



SALISH BEHAVIORAL HEALTH
ADMINISTRATIVE SERVICES ORGANIZATION
EXECUTIVE BOARD
MEETING

Providing Behavioral Health Services in
Clallam, Jefferson and Kitsap Counties

DATE: Friday, February 16, 2024
TIME: 9:00 AM – 11:00 AM
LOCATION: Cedar Room, 7 Cedars Hotel
270756 Hwy 101, Sequim, WA 98382

LINK TO JOIN BY COMPUTER OR PHONE APP:

*****Please use this link to download ZOOM to your computer or phone:
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Meeting ID: 892 8318 5750

USE PHONE NUMBER and MEETING ID TO JOIN BY PHONE:

Dial by your location: 1-253-215-8782

Meeting ID: 892 8318 5750

A G E N D A

[Salish Behavioral Health Administrative Services Organization – Executive Board](#)

1. Call To Order
2. Announcements/Introductions
3. Opportunity to Address the Board on Agenda Topics (limited to 3 minutes each)
4. Approval of Agenda
5. Approval of SBH-ASO Executive Board Minutes for December 8, 2023 (Attachment 5)
6. Action Items
 - a. Approval of Kitsap County Opioid Abatement Plan
 - b. Review and Approval of the 2023/2024 SBH-ASO Risk Assessment (Attachment 6.b.1 and 6.b.2)
7. Informational Items
 - a. Legislative Update
 - b. R.E.A.L. Program Overview
 - c. Advisory Board Update
8. Opportunity for Public Comment (limited to 3 minutes each)
9. Adjournment

ACRONYMS

ACH	Accountable Community of Health
ASAM	Criteria used to determine substance use disorder treatment
BHAB	Behavioral Health Advisory Board
BH-ASO	Behavioral Health Administrative Services Organization
CAP	Corrective Action Plan
CMS	Center for Medicaid & Medicare Services (federal)
COVID-19	Coronavirus Disease 2019
CPC	Certified Peer Counselor
CRIS	Crisis Response Improvement Strategy
DBHR	Division of Behavioral Health & Recovery
DCFS	Division of Child & Family Services
DCR	Designated Crisis Responder
DDA	Developmental Disabilities Administration
DSHS	Department of Social and Health Services
E&T	Evaluation and Treatment Center (i.e., AUI, YIU)
EBP	Evidence Based Practice
FIMC	Full Integration of Medicaid Services
FYSVRT	Family, Youth and System Partner Round Table
HARPS	Housing and Recovery through Peer Services
HCA	Health Care Authority
HCS	Home and Community Services
HIPAA	Health Insurance Portability & Accountability Act
HRSA	Health and Rehabilitation Services Administration
IMD	Institutes for the Mentally Diseased
IS	Information Services
ITA	Involuntary Treatment Act
MAT	Medical Assisted Treatment
MCO	Managed Care Organization
MHBG	Mental Health Block Grant
MOU	Memorandum of Understanding
OCH	Olympic Community of Health
OPT	Opiate Treatment Program
OST	Opiate Substitution Treatment
PACT	Program of Assertive Community Treatment
PATH	Programs to Aid in the Transition from Homelessness
PIHP	Prepaid Inpatient Health Plans
PIP	Performance Improvement Project
P&P	Policies and Procedures
QUIC	Quality Improvement Committee
RCW	Revised Code Washington
R.E.A.L.	Recovery, Empowerment, Advocacy, Linkage
RFP, RFQ	Requests for Proposal, Requests for Qualifications
SABG	Substance Abuse Block Grant
SAPT	Substance Abuse Prevention Treatment
SBH-ASO	Salish Behavioral Health Administrative Services Organization
SUD	Substance Use Disorder
TAM	Technical Assistance Monitoring
UM	Utilization Management
VOA	Volunteers of America
WAC	Washington Administrative Code
WM	Withdrawal Management
WSH	Western State Hospital, Tacoma

[Full listing of definitions and acronyms](#)



Salish Behavioral Health
Administrative Services Organization

SALISH BEHAVIORAL HEALTH ADMINISTRATIVE SERVICES ORGANIZATION

EXECUTIVE BOARD MEETING

Providing Behavioral Health Services in
Clallam, Jefferson and Kitsap Counties

Friday, February 16, 2024

Action Items

A. APPROVAL OF KITSAP COUNTY OPIOID ABATEMENT PLAN

Recommendations were made to the Kitsap County Board of Commissioners on Monday, February 5, 2024. This meeting included staff from Kitsap County Human Services, Kitsap County Public Health, and Kitsap County Prevention programs.

