



## **FULL LIFE COUNSELING'S PRACTICE POLICIES – Effective Date 01/04/2021**

Please make a point of reading this information carefully! We want to be sure you are aware of all of our relevant policies and procedures that could affect your privacy, safety and finances. We also appreciate that it is a long document that you may find hard to read and that it is full of details that you may find hard to remember. After you have reviewed these and other documents, you will be able to download a signed copy for your records. Additional copies of these and all practice documents are available upon request by calling 336-923-7426, ext. 0.

**APPOINTMENTS AND CANCELLATIONS** - All services are by appointment only. Most individual, couples and family sessions are 53-58 minutes in length, with intervention & emergency services by special arrangement. Groups range from 1-3 hours. Please remember to cancel or reschedule 24 hours in advance. You will be responsible for the entire fee (less \$1) if your cancellation is communicated in less than 24 hours. This is necessary because a time commitment is made to you and is held exclusively for you. Another client can benefit from that time if you provide us enough notice to offer it to someone else. If you are late for a session, you may lose some of that session time. While most sessions are approximately 55 minutes, it is up to you, however, to determine the length of time of your sessions. Requests to change the session length need to be discussed with the therapist in order for time to be scheduled in advance.

**OPERATION ADJUSTMENTS DUE TO INCLEMENT WEATHER OR PUBLIC HEALTH CONCERNS** - Our business office will be closed on *some* of the same days that the Winston-Salem Forsyth County Schools are closed. Exceptions are when the WSFCS elect to close due to weather predictions rather than actual inclement weather. When inclement weather could affect safe travel for clients, regardless of whether the office is closed for staff, Full Life counselors may or may not offer to “meet” with you for a video-session or phone-session. Depending on the circumstances of the client and counselor, this decision will be made on a case-by-case basis. Video-sessions and phone-sessions are only recommended as an occasional substitute for face-to-face sessions, but they are a good way of helping maintain the continuity of care when weather might otherwise result in cancelling the session. To verify if the office is open and/or if your counselor intends to meet as scheduled on a “snow/ice day,” we recommend that you call your counselor’s extension to reach them. When in doubt, please check WXII-TV for closure notices and/or call our office to verify. COVID-19 public health concerns may result in some or all services transitioning to telemedicine rather than in-person sessions for the health and safety of our clients, their family members, our team and our own family members.

**LOCATION FOR SERVICES** - FLC sessions most typically occur at our office located at 983 Mar-Don Dr., Winston-Salem, NC 27104. Telemedicine services using HIPAA-compliant video conferencing services are available, as well as some in-person services off-site. These can include “walk and talk therapy” during which the counselor and client may elect to go outside and walk or engage in other therapeutic activities outside or equine-assisted psychotherapy on the grounds of privately-owned farms, or off-site services you request. While we have business associate agreements binding farm owners and their employees from disclosing information about our clients, we have no way of securing such protections from members of the general public that could be on-premises. Any in-person service that occurs outside the confines of our office building or HIPAA-compliant telemedicine platform could be observed by the general public and content of discussion could be overheard. Any adult client who consents (or minor client whose parent consents) for such services is, by virtue of electing to participate, waiving elements of confidentiality that are outside of our control. Telemedicine sessions may occur from locations

chosen by client and counselor but should provide adequate privacy to maintain confidentiality and professionalism in sessions.

