Exhibit 10

BSAS corrective action plan issued to MASH

Source

Exhibits filed October 28, 2025 with the complaint in Vanderburgh House LLC v. Massachusetts Alliance for Sober Housing, Inc., et al., Suffolk Superior Court, C.A. No. 2584CV02978 (DPH records), pages 63 to 65.

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. Our redactions are solid black boxes. Nothing else has been altered; pages appear in their original order.

Date Filed 10/28/2025 1:07 PM
Superior Court - Suffolk
Docket Number

Massachusetts Department of Public Health
Bureau of Substance Abuse Services

Corrective Action Plan

Agency: Massachusetts Alliance for Sober Homes (MASH)
Program: Sober Home Certification Program
Contract # INTF2400JJ2506123347

Background

The Massachusetts Department of Public Health (MDPH), Bureau of Substance Abuse Services (BSAS) has contracted with MASH to certify sober homes as described in M.G.L. Chapter 17 section 18A – Voluntary training and accreditation program for operators of alcohol and drug-free housing. The purpose for the statewide certification program was to implement policy, procedures, systems, and best practices to support safe, and ethically managed sober housing for individuals who are seeking Alcohol and Drug Free Housing (ADH). Currently BSAS contracts with the Massachusetts Alliance for Sober Housing (MASH) to certify sober homes in Massachusetts (MA) utilizing the National Alliance for Recovery Housing (NARR) standards as the sole basis for certification. MASH is required to be an affiliate of NARR as part of this contract and trainings must be facilitated by NARR-trained trainers, for the purpose of providing ongoing training to current and potential certified sober homeowners, operators, and staff to support the health, safety, professionalism, training, and ethical management of sober homes across the Commonwealth.

As stated within the Scope of Services, responsibilities include training in compliance with state laws and the NARR level 2 standards, and recognized best practices, including MAT and all paths of recovery.

Formal Grievance

On January 19, 2023, BSAS received a formal complaint specific to a Sober Home 101 training that occurred January 9, 2023 – January 10, 2023, in Plymouth, MA Further the grievance claims that MASH's overall culture is one of resistance to MAT as a path to recovery and that those homeowners who are resistant to MAT are the same individuals who oversee MASH's grievance process. Specific concerns of the grievance include the following

- Use of stigmatizing language – referring to substance users as "a sick and twisted people" and "you will find common skill is lying and manipulating".
- Training provided potential owners with ways to circumvent fair housing laws and specifically MAT discrimination.
- Misinformation by another provider around medications such as Suboxone was left uncorrected.
- Certified sober homes are holding residents' medications; however, this is a peer-to-peer model, and one peer should not be allowed to hold another peer's medication.

Investigation and Findings

An investigation was conducted by MASH contract manager, Marci Yazwinski, and consisted of a zoom meeting with the complainant on January 24, 2023, discussions with the MASH executive director, history of incidents and complaints, participant survey responses, and review of how the 101 training was initially designed by NARR to meet the NARR train-the-trainer requirement.

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BSAS Review: Findings

Two areas were identified in the Scope of Service that are not being performed satisfactorily.

A. Train the Trainer and expansion of potential facilitators

- In 2021 BSAS requested the then executive director to contact NARR and be trained in presenting of the 101. This request was again made in August 2022 by BSAS to the current executive director.
- Currently all 101 and topic specific trainings are facilitated by the same homeowner and sober home house manager.
  Status - As of January 27, 2023, this task was not completed.

- In the Fall of 2020, Jennifer Halstrom and Marci Yazwinski met with then executive director Larissa Matzek to discuss this writer's concerns related to use of stigmatizing language and methods to work around the discrimination and fair housing laws.
  Status – Concerns were addressed, and changes were made for the next 101, including co-facilitation by AdCare trainer, Mark Muhammed. Stigmatizing language and "loopholes" to deny persons on MAT acceptance into a sober home continue intermittently, most recently in January 2023.

B. Grievance Procedure that is fair and equitable

- The grievance process as it currently stands includes MASH's Ethics Committee to review grievances and decide validity and future action. The Ethics Committee, per MASH by-laws, state the Ethics Committee be comprised of current Board Members and currently only one of the three members are also a board member.

- The current Ethics Committee has three members and all three are homeowners. The committee is absent of at least one person who does not view a grievance from a homeowner perspective.
  Status – Corrective Action Plan with specific recommendations and action items will be implemented immediately.

Conclusions and Recommendations

Conclusions

In addition to the two areas identified above, a third area that has received complaints and grievances over the past 2.5 years is the overall anti-MAT culture of MASH members.

Recommendations

- Implement and adhere to the Corrective Action Plan
- Add a service provider of MAT to the board of directors and ethics committee
- Consider having a MAT provider participate in the 101 trainings

Corrective Actions with Due Dates

- Provide increased education around MAT and fair housing laws to potential and current sober homeowners – **DUE 4/1/23**

- Use a BSAS-funded professional trainer (AdCare of IHR) to co-facilitate 101 trainings – **DUE 3/13/23**

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- Re-establish the NARR 101 and train-the-trainer model by having NARR teach at least three prospective trainers on updated material – **DUE 3/10/23**

- Address stigmatizing language used to describe persons with SUD. – **DUE 2/28/23**

In addition, 101's will be attended by the contract manager or other member of the BSAS Housing and Homeless unit.

Marci Yazwinski **02/01/2023**

Marci Yazwinski
Contract and Certification Specialist

Date