# Exhibit 4

## BSAS contract compliance review of MASH

**Source**

DPH public records production, request BSAS-2025-35, first production, pages 145 to 156.

**Redactions**

Redactions made by the producing agency are preserved as produced. In addition to those, the Vanderburgh Foundation has redacted email addresses and telephone numbers, and the names of individual sober homes and programs. Our redactions are solid black boxes. Nothing else has been altered; pages appear in their original order.

MASH Sober Housing Certification – Contract Compliance

## *I. Certify Sober Homes Using National Standards:*

| Responsibility | Detail | Notes |
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| **A. Maintain affiliate status with the National Alliance of Recovery Residences (NARR)**<br><br>**THIS APPEARS TO BE CORRECTED AND ONGOING. HOWEVER, WE HAVE DISCUSSED MASH PARTICIPATION IN DECISION-MAKING NARR COMMITTEES AND/OR AFFILIATE COMMITTEE** | • Renew affiliate status with NARR<br>• Participate in monthly NARR calls<br>• Attend annual NARR Best Practices Conference | MASH participation in NARR calls has been sporadic (once in 10 months) |
| **B. Conduct outreach to sober homes interested in or seeking certification using Massachusetts standards**<br><br>**THIS CONSTANTLY NEEDS TO BE MONITORED.** | • Answer telephone, email and in-person queries about the certification process and standards<br>• Reach out to uncertified sober homes to explain the benefits and process of certification<br>• Organize and plan informational events for sober homes who might be interested in certification across different regions of the state | No reported outreach to uncertified sober homes.<br><br>MASH reports no informational events held yet in FY18.<br><br>MASH reports that it intends to hold regional meetings for both certified and uncertified homes in Western and SE regions in April 2018, but has not determined a date or location. MASH did not respond to questions about whether it intends to hold events in other regions. |
| **C. Provide information and technical assistance regarding the certification process to sober homes seeking certification**<br><br>**THIS NOW REQUIRES MONITORING: FREQUENTLY CLARIFYING DEFINITION OF TA TO BE** | • Answer telephone, email and in-person queries about the certification process and standards<br>• Maintain thorough knowledge of certification standards | |

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| | **PROVIDED** | | |
| D. | **Receive applications for sober home certification and review applications for compliance with the Massachusetts standards**<br><br>**THIS HAS BEEN CORRECTED** | • Receive and file applications<br>• Create electronic record for each sober home in MASH Management System (MMS)<br>• Review and read all components of sober home applications and all accompanying documents for compliance with Massachusetts standards<br>• Inform operator of any deficiencies in the application and offer opportunity and guidance for remediation | MASH has erroneously certified facilities that are not sober homes, including BSAS-funded supportive case management programs [redacted] and treatment programs [redacted] Other ineligible organizations have also been certified (e.g., [redacted] |
| E. | **Using the MASH management system (MMS), communicate with inspection vendor about houses ready for inspection**<br><br>**THIS HAS BEEN CORRECTED; IF IT BECOMES A PROBLEM AGAIN JOHN NOTIFIES BSAS** | • Notify RHC when a home's application is complete and the home is ready for inspection | MASH unnecessarily overwhelmed RHC with 60+ requests for re-certification inspections at once. |
| F. | **Receive and keep records of information from inspection vendor about sober homes' inspection status**<br><br>**THIS HAS BEEN CORRECTED; IF IT BECOMES A PROBLEM AGAIN JOHN NOTIFIES BSAS** | • Preserve inspection record in MMS<br>• Maintain RHC access to inspection tab in MMS | MASH has repeatedly removed or requested to remove RHC access to the MASH Management System (MMS). |
| G. | **Arrange with the sober homes inspection vendor to inspect and certify sober homes that have affiliation with the vendor organization** | • Notify RHC when a MASH member home had made a complete application for certification or re-certification<br>• Provide RHC with all application | |

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| | **NOT A PROBLEM** | documents<br><br>• Receive RHC determination of eligibility for certification<br><br>• Issue certification where appropriate | |
| H. | **Issue Certification for sober homes determined to be in compliance with standards**<br>**NOT A PROBLEM; LARISSA HAS MADE SEROUS EFFORT TO RECONSTRUCT/UPDATE THESE FILES** | • Certify only sober homes who meet all of the certification standards and have passed a physical inspection<br><br>• Send paper certificate to sober home operator<br><br>• Update MASH website to add newly certified house | MASH itself reports that the majority of its sober home certification applications were lost and/or missing.<br><br>MASH certified sober homes that had not been inspected and put them on the MASH website.<br><br>MASH did not remove un-inspected homes from the MASH website immediately when notified that uncertified homes had been listed as certirifed. For example, MASH was notified by RHC that un-inspected homes were listed on the website as certified on 10/19/17 and again on 10/28; the homes were not removed until BSAS addressed this with MASH on 10/30/17.<br><br>MASH staff stated they did not have accurate certification dates but did not reach out to operators for this information.<br><br>Multiple sober homes report never having received paper certificates; MMS data indicates that few sober |