**FEES, PAYMENTS, INSURANCE AND DOCUMENTATION** - A signed Financial Agreement is required for all clients. Fee schedules, payment arrangements, insurance explanations, and documentation requests are all addressed on the Financial Agreement. Full Life is an OUT-OF-NETWORK provider with most insurance companies. We are only in-network with CBHA (Carolina Behavioral Health Alliance). Fee changes do occur and are posted prominently in the lobby, in counselors' offices, on our website and in periodic newsletters. Fees are subject to change, but all fee changes are announced 30 days in advance with prominent posting in the office. In the event of financial hardship, we will attempt to problem-solve and collaborate with long-term, well-established clients who seek a short-term solution to allow counseling to continue. If no such solution can be agreed upon, we will carefully and thoughtfully arrange for you to be referred to another provider whose services you can afford. We utilize HIPAA compliant electronic health records, which are web-based and include electronic storage of protected health information including client accounts and information which may be submitted to insurance companies. For additional information, please review our Financial Agreement closely. Effective 1/1/2021, we utilize STRIPE merchant account services for processing of payments using credit/debit/HSA/flex cards. When clients elect to pay for services using a credit/debit/flex card, the merchant account will report the transaction with "Full Life" to your financial institution, which will therefore appear on monthly statements and bank records.

Effective 12/28/2020, we began a transition for all active clients and all new clients to enter personal financial information into STRIPE through Simple Practice, thus ceasing the practice of receiving personal credit/debit/flex card information by our office. This important effort of arranging for clients/guarantors to directly enter credit/debit/flex card information into STRIPE provides our clients and their guarantors the maximum level of security for your credit/debit/flex card information. Until 2/1/2021, we may also continue to utilize BB&T/Truist and Theranest payment portals for merchant account services until all accounts have transitioned to STRIPE and Simple Practice.

**TELEPHONE ACCESSIBILITY** - If you need to contact us between sessions, please leave a message on our general delivery voice mail or your counselor's voicemail. Counselors are often not immediately available; however, we will attempt to return your call within 24 hours. Crisis support is available through our Crisis Line afterhours, on weekends or holidays, but only for active clients not experiencing a life-threatening emergency. If a life-threatening emergency situation arises, please call 911 or go to any local emergency room.

**COMMUNICATIONS ON YOUR BEHALF** - HIPAA and 42 CFR Part 2 inform our policies and procedures for confirming/denying requests for information or records. All clients have protections under HIPAA, and those with a substance use disorder diagnosis have additional protections under 42 CFR Part 2. All clients are asked to complete a Communications Consent to provide explicit permission for us to communicate with your counseling supports (i.e., family, partner, friend, sponsor) and your defined preferences regarding methods of communication. Disclosure of some PHI requires explicit written consent. Individualized Release of Information forms are in effect for one year unless otherwise specified.

Although Communications Consents and individualized Release of Information forms may be signed at intake, clients are permitted to amend, suspend, or revoke consents at any time.

**SOCIAL MEDIA AND TELECOMMUNICATION** - Due to the importance of your confidentiality and the importance of minimizing dual relationships, our counselors will not accept invitations to be "Friends" on social media using their personal profiles. This is in keeping with maintaining professional boundaries with clients. Although the Full Life Counseling and Parent-to-Parent pages and Twitter feeds are privacy-protected to the extent possible, individuals who choose to "like" or "follow" our pages are responsible for establishing their own privacy

settings to protect themselves from the public identifying a relationship with us. We believe that adding clients as friends or contacts on social media sites can compromise your confidentiality and our respective privacy. It may also blur the boundaries of our therapeutic relationship. If you have questions about this, please bring them up when we meet and we can talk more about it.

**ELECTRONIC COMMUNICATION** - We cannot ensure the confidentiality of any form of communication through electronic media, including traditional text messages. If you prefer to communicate via email or text messaging for issues regarding scheduling or cancellations, we will do so, but further exchanges are discouraged. While we may try to return messages in a timely manner, we cannot guarantee immediate response and request that you do not use these methods of communication to discuss therapeutic content and/or request assistance for emergencies. Services by electronic means, including but not limited to telephone communication, the Internet, facsimile machines, and e-mail is considered telemedicine by the State of North Carolina. We utilize only HIPAA-compliant telemedicine platforms such as our Business License with Zoom, Simple Practice for our electronic medical record and secure messaging via email, appointment reminders via Simple Practice, Signal for secure text messaging, and HIPAA-compliant email using our Business License with G Suite. Please remember that emails and text messages are considered part of the medical record and therefore are worthy of the same confidentiality as other parts of your medical record.

