



## **SALISH BHO**

### **ADMINISTRATION POLICIES AND PROCEDURES**

**Policy Name:** COMPREHENSIVE INFORMATION PLAN  
FOR SBHO DELIVERY SYSTEM AND  
SERVICES

**Policy Number:** 2.06

**Reference:** State Contract, WAC 388-865-0246, -0252;  
42 CFR 438.100

**Effective Date:** 9/2005

**Revision Date(s):** 2/2013; 3/2016; 7/2017; 6/2018

**Reviewed Date:** 3/2016; 7/2017; 6/2018

**Approved by:** SBHO Executive Board

#### **CROSS REFERENCES**

- Policy: General Information Requirements
- SBHO Member Handbook

#### **PURPOSE**

It is the policy of the Salish BHO (SBHO) to plan and implement actions which ensure to the extent possible, individuals eligible for behavioral health services are notified of the existence, availability, and services within the SBHO. In part, the SBHO and/or the network providers or subcontractors will advise Medicaid and non-Medicaid individuals eligible for behavioral health services about their rights, promote access to individuals who are of limited proficiency in English, encourage stigma reduction activities and support recovery and resiliency.

#### **INFORMATION PLAN**

The SBHO is committed to developing and utilizing a comprehensive information plan that includes benefit information, services available, how to access services, enrollee rights and responsibilities, and accommodations available for diverse populations (including other languages than English) within the region. The SBHO and/or the providers will incorporate use of media, stigma reduction activities, and plan for ongoing evaluation of the strategic information plan. The information plan includes the following areas that are addressed on an ongoing basis:

### **State Benefits Booklet**

1. The SBHO will provide the State the information necessary to update the State Benefits Booklet for Medicaid enrollees.
2. Upon request, the SBHO and the network providers will inform Medicaid enrollees how they can access or obtain a copy of the State Benefits Booklet.
  - The State Benefits Booklet (electronic version) is also listed on the SBHO website.
3. The booklet serves as a mechanism to inform enrollees of their benefits, rights, and responsibilities.

### **SBHO Service Description**

1. The SBHO has designed a member handbook. It contains the following information:
  - A brief overview of the SBHO values, function, and service delivery model.
  - Core network provider names, addresses, and phone numbers.
  - A description of Medicaid/non-Medicaid covered services and how to access them. Recipient's responsibility when attempting to access out of the area services, including a statement about what constitutes out of the area services.
  - A brief description of Ombuds and NAMI advocacy resources.
  - SBHO office contact information.
  - How to file a network agency and SBHO grievance, and DSHS fair hearing.
  - How to access the handbook in alternative/translated formats and cultural service delivery considerations.
2. The SBHO website makes general information easily accessible. The current SBHO mission, brochure, handbook, and manual are listed.
  - The SBHO website is located at:  
<https://www.kitsapgov.com/hs/Pages/SBHO-LANDING-HOME.aspx>

## **Individual Notification of Rights, Responsibilities, and Grievance**

### Distribution of Information

The SBHO and/or the providers provide information to individuals eligible for behavioral health services by distributing informational material at a wide variety of locations accessed on a regular basis by individuals who may qualify for services. Providers also have the information available to handout prior and during a behavioral health intake or substance use disorder assessment. Provider brochures will be located in various publicly accessible and conspicuous office locations, as will brochures describing the function of the Ombuds program. SBHO posts client rights on public website. Providers provide client rights information to each person applying for services.

The SBHO informational material as described above includes:

1. Information advising individuals eligible for behavioral health services of their rights and responsibilities. When contractually required, the network providers and subcontractors will have the rights conspicuously posted in lobby areas in the State designated seven languages.
2. Information advising individuals eligible for behavioral health services of their right to file grievance procedures with Ombuds assistance, the right to express dissatisfaction with services at the provider and SBHO level, as well as the State Fair Hearing processes. Information will inform individuals that Ombuds support is available when pursuing grievances and fair hearings. The Ombuds toll free number will be listed.

## **Access to Behavioral Health Services**

### Telephone Directory

The SBHO, the network providers and subcontractors, including the Ombuds, will maintain telephone number listings and identification of service, in all major area telephone directories, including a toll-free number and crisis line access numbers.

### Internet Website Directory

The SBHO maintains a website that provides links to all our core network provider homepages.

The SBHO website also provides direct links to the SBHO Member Handbook, State Benefits Booklet, SBHO Grievance brochure, and Advance Directive information.

### Area Resource Directories

The SBHO, the network providers and subcontractors, including the Ombuds, will refer individuals to the local 211 for listing of services and telephone numbers for commonly used services in the local area.

## **Services for Diverse Populations**

The SBHO network providers and subcontractors are required to provide interpreter services for enrollees with a primary language other than English for all interactions between the individual and the network provider/subcontractor, including, but not limited to: customer service, all appointments for any covered service, crisis services, and all steps necessary to file a grievance or appeal.

### State Targeted Diverse Populations

The State Benefits booklet is available on the State website and can be downloaded in the targeted languages.

