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## **Accreditation Report – USD Student Counseling Center**

**Date of Review: February 25, 2022**

**Accreditation Outcome: Three Year Accreditation**

### **REVIEW PROCESS:**

The University of South Dakota Student Counseling Center was reviewed by The Department of Social Services, Office of Licensing and Accreditation for adherence to the Administrative Rules of South Dakota (ARSD) in regard to Substance Use Disorders on February 25, 2021. This report contains the following:

- Agency Summary
- Interview Results
- Stakeholder Results
- Administrative and Client Case Record Findings
- Areas Requiring a Plan of Correction
- Prior Areas Addressed in Previous Review
- Accreditation Results

The accreditation results are derived from an administrative score which includes the scoring of policies and procedures and personnel files, the client case record scores, and an overall cumulative score. The level of accreditation status is based on the overall cumulative score.

### **AGENCY SUMMARY:**

USD Student Counseling Center is the outpatient mental health and substance use disorder provider for the students of the University of South Dakota, located in Vermillion, SD. The agency is seeking to renew accreditation for prevention services and outpatient substance use disorder (SUD) services.

Debra Robertson is the director of the USD Student Counseling Center. In addition to prevention services and outpatient substance use disorder services the USD Student Counseling Center also provides individual and group mental health counseling, couples counseling, crisis intervention, case management services, and self-help resources. They help people in areas including, but not limited to: anxiety, depression, eating disorders, substance use, and trauma. The USD Student Counseling Center provides services specifically to the students of USD, and does not charge any student to receive services.

### **INTERVIEW RESULTS:**

**Description:** The Department of Social Services, Office of Licensing and Accreditation completes confidential interviews with consenting clients and staff of the agency as part of the accreditation process. The interviews are not a scored component of the accreditation review. However, the information obtained in the interviews is used for quality improvement of the agency.

*Interviews were completed with agency staff. There were no concerns noted. Staff describe a healthy and cohesive team who work together to provide quality services to clients. At this time, some of the staff are located in a separate building on campus. There are plans to move to a new, larger location in 2023, where there will be space for all staff.*

*No clients volunteered to be interviewed.*

### **STAKEHOLDER SURVEY:**

**Description:** Stakeholder Survey data is collected once a year for all accredited mental health and substance use disorder agencies. As part of the survey process, accredited agencies are asked to share the survey with at least three stakeholders in their community. In addition, feedback is gathered from the Department of Corrections (DOC), Unified Judicial System (UJS), and Child Protection Services (CPS) regarding the accredited agencies. The surveys are not a scored component of the accreditation review however the information obtained in the survey results is used for quality improvement of the agency.

*Stakeholder results were sent out and collected over the past three years. USD Student Counseling Center received a total of 10 stakeholder responses. One stakeholder shared that USD Student Counseling Center accommodates students well. Another stakeholder shared that they can be hard to get ahold of.*

### **AREAS REQUIRED FOR PLANS OF CORRECTION:**

**Description:** The following areas will require a plan of correction to address the rules of non-compliance which shall include an updated policy and/or procedure, a time frame for implementation of this procedure, the staff position or title responsible for implementation and the staff position or title responsible for ensuring continued compliance of these rules.

1. USD Student Counseling Center's contract with the Division of Behavioral Health requires the SUD program to publicize priority services for pregnant

women, women with dependent children, and IV drug users and maintain a record of the programming or outreach services.

*USD Student Counseling Center did not have priority services for pregnant women, women with dependent children, or IV drug users publicized.*

2. According to ARSD 67:61:06:02, a client has rights guaranteed under the constitution and laws of the United States and the state of South Dakota including:
  - The right to refuse extraordinary treatment as provided in SDCL 27-12-3.22;
  - The right to be free of any exploitation or abuse;
  - The right to seek and have access to legal counsel;
  - To have access to an advocate as defined in subdivision 67:61:01:01(4) or an employee of the state's designated protection and advocacy system;
  - The right to confidentiality of all records, correspondence, and information relating to assessment, diagnosis, and treatment in accordance with the confidentiality of records requirements of the Substance Abuse and Mental Health Services Administration, 42 U.S.C. 290 dd-2 (January 7, 2011), the confidentiality of alcohol and drug abuse patient records, 12 C.F.R. Part 2 (June 9, 1987), and the security and privacy of HIPAA, 45 C.F.R. Part 160 and 164 (September 26, 2016); and
  - The right to participate in decision making related to treatment, to the greatest extent possible.