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| | | | homes were sent certificates. |
| I. | **Annually re-certify sober homes**<br>**THIS IS NO LONGER A PROBLEM; BUT DOES REQUIRE MONITORING** | • Inform certified sober homes about what they need to do to be re-certified and consequences of not re-certifying<br>• Inform certified sober homes of approaching certification expiration date and how to be re-certified, in writing<br>• Follow up via telephone to sober homes that have not yet reached out to MASH about re-certification<br>• Follow-up with any sober homes who have not re-certified within 15 days following certification expiration date<br>• De-certify sober homes who are more than 60 days past certification expiration date and remove from website | In Q1 of FY18, MASH reports 33 homes that were eligible for re-certification weren't re-certified. In Q2 of FY18, MASH report states 23 homes were overdue for re-certification and 14 of those are more than 30 days past due.<br><br>Re-certifications were not processed in a timely way, leading to a backlog of 60+ sober home re-certification inspection requests being submitted simultaneously.<br><br>BSAS has received complaints from sober home operators whose initial certification documents were lost by MASH; operators report negative interactions with MASH staff/representatives and being told that they would be de-certified when they tried to understand why documents needed to be re-submitted.<br><br>Despite BSAS recommendation to mail letters to sober homes that must re-submit documents, MASH ED stated "letters aren't necessary."<br><br>Sober homes report that MASH staff de-certified their home despite |

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| | | asserting that their paperwork was complete. (e.g., [redacted] [redacted]) |

*II. Serve as the primary unit of accountability for the system of certified sober homes in the Commonwealth of Massachusetts:*

| Responsibility | Detail | Notes |
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| **A. Communicate concerns regarding certified sober homes that may require a grievance investigation to the Sober Home Inspection vendor, as needed**<br><br>**NOT A PROBLEM** | • Relay information about grievances to RHC for investigation | |
| **B. Track and record all grievances/complaints submitted via telephone or website, record resolution and/or disposition for certified sober homes**<br><br>**THIS HAS BEEN ADDRESSES BUT I CHECK IN ON GRIEVNACE PROCESS AT EACH PROVIDER MEETING** | • Keep records of all sober home grievances, whether certified or uncertified<br><br>• Bring grievance investigation reports to MASH Ethics Committee for resolution<br><br>• Keep records of all grievance resolutions<br><br>• Inform sober home operators about grievance, resolution, and opportunities for improvement | Grievances have not been resolved in a timely way; in early January 2018, there were 5 grievances awaiting Ethics Committee decisions, three dating as far back as September and October 2017. This is concerning because data indicates only 23 grievances about certified homes were filed in the first half of FY18.<br>Then, on February 20 2018, the MASH ED reported that there were 12 open grievances with the oldest dating back to November 2017.<br><br>The MASH Ethics Committee has not been producing written decisions. MASH reports they are in the process of changing this.<br><br>MASH had not been providing written Ethics Committee grievance decisions or written |

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| | | | notifications of findings to sober home operators. MASH reports they are in the process of changing this. |
| C. | **De-certify sober homes that are determined to no longer be in compliance**<br><br>**NOT A PROBLEM EXCEPT WE HAVE ADDED RECORDING REASON FOR DECERTIFICATION** | • Inform operator of reason(s) for de-certification in writing<br><br>• Remove sober home from MASH website | |
| D. | **Notify BSAS of decision to de-certify a sober home and provide information regarding decision to de-certify.**<br><br>**THIS NOTIFICATION SHOULD ONLY COME OVER THE PHONE** | • Notify BSAS via telephone or email of decision to de-certify<br><br>• Provide BSAS with sober home name, location, and reason for de-certification | MASH has not always promptly notified BSAS of homes being de-certified or the reason for de-certification. |
| E. | **Propose annual revisions to the certification standards for BSAS's review and approval**<br><br>**TO BEGIN AFTER NEW STANDARDS ARE APPROVED** | • Develop internal process for reviewing standards<br><br>• Draft proposal with changes to existing certification standards for BSAS review, including justification and all foreseeable consequences of revision<br><br>• Collaborate with BSAS to implement approved changes, if any | MASH has not reported any process or proposal regarding certification standards. |
| F. | **Develop protocol for notifying MASH and RHC staff and certified homes of changes to standards**<br><br>**THIS HAS BEEN ADDRESSED** | • Draft protocol for notifying certified sober homes of changes to standards<br><br>• Develop strategy for informing stakeholders, updating website, etc | MASH has not reported any protocol for notification regarding changes to standards. |