1. The SBHO will provide translated information on access to care, Medicaid and non-Medicaid covered services, member contact information for provider network, Ombuds program and description and contact information, SBHO office contact information, individual rights, and how to access the material in alternative formats (such as Braille and large print).
2. The State has targeted the following seven languages for rights to be posted and all written SBHO informational material (as listed above) to be translated into:
  - Cambodian
  - Chinese
  - Korean
  - Laotian
  - Russian
  - Spanish
  - Vietnamese
3. Information on how to access written material in an alternative language must be provided prior to conducting an intake evaluation.

### SBHO Additional Targeted Diverse Populations

The SBHO distributes performance reports to each provider and the Quality Improvement Committee (QUIC) quarterly. The QUIC reports illustrate the percentage of diverse populations served and compares it to current census information within each provider catchment area. The reports are used to calculate other diverse population than recognized by the State within our catchment area and evaluate if the diverse populations within the area are underserved. When an underserved population is identified, the SBHO and the providers develop strategies to improve access for that group.

## Network Provider Service Descriptions

### Brochures

The SBHO requires the network providers, subcontractors, and Ombuds to:

1. Publish their own informational brochure listing address, phone, and services specific to their individual agency.
2. Publish brochures in English. The brochures will be published in Spanish and Tagalog in areas where there is a population of 500 or greater (per census information), whose primary language is Spanish or Tagalog located within the provider's catchment area. As additional primary languages are identified for a census population of 500 or greater, the brochures will be published and distributed in those areas.
3. Distribute the brochures as described above.

### Notices

1. The SBHO requires the providers, subcontractors, and Ombuds to:
  - Make bulletin boards and other adequate space available for posting information, legal notices, hours of operation, services and service locations, benefit opportunities, grievance procedures, interpretive or other special population rights, notifications, and other contractual material that may be useful for the individual population and general public.
  - Post notices, rights, advocacy groups and grievance information prominently.
2. The SBHO provides Notice of Adverse Benefit Determination (NOABD) written notification to Medicaid enrollees for intended authorization decisions that meet the definition for an action. All NOABD material is accompanied with information about the SBHO Appeal process.
3. The SBHO provides written notification to individuals stating the disposition of a grievance and resolution of an appeal filed with the SBHO.
4. The SBHO provides written notification to non-Medicaid individuals seeking outpatient services through the SBHO and *do not* meet entrance criteria.

### Written Materials

The SBHO network providers, subcontractors, and Ombuds will give each individual written material available in English or other alternate languages, as defined above in the State targeted and SBHO additional targeted diverse populations, which include:

1. A statement of services provided by the agency or organization, and how to access.
2. Individual rights and responsibilities.

3. Agency/SBHO grievance procedures, including how to file concerns at various levels (such as through the provider, Ombuds, SBHO, and an administrative hearing through the State).
4. Ombuds Services.
5. HIPPA Privacy Statements.
6. Signs of mental illness.
7. How to request information in another format/language.

### Media

The SBHO and/or the provider network will utilize various forms of the media to provide SBHO behavioral health service information:

1. Inform the public about services available for individuals with mental illness, including information about statewide access criteria.
2. Notify the public regarding upcoming events, speakers, workshops, conferences, support groups and the meetings of the local and National Alliance for the Mentally Ill (NAMI).
3. Reduce stigma by providing informational articles/videos, regarding behavioral illness, recovery, and services.
4. Information may also be distributed through other postings or programs including through radio spots, speaker's bureaus accessing service clubs, newspapers, newsletters, magazines, posters, billboards, flyers, internet website postings and any other means deemed useful.

### **Ancillary and Allied Cross System Information Sharing**

The SBHO, network providers, and subcontractors are committed to building partnerships with social service providers across the region to share information and coordinate services to meet the needs of individuals with behavioral health issues.

1. The SBHO, network providers, and subcontractors will encourage allied providers to distribute our informational materials that publicize behavioral health services, rights, educational/anti-stigma campaigns and accompanying information.
2. The SBHO is committed to informing the allied systems of services, upcoming events, workshops, and trainings, and resources in the community to support the treatment of individuals with behavioral health issues.
3. The SBHO is committed to establishing and maintaining working agreements with allied systems. Reference the SBHO Cross System Working Agreements.

## **SBHO Information Plan Evaluation**

The SBHO will review and evaluate this plan on an annual basis to assess the following:

1. Using the provider quarterly performance reports, to determine if information is reaching the designated populations and locations.
2. Have other organizations or services been developed that we need to target with information on behavioral health issues?
3. Using 2010 or more current census data, determine if the information needs to be translated in any other language to meet the need of any specific population in the area.

## **SBHO PLAN MONITORING**

The SBHO Comprehensive Information Plan is mandated by federal and state statute and contract.

1. This plan will be reviewed, and updated, at least annually.
2. This plan will be monitored through use of the SBHO:
  - Monthly Ombuds Activity Reports
  - Annual SBHO Provider and Subcontractor Administrative Review
  - Biennial Provider Quality Review Team On-site Review
  - Grievance Tracking Reports
2. Any area of the plan not meeting plan expectations, the SBHO shall implement a Corrective Action Plan. Reference SBHO Corrective Action Plan Policy.