Kitsap County Opiate Abatement Funding includes partnership for funding from Kitsap County, City of Bainbridge Island, City of Bremerton, and City of Port Orchard. Funding recommendations include:

- Kitsap Public Health funding to provide a staff to support community education campaign, facilitation of community table to bring together key partners to identify needed future programming, and data collection support.
- Kitsap County Human Services Prevention Program funding to provide staff to engage in evidence-based intervention in schools and community focused on youth and facilitation of positive community events for youth throughout Kitsap County
- Funding to support the purchase of naloxone for community-wide distribution.

Staff seeks the Board's approval of Kitsap County's plan.

B. REVIEW AND APPROVAL OF THE 2023/2024 SBH-ASO RISK ASSESSMENT

In accordance with 45 CFR §164.308 the SBH-ASO is required to maintain, review, and update a Risk Assessment. This document provides a process by which the SBH-ASO continually monitors its operations to identify areas of potential risk and opportunities for mitigation. In order to ensure this document is comprehensive, SBH-ASO Staff worked collaboratively to identify areas of risk in all avenues of its business operations. For the 2023/2024 Risk Assessment, the top 3 identified risks include:

- Process for procurement and/or administration of new program development while managing staff bandwidth, agency bandwidth, and challenges with information flow.
- Frequency of change to HCA Behavioral Health Supplemental Data Guide (BHDG) creates risk of incorrect and untimely data submissions. Challenges in programmatic changes occurring prior to adequate stakeholder involvement.

- Changes to Regional Crisis System as a result of State level (i.e., judicial, legislative, regulatory) changes could inhibit community response to behavioral health crises, HB1688 planning and implementation, and the increase in complexity of service delivery with lack of clarity around organizational responsibilities.

This document is attached for review, comment, and approval by the Executive Board.

Informational Items

A. LEGISLATIVE UPDATE

Washington State Behavioral Health Organizations have been following:

2SSB 6251 - Behavioral health administrative services organizations shall use their authorities under RCW 71.24.045 to establish coordination within the behavioral health crisis response system in each regional service area including, but not limited to, establishing comprehensive protocols for dispatching mobile rapid response crisis teams and community-based crisis teams.

SB 6295 - Requires the Department of Social and Health Services to provide supplemental enhanced resources to a person discharging from involuntary commitment at a psychiatric facility after dismissal of a criminal case based on incompetency to stand trial, in collaboration with other entities. Requires behavioral health administrative services organizations (BH-ASOs) to provide wraparound services for persons in the community with a history of involvement with the forensic psychiatric system if the BH-ASO is not able to refer the person to a specialty service.

HB 2088 - Provides covered entities and personnel with immunity from civil liability for negligent acts and omissions while providing: (1) specified crisis care services under clinical supervision to persons experiencing a behavioral health crisis; or (2) transportation of patients to specified services.

SSB 2245 - Requires the University of Washington (UW) School of Social Work to establish a co-response training academy pilot program and a peer support program for co-responders. Requires the UW School of Social Work to explore the development of credentialing opportunities for co-responders. Requires the UW School of Social Work to provide an annual assessment to the Governor and the Legislature regarding the co-response workforce.

SSB 2247 - Changes licensing requirements, practice settings, and reimbursement requirements for various behavioral health professions.

HB 2469 (sec 8) - Revises provisions of the Involuntary Treatment Act to: require courts to consult the Judicial Information System before entering relief, expand eligible petitioners under Joel's Law, address determinations regarding whether a person will seek voluntary treatment, and address required notices of loss of firearm rights. Requires the Health Care Authority (HCA) to contract with

organizations to convene focus groups to make recommendations on improving experiences and outcomes for civil commitment patients and develop a proposal for a statewide network of secure, trauma-informed transport for civil commitment patients. Requires the HCA to contract with an association representing designated crisis responders to develop a training program for licensed social workers who practice in an emergency department with responsibilities related to involuntary civil commitments.

B. R.E.A.L. PROGRAM OVERVIEW

The Recovery Navigator Program

In 2021, SB5476, which is a legislative response to State v. Blake decision, required BH-ASOs to establish a Regional Recovery Navigator Program. This program was intended to provide referral and response for law enforcement jurisdictions to divert from legal action for individuals presenting with substance use or co-occurring needs.