*III. Develop and foster a statewide representation and coalition:*

| Responsibility | Detail | Notes |
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| **A. Participate in programs and information-sharing opportunities at state and national level**<br><br>**NOTED IN BEGINNING OF THIS DOCUMENT** | • NARR conference, as above<br>• NARR monthly call, as above<br>• New England Drug Court Conference<br>• Recovery Day<br>• Other events and conferences as appropriate | Infrequent participation in NARR monthly call, as above. |
| **B. Provide technical assistance and information to municipalities and local government bodies about sober housing certification, as requested** | • Inform municipalities and local government bodies about the certification process, standards, etc as requested | |
| **C. Remain informed of current research and best practices regarding sober housing at both the state and national level**<br><br>**NOT A PROBLEM** | • NARR conference, as above<br>• NARR monthly call, as above | Attended NARR conference. |
| **D. Organize, publicize and host quarterly information-sharing opportunities for certified sober home owner/operators in Massachusetts via telephone or webinar**<br><br>**THEY HAVE MEMBERSHIP CALLS** | • Create quarterly opportunities for sober home operators to learn from each other and for MASH to share info with and hear from operators | Did not hold any such event in Q1 of FY18. Q2 reported event was an office "open house" with no real TA for operators. |
| **E. Respond to external requests for information about sober homes and sober housing certification** | • Provide prompt and informative materials about sober homes and MASH's role<br>• This may include (but is not limited to) creating a something like a press packet with basic information | Unknown. |

*IV. Supervision and training:*

| Responsibility | Detail | Notes |
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| **A. Provide training and support for certified sober homes and sober homes seeking certification on best practices**<br><br>**ONGOING AND REQUIRES MONITORING** | • Offer training for both uncertified sober homes (sober housing 101) and "continuing education" type trainings for certified homes<br><br>• Offer ongoing trainings to focus on improving supportive living environment offered by sober homes, including topics like Medication Assisted Treatment, diversity/cultural competence, and Overdose Prevention<br><br>• Provide outreach to certified sober homes about opportunities to attend relevant outside trainings, including through AdCare<br><br>• Communicate regularly with certified homes to provide information about overdose prevention training opportunities and Narcan access | Thus far, despite significant BSAS support, MASH has been unable to organize and hold any type of continuing education training for certified homes.<br><br>Unclear how much outreach has been done to certified home staff re: non-MASH trainings. |
| **B. This includes at least three annual sessions of the two-day "Sober Housing 101" training required for certification**<br><br>**NOT A PROBLEM** | • Sober Housing 101 is for both sober home operators and house managers<br><br>• Conduct telephone and email outreach to sober homes with pending applications, homes whose house managers may not yet be trained, and other people with sober home operation roles who may be interested in the training<br><br>• Sober Housing 101 training to be led by experienced, NARR-trained trainers<br><br>• Sober Housing 101 training to contain material on fundamental best practices in operating a sober home, the certification and grievance processes, insurance coverage for laboratory urine testing, MAT, and overdose prevention | Trainers: BSAS had to organize a NARR-led training of trainers on MASH's behalf after MASH exhausted supply of trainers. MASH ED did not attend a previously scheduled webinar with BSAS and NARR staff re: Train the Trainers despite confirmation email from BSAS.<br><br>Sober Housing 101 training content requires intensive revisions for both content and clarity for each of the SH101 sessions (Feb 2017, June 2017, Oct 2017, Feb 2018). Content was at times unprofessional, |

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| | • Training content and handouts to be finalized by MASH and submitted to BSAS for approval well in advance of training date (at least 21 days) | inappropriate for the setting and/or negative about the treatment and recovery field, despite feedback.<br><br>Despite prompts, MASH has repeatedly not submitted training content (presentation and handouts) to BSAS in time for review before trainings. In October 2017, training content was not revised by the business day before training, forcing BSAS staff to make the required changes. MASH Board President then called and screamed at BSAS staff. In February 2018, handout packets were made without BSAS review. |
| C. **The Sober Housing 101 training shall take place in multiple different regions of the state**<br><br>**NOT A PROBLEM** | • The training locations may vary based on 1) quantity of uncertified houses in a particular region 2) geographic concentration of houses with pending certifications 3) need for house managers to be trained and/or other factors | |

