation, transporting and assisting clients. WSTs provide medication monitoring and may conduct selected groups under the supervision of the Clinical and Program Director.

b. Staffing Patterns and Specific Functions

Histories, physicals, and medical care are provided at the office of the client's personal physician or at the office of an The Wave International, LLC contracted physician or psychiatric.

The Medical Director supervises medical care and communicates with the facility weekly to participate in overall client medical care. The Medical Director is on call 24 hours a day, 7 days a week.

A licensed, employee or contracted RN is on call twenty-four (24) hours a day, seven (7) days a week, on an emergency basis.

Members of the counseling staff are on duty weekdays from 8:00 a.m. until 10:00 p.m. and Saturdays and Sundays from 8:00 a.m. to 3:00 p.m., and on call twenty-four (24) hours a day, seven (7) days a week.

c. Clinical Services

The Clinical Director, in weekly client staffing meetings supervises all non-medical treatment services. The purpose of these meetings is to review client progress and deal with problems and factors that affect treatment. It is at these meetings that formal treatment plan reviews are held. The Clinical Director also conducts brief daily meetings with on-duty clinical staff to discuss issues that need to be dealt with that day.

The Clinical Director consults weekly with the Medical Director and/or ARNP relative to client status and care.

The LPN or RN reports to the Medical Director, Clinical Director, and Executive Director.

All department heads belong to the Executive Committee, which meets monthly to improve working relationships, develops policies and procedures, and promotes and oversees quality improvement.

The Wave International, LLC has a council of Executive and Clinical Leaders who meet at least once each year to approve the Written Plan and bring their issues to the CEO. The CEO represents the professional staff and their interests to management through the management committee.

d. Supervision

The COO, Clinical Director and Management Team are responsible for hiring and supervising all non-medical clinical staff and for ensuring that each staff member is competent to perform assigned job responsibilities. The CEO and COO oversee the credentialing process, and meets with other clinical leadership members, as needed, to review credentials and recommend privileging to the Governing Body.

The Clinical Director and Management Team oversee weekly staffing meetings and meet with on-duty staff each weekday morning. The Clinical Director meets with each Therapist at least once per month to provide formal supervision and sits in on groups, individual counseling, and others knowledgeable about staff competencies. Formal supervision involves a scoring of performance criteria to make the process as objective as possible. The Clinical Director also conducts annual staff evaluations.

Members of the clinical staff are evaluated annually based upon the COO, Clinical Director and Management Team's observations of client staff meetings, formal supervision, the privileging process (initial and reappointment), and day-to-day indicators of clinical strengths and weaknesses.

e. Hours of Operation

Service Hours: Twenty-four Hours a Day, Seven Days a Week

Business Hours: Monday through Friday, 9:00 a.m. to 5:00 p.m.

# The Wave International, LLC

## Residential Treatment Facility

The Wave International, LLC is registered as a “for profit” LLC corporation providing Mental health residential treatment services for people with a primary psychiatric diagnosis in accord with the criteria set forth in DSM-5.

The Level II facility will provide a structured group treatment setting with 24-hour per day, 7 days per week supervision for residents who range from those who have significant deficits in independent living skills and need extensive supervision, support, and assistance, to those who have achieved a limited capacity for independent living, but who require frequent supervision, support and assistance.

### Patient Demographics:

All patients accepted for treatment at The Wave International, LLC will have a primary mental health diagnosis as defined by the DSM-5. The Projected demographic distribution of patients is as follows:

Primary Diagnosis:	65% Major Depression, 20% Bi-Polar Disorder, 15% Anxiety Disorders
Secondary Diagnosis:	50% E.D, 25% C.D, 25% other/ Axis II, BPD
Age Range	32% Range 18-25 48% Range 26-45 20% above 46 years
Referral Sources:	Out of Area = 50% (e.g out of state) Local Residents 50%
Education	61% two or more years college 26% less than two years college 13% graduate school
Length of stay	Will vary
Payment	Self Pay/Out of Network Insurance/In-network partnerships

### Residential Revenue and Funding:



The Wave International, LLC uses a variety of different methods to propose potential services to clients. These include using Google ads, social media outreach, referral sources and community relationships.

Clients are a mixture of self-pay, out of network insurance and certain in-network insurance contracts we facilitate. An example of an in-network insurance contract we accept would be our partnership with Tri-Care for veterans with mental health needs.

Funding for the project is through private equity.