



CLIA (COW) CASE STUDY

BEHESO Consulting Services for Lotus Sober Living



By:
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Project Overview



Lotus Sober Living is a sober living program dedicated to providing a structured, supportive environment for individuals rebuilding their lives in sobriety.

As part of their commitment to resident accountability and compliance with state and federal standards, Lotus Sober Living sought to implement Point-of-Care (POC) testing through CLIA certification.



Objectives



CMS Application

Submit CMS CLIA Certificate of Waiver (COW) Application for Lotus Sober Living correctly and promptly



Policy & Procedures

Update Drug Testing Policy and Procedure to reflect the acquiring of CLIA COW and to include language specific to the tests used.



Staff Training

Create personalized trainings for Lotus Sober Living Staff relevant to the CLIA Waived UA tests utilized by the program.



Residency Agreements

Update residency agreement to include information accurate to CLIA COW.

Deliverables

Application Management

- Completed and submitted the CMS application for a CLIA Certificate of Waiver on behalf of Lotus Sober Living.
- Ensured all documentation was accurate and compliant with regulatory requirements.

Personalized Training & Curriculum Development

- Designed a CLIA-specific training curriculum tailored to Lotus Sober Living’s needs.
- Developed clear, step-by-step instructions for proper UA testing and breathalyzer administration.
- Delivered in-person training sessions with staff to ensure knowledge retention and compliance.

Competency Checks & Certification

- Conducted live demonstrations and assessments to verify staff competency.
- Issued Certificates of Completion to all staff who successfully completed training.

Policy & Procedure Enhancement

- Updated Lotus Sober Living’s Policy & Procedures Manual to align with CLIA testing standards.
- Revised Residency Agreements to include updated language around testing protocols and resident accountability.

Results



Successful Application

CMS CLIA Certificate of Waiver (COW) Application successfully submitted free from errors



Certificates of Completion Issued

All staff received personalized training, in-person, and passed competency checks for certification.



Policy & Procedure Updates

Updated P&P Manual for Lotus Sober Living to be in compliance with CLIA COW



Passed Compliance Audit

BEHESO performed a compliance audit post-services and verified Lotus Sober Living meets all requirements.

Client Impact

Lotus Sober Living is now fully equipped to administer UA and breathalyzer testing in-house, providing residents with a consistent and accountable recovery environment. With BEHESO's continued support, they maintain compliance while enhancing the quality of care and safety for their community.



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Location

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