**TELEMEDICINE CONSENT** - We believe that telemedicine offers therapeutic value comparable to in-person sessions and groups and have thus utilized HIPAA-compliant telemedicine resources since 2017. Besides convenience for clients, telemedicine sessions allow accommodations for public health restrictions (i.e., best practices to minimize exposure to COVID-19), snow days, sick days and other circumstances. Those exclusively choose telemedicine sessions may be required to present proof of identity at the beginning of the counseling relationship.

When telemedicine resources are utilized, clients and counselors are both required to arrange for privacy, minimal background noise, sufficient clothing, abstinence from alcohol or other intoxicating drugs or medications, appropriate behavior, and focused attention. In the event that these conditions are not met, your counselor will bring this to your attention immediately. If appropriate adjustments are not made, your counselor may terminate the session. You will be financially responsible for the session as originally scheduled.

Under North Carolina law, telemedicine is broadly defined as the use of information technology to deliver medical services and information from one location to another. If you and your therapist chose to use information technology for some or all of your treatment, you need to understand that: (1) You retain the option to withhold or withdraw consent at any time without affecting the right to future care or treatment or risking the loss or withdrawal of any program benefits to which you would otherwise be entitled. (2) All existing confidentiality protections are equally applicable. (3) Your access to all medical information transmitted during a telemedicine consultation is guaranteed, and copies of this information are available for a reasonable fee. (4) Dissemination of any of your identifiable images or information from the telemedicine interaction to researchers or other entities shall not occur without your consent. (5) There are potential risks, consequences, and benefits of telemedicine. Potential benefits include, but are not limited to improved communication capabilities, providing convenient access to up-to-date information, consultations, support, reduced costs, improved quality, change in the conditions of practice, improved access to therapy, better continuity of care, and reduction of lost work time and travel costs.

Effective therapy is often facilitated when the therapist gathers within a session or a series of sessions, a multitude of observations, information, and experiences about the client. Therapists may make clinical assessments, diagnosis, and interventions based ~ not only on direct verbal or auditory communications, written reports, and third person consultations ~ but also from direct visual and olfactory observations, information, and experiences. When using information technology in therapy services, potential risks include, but are not limited to the therapist's

inability to make visual and olfactory observations of clinically or therapeutically potentially relevant issues such as: your physical condition including deformities, apparent height and weight, body type, attractiveness relative to social and cultural norms or standards, gait and motor coordination, posture, work speed, any noteworthy mannerism or gestures, physical or medical conditions including bruises or injuries, basic grooming and hygiene including appropriateness of dress, eye contact (including any changes in the previously listed issues), sex, chronological and apparent age, ethnicity, facial and body language, and congruence of language and facial or bodily expression. Potential consequences thus include the therapist not being aware of what he or she would consider important information, that you may not recognize as significant to present verbally the therapist.

**MINORS** - If you are a minor, your parents may be legally entitled to some information about your therapy. Exceptions may apply for minors seeking services for substance-related issues. 42 CFR Part 2 provides additional rights to those seeking services for substance use disorders, therefore express written consent will be required to release information to anyone, including parents of minors. We will discuss with you and your parents what information is appropriate for them to receive and which issues are more appropriately kept confidential.

## **SAFETY FOR OUR CLIENTS, VISITORS, EMPLOYEES AND VISITORS**

*Thankfully, Full Life is a tranquil, safe and comfortable place “to figure some things out.” It’s true, though, that life is not always tranquil and comfortable, but we are committed to doing everything we can to maintain a safe environment. Our licensure by the State of NC requires that we adopt and communicate certain policies and procedures to follow in the event of extraordinary circumstances, some of which are stated below. Thankfully, except for our need to respond to emergencies and crises, we have rarely needed to respond to any of the others, so we hope you are not alarmed by the following protocols.*

**EMERGENCIES & CRISES** - If you or a family member is experiencing a life-threatening emergency, you should go directly to your nearest emergency department or call 911.