*USD Counseling Center did not have the right to an advocate included in their client rights within their policy and procedure manual or client handbook.*

3. According to ARSD 67:61:05:12, each agency shall routinely check the Office of the Inspector General's List of Excluded Individuals and Entities to ensure that each new hire as well as any current employee is not on the excluded list. No payment may be provided for services furnished by an excluded individual. Documentation that this has been completed shall be placed in the employee's personnel file.

*USD Student Counseling Center did not have record of a check of the Inspector General's Medicaid Exclusion List documented in any of the reviewed personnel files upon hire or routinely. In order for USD Student*

*Counseling Center to meet the "routine" requirement, the exclusion list must be checked for each clinical employee at least annually.*

4. According to ARSD 67:61:07:06, an addiction counselor or counselor trainee shall develop an individualized treatment plan based upon the integrated assessment for each client admitted to an outpatient treatment program, intensive outpatient treatment program, day treatment program, clinically-managed low-intensity residential treatment program, or medically-monitored intensive inpatient treatment program.

The individualized treatment plan shall be developed within 30 calendar days of the client's admission for a counseling services program. All treatment plans shall be reviewed, signed, and dated by the addiction counselor or counselor trainee. A signature must be followed by the counselor's credentials.

*USD Student Counseling Center did not have treatment plans developed or signed within 30 days of admission in two out of two applicable client files.*

5. According to ARSD 67:61:07:07, the program shall document for each client the progress and reasons for retaining the client at the present level of care; and an individualized plan of action to address the reasons for retaining the individual in the present level of care. This document is maintained in the client case record. It is appropriate to retain the client at the present level of care if:
  - The client is making progress, but has not yet achieved the goals articulated in the individualized treatment plan. Continued treatment at the present level of care is assessed as necessary to permit the client to continue to work toward his or her treatment goals; or
  - The client is not yet making progress, but has the capacity to resolve his or her problems. He or she is actively working toward the goals articulated in the individualized treatment plan. Continued treatment at the present level of care is assessed as necessary to permit the client to continue to work toward his or her treatment goals;
  - New problems have been identified that are appropriately treated at the present level of care. The new problem or priority requires

services, the frequency and intensity of which can only be safely delivered by continued stay in the current level of care. The level of care in which the client is receiving treatment is therefore the least intensive level at which the client's new problems can be addressed effectively.

The individualized plan of action to address the reasons for retaining the individual in the present level of care shall be documented every 14 calendar days early intervention services and 30 calendar days for outpatient treatment programs.

*USD Student Counseling Center did not have continued service criteria or a plan of action to address the reasons for retaining the client at the present level of care every 14 days in any of the 5 applicable early intervention files reviewed.*

*Additionally, individualized plans of action were documented at least every 30 days for the two applicable outpatient treatment files reviewed, however the language laid out in ARSD was not used, so it was difficult to determine if the plan of action was addressing continued service criteria specifically.*

*It is recommended that USD Student Center add the continued service criteria language to their progress notes, so it is clear what their individualized plans of action are addressing.*

**PRIOR AREAS REQUIRING A PLAN OF CORRECTION:**

**Description:** USD Student Counseling Center was last reviewed by the Department of Social Services, Office of Licensing and Accreditation March 2019. The 2019 review identified one area requiring a plan of correction. That area was resolved and found to be in compliance for this review.

**ACCREDITATION RESULTS:**

X	Three Year Accreditation (90%-100%)
	Two Year Accreditation (70%-89%)
	Probation (69% and below)