### *V. Manage Fiscal and Administrative Operations of Certification Process:*

| Responsibility | Detail | Notes |
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| A. **Submit monthly invoices to BSAS**<br><br>**NOT A PROBLEM** | • Submit accurate invoices to BSAS once per month<br>• Manage reimbursement process and cash flow to ensure contractual duties continue to be performed | Invoices are habitually incorrect and require BSAS to point out errors and review repeated drafts of invoice each month.<br>MASH record-keeping contributes to the errors in the invoices (erroneous old invoices are used as the basis for |

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| | | new invoices).<br>MASH has had problems with cash flow and required emergency payment from BSAS to avoid laying off staff; MASH did not inform BSAS this was an issue until a week before layoffs were to take place. |

*VI. Maintain a website that provides information on all certified sober houses in the Commonwealth:*

| Responsibility | Detail | Notes |
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| **A. Work with the Massachusetts Substance Abuse Helpline to maintain an up-to-date list of certified sober homes**<br><br>**ELECTRONICALLY MANAGED BY HELPLINE** | • To be determined | Helpline staff reported that they repeatedly called (5-10x) and emailed (6x) MASH to discuss sober homes on the Helpline; MASH did not respond and did not follow up with Helpline staff who spoke with MASH staff. |
| **B. Maintain website that is accessible to the general public and contains at least an application form with instructions, certification standards, a grievance form and instructions, the Massachusetts sober home law, and an updated list of certified sober homes** | • Collaborate with BSAS to share important messages with sober homes via MASH site<br><br>• Maintain accurate, up-to-date list of certified sober homes<br><br>• Make changes to website in accordance with timeframes listed elsewhere in this document | Uncertified sober homes have appeared on the MASH site as certified and were not immediately removed. |
| **C. The certified sober home list will be searchable by location and contain full contact information for each sober home, including address, phone number, manager or operator name,** | | MASH staff have repeatedly removed the addresses of sober homes on the site (e.g., [redacted], [redacted], [redacted], despite Scope of Services requirements |

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| **and website**<br><br>**NOT A PROBLEM** | | and repeated discussions with BSAS that addresses needed to be on the site for transparency. |

### *VII. Reporting*

| Responsibility | Detail | Notes |
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| **A. Generate a weekly report to include at least the number of certified homes, the number of certified homes by region, the number of beds in those homes, the number of pending homes, the number of de-certified homes, and the number of inspections scheduled and completed. Send report to BSAS weekly.**<br><br>**NOT A PROBLEM?** | • Weekly report to be reviewed and accuracy confirmed in Friday morning conversation with RHC<br><br>• Weekly report to be emailed to BSAS Sober Housing Certification specialist<br><br>• Report email to BSAS should include explanation of any changes outside of expected increase in certifications | Weekly report has been recurrently incorrect and requires BSAS prompts and problem solving to revise.<br><br>In 11/2/17 meeting, BSAS requested that MASH send the report to RHC for validation before sending it to BSAS. BSAS then sent written memo specifying this on 11/6. Despite repeated BSAS clarification, MASH staff does not send the report to RHC for proofing.<br><br>RHC has begun to generate a parallel report to ensure that an accurate report is sent to BSAS each week. |
| **B. Meet regularly, at least monthly, with BSAS to provide updates on the progress and challenges of sober housing certification**<br><br>**NOT A PROBLEM** | • Bring updates, thoughtful analysis of current challenges and successes, suggestions for the future<br><br>• Willing and ready to collaborate with RHC as peers in the certification process | MASH representatives have displayed unprofessional (e.g., shouting) behavior in these meetings. |
| **C. Maintain records and report to BSAS on a quarterly basis on contract activities, including trainings, certifications, technical assistance,** | • Complete, accurate, timely reports encompassing all requested information<br><br>• 4th quarter report | MASH quarterly reports from Q1 and Q2 were both missing requested data points when submitted and required repeated BSAS prompting to complete. |

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| **grievances and outreach.**<br><br>**CURRENT REPORTING STATUS?** | should summarize all data by quarter and include yearly totals | Q2 report didn't make sense (only 5 new certifications and 10 de-certifications, but number of certified homes did not fall). |