Even if you request support from your counselor or our on-call clinician, arranging for emergency assistance should still be the first step in addressing the emergency. If you or a family member experiences a non-life threatening crisis and needs support from a counselor in the evenings or on a weekend/holiday, please call our Crisis Line at 336-923-7426, extension 702. A response from the counselor-on-call should follow within 1-2 hours.

If you or a family member is experiencing a non-life-threatening crisis and needs support from a counselor during regular business hours, please do NOT call the Crisis Line. Please call our main number at 336-923-7426, ext 0 or ext 709. This will ensure that a counselor gets your message much more promptly.

If the crisis is escalating and you are not sure if it constitutes an emergency, an alternative for support is available through Cardinal Innovations. Cardinal can arrange for a Mobile Crisis Assessment which, if appropriate, would arrange for a mental health professional to come to the home to assess the situation. That number is 888-235-4673.

**TRANSPORTATION OF CLIENTS** – During some services, staff members may offer transportation services to assist individuals and families with accessing help. All adults receiving transportation services do so voluntarily and assume responsibility for their own safety, thus waiving Full Life Counseling, PLLC and its employees from any responsibility for injury, loss, or damage to personal property while being transported as part of delivery of requested services. Parents of minors who are recipients of transportation services will be asked to complete notarized documents recognizing one or more Full Life Counseling staff members as temporary legal guardians to allow for emergency care, if needed, in the parent’s absence. Parents will be contacted immediately in the event of

any emergency. Parents and legal guardians of minor children served by us in this capacity waive Full Life Counseling and its employees from any responsibility for injury, loss, or damage to personal property while being transported as part of delivery of requested services.

**RESPONSES TO AGGRESSIVE BEHAVIOR** - In the event that any client, family member or visitor demonstrates aggressive behavior on Full Life premises, staff will actively encourage the individual to take a walk, get some fresh air or leave the premises if necessary to avoid acting on impulses to be destructive to persons or property. Law enforcement could be called if necessary to protect the safety of the individual or others. Full Life staff are prohibited from using any form of restrictive intervention or restraint. There are no seclusion areas, no restraint devices or equipment, and staff are trained to utilize only verbal de-escalation skills if a client, family member or visitor becomes aggressive. The only circumstance in which any Full Life staff member should ever touch a client is when all of the following conditions are met: with permission, for the express purpose of offering support and encouragement, and in an expressly non-sexual manner. No use of physical restraint is ever used unless there is literally the perception of a life-threatening emergency. Similarly, no Full Life client, family member, visitor or staff should be subject to abusive, violent or aggressively disrespectful treatment from a client. If such behavior is demonstrated by a client, law enforcement may be called and/or expulsion from services may be necessary. If so, you are entitled to appeal that decision and/or file a grievance as noted below.

**WEAPONS, SUBSTANCES, & AGGRESSIVE ANIMALS** - It is important for us to maintain a safe environment both for clients, team members, family members and guests of our programs. Therefore, we respectfully ask everyone to refrain from bringing any weapon, drug paraphernalia, controlled substance, or aggressive animal onto the premises. Although we hope to never need to do so, we reserve the right to ask anyone on the premises to empty their pockets and/or allow themselves to be searched if we have reason to believe that you are in possession of a weapon, paraphernalia, or controlled substance. Prohibited items, if found, will be confiscated. Alcohol be poured out, needles disposed of in our SHARPS container, pills disposed of with the assistance of a local pharmacy, and illegal drugs and paraphernalia disposed of with the assistance of local law enforcement. Pocket knives will not be confiscated, and any weapon that is not used to threaten or otherwise disrupt the milieu could be confiscated and returned to the owner upon leaving the premises. Clients will be given the option to take any weapon to their vehicle for safe storage but will be expected to honor the “no weapons” posted sign in the future.

