



North Sound Behavioral Health Organization, LLC

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North Sound BHO Contract Memorandum 2017-007

Date: May 1, 2017

To: Tom Sebastian, Compass Health and Compass Whatcom
Donna Konicki, Bridgeways
Michael Watson, Lake Whatcom RTC
Will Rice, Catholic Community Services Northwest
Claudia D'Allegrì, Sea Mar
Cammy Hart-Anderson, Snohomish County MH/CD/Vets Division Manager
Phil Smith, Volunteers of America
Randy Polidan, Unity Care NW
Sue Closser, Sunrise Services
Robert Sullivan, Pioneer Human Services
Beratta Gomillion, Center for Human Services
Corky Hundahl, Phoenix Recovery Services
Julie Lord, Pioneer Human Services
Linda Grant, Evergreen Recovery Services
Marli Bricker, Therapeutic Health Services

From: Joe Valentine

Subject: Blank Template for Narrative Summary Report and Grievance Categories and Definitions

Greetings BHA Providers:

A blank template for the "BHA Narrative Summary Report" is provided for reporting convenience. The Microsoft Word version will be attached to the email as a separate document for convenience of populating at your site. A pdf version will also be attached to this NM.

The revised "Grievance Categories and Definitions" document is also attached below.

Policy 1002.00 – Grievance

Policy 1002.00 has not been changed; therefore, is not included.

The NM has attachments included below for your convenience.

Please ensure all appropriate staff is notified of these documents.

These documents became effective April 1, 2017.

cc: Cindy Ferraro, Bridgeways
Becky Olson-Hernandez, Compass Health
Kay Burbidge, Lake Whatcom RTC
Pat Morris, Volunteers of America
Katherine Scott, Sea Mar
Richard Sprague, Unity Care NW
Danae Bergman, Center for Human Services
Jackie Henderson, Island County Coordinator
Barbara LaBrash, San Juan County Coordinator
Rebecca Clark, Mental Health Program
Coordinator Skagit County

Anji Jorstad, Snohomish County Coordinator
Anne Deacon, Whatcom County Coordinator
Marsh Kellegrew, Evergreen Recovery Services
Robert Sullivan, Pioneer Human Services
Perry Mowery, Whatcom County
Contract File

Narrative Summary – Do NOT Include PHI

North Sound Behavioral Health Organization (North Sound BHO) Concern/Complaint*, Grievance, Notices of Action, Appeal, and Fair Hearing Reporting <i>(*There are NO Complaints at the BHO level, Complaints are at the DBHR Level. However, BHAs may have concerns/complaints for others without Grievance Rights)</i>	
3 Month Narrative Report	
Date:	
BHA-Agency or Reporting Source:	
BHA-Agency Contact:	Phone #:
BHA 1-800 Phone Number:	
3 Month Report Period: <i>(Insert Month to Month and Year Here)</i>	
1. Summary and analysis of the implications of the data	
(Please summarize and analyze all data including concerns/complaints*, grievances, notices of action, and fair hearings for the 3-month period of <i>(Insert Month to Month and Year Here)</i> . (Please include all complaints by others without grievance rights and grievance data regardless of Ombuds involvement. Please include analysis of complaints* from others even though this information is not included in the CIS Web Portal system for Grievance System reporting.)	
2. Identification of system implications	
(Please note any system implications).	
3. Identification of areas for further study, analysis, and review or quality improvement	
(Please note any areas identified for further study, analysis and review or quality improvement).	
4. Was information related to concerns/complaints*, grievances, notices of action, appeals or fair hearings used on your quality management plan? If YES, please summarize. <i>(Providers, designees, and counties)</i>.	
5. Measures that may be taken to address quality improvement or undesirable patterns <i>(all reporters)</i>.	
(Please outline any measures you have identified to address identified quality improvements).	