**MEDICATIONS** - It is not uncommon for Full Life clients to have medication needs to treat co-occurring psychiatric or physical conditions. We encourage collaboration between your counselor and your prescribing physician(s), particularly if recovery could be at risk due to the need to effectively manage symptoms, prevent relapse or avoid accidental intoxication or dependency to a controlled medication. Medications should not be taken on the Full Life premises. Please take your medications on the prescribed schedule before you come to sessions or groups at Full Life. If you have a headache or other unexpected need for medications, you may want to keep those medications in your personal vehicle.

**SMOKING** - While possession of lighters, combustible tobacco, vapes and e-cigarettes on our premises is permitted, use of them inside any Full Life property is expressly prohibited. Those who wish to smoke outside must utilize the designated smoking area away from the front door entryway.

**COMPLAINTS** - All licensed and certified professionals in NC must honor ethical principles and standards of practice as recommended by our credentialing bodies. These principles and standards require that we provide you information about how to complain or seek advocacy if you are displeased with our services.



All of our clinicians abide by the codes of ethics according to their credentialing organization's national standards, such as those from the American Counseling Association, National Association of Social Workers, or the National Association of Drug and Alcohol Counselors.

If you believe that you have been treated unfairly or treated unethically, please notify Ginny Mills immediately. If you do not feel comfortable voicing your concerns to Ginny Mills verbally, you may submit your concerns via US Mail to our office, located at 983 Mar Don Dr., Winston-Salem, NC 27104 or file a concern, grievance or complaint with the appropriate credentialing board.

- NC Board of Licensed Clinical Mental Health Counselors, PO Box 77819 Greensboro, NC 27417. Phone: 336-217-6007. Fax: 336-217-9450 E-mail: [LPCinfo@ncblpc.org](mailto:LPCinfo@ncblpc.org)
- NC Substance Abuse Professional Practice Board, PO Box 10126, Raleigh, NC 27605  
<https://www.ncsappb.org/ethical-complaint-form/>
- NC Social Work Board, <https://www.ncswboard.org/page/complaintdisciplinary-process.html>.

**TERMINATION** Ending relationships can be difficult. Therefore, it is important to have a termination process in order to achieve some closure. The appropriate length of the termination depends on the length and intensity of the treatment. We may terminate treatment after appropriate discussion with you and a termination process if we determine that the psychotherapy is not being effectively used or if you are in default on payment. We will not terminate the therapeutic relationship without first attempting to discuss and explore with you the reasons and purpose of terminating. If therapy is terminated for any reason or you request another therapist, we will provide you with a list of qualified psychotherapists to treat you. You may also choose someone on your own or from another referral source.

Should you discontinue sessions, we will attempt to reach you. If you do not respond to such efforts and/or do not engage in services for 30 days, we will conclude that you are electing to discontinue services. Unless other arrangements have been made in advance, for legal and ethical reasons, we will administratively close your record. We must then consider that course of treatment as closed.

It is not at all uncommon, though, to return to services after a period of inactivity. In general, we welcome you to return to services as long as your clinical needs are appropriate for our services. You will be asked to renew your enrollment by completing intake documents again, primarily to allow you to become informed of any policy, fee, or service changes since you last received services and to ensure that we have current information about you.

**ACCESSING THIS INFORMATION IN THE FUTURE** – We appreciate that this is a long document that you may find hard to read and that it is full of details that you may find hard to remember. Copies of these and all practice documents is available upon request by calling 336-923-7426, ext. 0.

## SUMMARY

At Full Life, our team of dedicated professionals provide individualized, compassionate, innovative, and timely care to individuals, families, and couples seeking counseling and other therapeutic services. You may come and go from our services as your life circumstances, recovery, symptoms or needs change, and that is just fine by us. Life ebbs and flows, and we hope you will recognize Full Life as your counseling home when you simply need a safe place to figure some things out — about life, alcohol, drugs, coping, grief, sexuality, spirituality, trauma, relationships and more. It is our honor to be on the journey with you. If you have any questions about the elements described in this document, please speak with Charlie Lawson, Cristina Mounts, or your counselor for more information.