North Sound BHO - Grievance Report Categories

Important Note: Medicaid enrollees have rights to receive a Notice of Action (Notice or NOA) and to file an appeal for some service issues. It is important to ensure Medicaid enrollees receive a Notice of Action in these cases and that they are directed to file appeals, not grievances. A non-Medicaid individual, however, may file a grievance over any BHO decision or service issue-these are reported on the State-only grievance form.

CATEGORIES

Access:

- Concerns about ability to receive intake appointments, timeliness of referrals and appointments, or other issues with the intake or referral process (within available resources per North Sound BHO Policy (formerly NSMHA) 1574 for state funded individuals).
- Inability to access services due to language barriers.
- Denials, terminations, suspensions or reductions of services for Non-Medicaid clients.

(A denial or termination of services for a Medicaid client is not a grievance, it is an Action and the BHO must provide a Notice of Action. Notices of Actions may then be appealed.)

Dignity and Respect: Issues regarding courtesy, tone of voice, language, or other treatment seen as disrespectful.

Quality/Appropriateness: Issues regarding poor quality treatment or treatment errors.

Phone Calls Not Returned: May involve calls made to multiple clinicians or supervisors.

Service Intensity, Not available or Coordination of Services: Generally issues in this category would be Actions (disagreement with treatment plan), except for Non-Medicaid clients. May include problems with coordination between providers, peer support services, health care providers, or others involved in the treatment plan.

Participation in Treatment: A grievance might be an individual's voice and viewpoint is not being included in treatment planning, or a parent is dissatisfied with their level of participation or requested other supports are not involved in treatment planning.

Physicians, ARNPs, and Medications: Problems with communication or scheduling issues or concerns involving medication. A person may also request a 2nd opinion.

Financial and Administrative Services: Generally deals with payees employed by the Community Mental Health Agency (CMHA) and funded by the BHO, or incorrect paperwork or billing issues. An individual may not file a grievance regarding eligibility for SSI or regarding private payees.

North Sound BHO - Grievance Report Categories

Residential: Any issue with BHO-related services. These should primarily concern mental health treatment activities, noise, or privacy. An individual may, however, file a grievance with other issues including food, health or safety. These issues should be investigated by the BHO as well as be referred to the Department of Health.

Housing: Issues related to effectiveness in assisting clients to obtain and maintain housing. This does not include Landlord/Tenant issues.

Transportation: Issues relating to transportation that are BHO-related.

Emergency Services: These grievances would always involve an additional category, to clarify the nature of the problem. Grievances generally relate to services the BHO provides, including crisis lines, crisis services, Evaluation & Treatment (E&T) centers, hospital alternative programs, or detentions.

A person may file a BHO grievance about a Designated Mental Health Professional (DMHP) or detention services. The result of the detention process is under the jurisdiction of a Superior Court and is not grievable. BHOs should note any trends in detentions. Examples of grievances might be dignity and respect issues, privacy, lack of timeliness, or lack of due process.

Violation of Confidentiality: Any information regarding a client that is inappropriately disclosed, including name, diagnosis, treatment or providers.

Other Rights Violations: Violation of any consumer rights that are **not** covered in other categories (such as dignity and respect and confidentiality). These could include issues involving interpreters, cultural differences, or Advance Directives.

Other: A rarely used category for hard to categorize issues.

RESOLUTION TYPES

Information or Referral: A grievance is resolved mutually through providing additional information or referral to other services. An example would be a person believing their rights had been violated but was satisfied by being directed to Washington Administrative Code (WAC).

Conciliation/Mediation: A resolution agreed to mutually.

Not Pursued: Client requested to end grievance, discontinued participation in grievance process, moved away, was hospitalized, died, etc. A letter of resolution should be sent whenever possible, using discretion and sensitivity.

Other: A BHO resolution decision without mutual agreement. Other hard to categorize resolutions.

(A Fair Hearing is not a resolution. The grievance resolution letter is sent with its explanation that is the resolution. The filing of a Fair Hearing is a separate decision.)