In the Salish Region the program was name R.E.A.L. (Recovery. Empowerment. Advocacy. Linkage). Salish currently has 5 teams across the 3 Counties. Callam County teams are provided under contract with Peninsula Behavioral Health and Reflections Counseling Services Group, Discovery Behavioral Health is the provider in Jefferson County, and Kitsap County is served by Agape Unlimited and West Sound Treatment Center. Services are provided under the core principles of the LEAD model (Let Everyone Advance with Dignity). These team are intended to be staffed by individuals with lived experience.

Priority Populations for this program include individuals with substance use or co-occurring needs, frequent contact with law enforcement or first responders, and individuals who have had challenges accessing services under the traditional service model. Referrals are accepted from any source with priority given to those referred directly by law enforcement.

R.E.A.L. Teams in Salish started provided services in December 2021. We are now entering year 3 of providing support to in individuals in need.

C. ADVISORY BOARD UPDATE

SBHASO Advisory Board Chair, Jon Stroup, will provide an update on Advisory Board activities.

**MINUTES OF THE
SALISH BEHAVIORAL HEALTH ADMINISTRATIVE SERVICES ORGANIZATION
EXECUTIVE BOARD**

Friday, December 8, 2023

9:00 a.m. - 11:00 a.m.

Hybrid Meeting

**Jamestown S’Klallam Red Cedar Hall Alderwood Room
1033 Old Blyn Hwy, Sequim, WA 98382**

CALL TO ORDER – Commissioner Mark Ozias, Chair, called the meeting to order at 9:03 a.m.

INTRODUCTIONS – Self introductions were conducted.

ANNOUNCEMENTS – Doug Washburn, Director of Kitsap County Human Services, announced Jolene Kron as the new Salish BHASO Administrator.

OPPORTUNITY FOR PUBLIC TO ADDRESS THE BOARD ON AGENDA TOPICS – None.

APPROVAL of AGENDA –

Additional line items omitted from the revenue and expenditure budgets in the original agenda will be reviewed during the meeting.

MOTION: Teresa Lehman moved to approve the agenda as presented. Commissioner Brotherton seconded the motion. Motion carried unanimously.

APPROVAL of MINUTES –

MOTION: Commissioner Brotherton moved to approve the meeting notes as submitted for the September 15, 2023 meeting. Teresa Lehman seconded the motion. Motion carried unanimously.

ACTION ITEMS

➤ **EXTENSION OF ADVISORY BOARD MEMBER TERM**

Sandy Goodwick represents Clallam County. Sandy has been a member of the SBHASO Advisory Board since the inception of the SBHASO in 2020. She also served as an Advisory Board member for the Salish BHO previously. Her current term expires December 31, 2023. Seeking approval to extend her term for 3 years from January 1, 2024 - December 31, 2026.

MOTION: Commissioner Brotherton moved to approve the extension of Advisory Board member Sandy Goodwick’s term for 3 years from January 1, 2024 – December 31, 2026. Teresa Lehman seconded the motion. Motion carried unanimously.

➤ **APPROVAL OF MEDICAID BUDGET FOR 2024**

A summary of anticipated calendar year 2024 Medicaid Revenue and Expenditures is attached for the Board’s review. Staff will review these documents in detail.

MOTION: Commissioner Brotherton moved to approve the 2024 Medicaid Budget as presented. Theresa Lehman seconded the motion. Motion carried unanimously.

Staff provided a detailed review of Medicaid Revenue and Expenditures for 2024.

Medicaid revenue comes directly from the five Managed Care Organizations (MCOs): Amerigroup, Community Health Plan of Washington, Coordinated Care Washington, Molina Healthcare, and United Healthcare. Revenue directly funds Crisis Services in the Salish region.

Staff consistently monitor Medicaid revenues and Enrollee data to determine whether any adjustments to funding are needed. Several of the MCOs require reconciliation, wherein any unencumbered funds are returned.

SBHASO utilizes General Fund State (GFS) to cover a portion of Crisis Services for uninsured individuals.

SBHASO is in the process of renegotiation with several MCOs. Contracts have lapsed during this process, however, MCOs continue to provide payments as usual.

➤ **APPROVAL OF NON-MEDICAID BUDGET FOR 2024**

A summary of anticipated calendar year 2024 non-Medicaid Revenue and Expenditures is attached for the Board's review. Staff will review these documents in detail.

MOTION: Commissioner Brotherton moved to approve the 2024 non-Medicaid budget as presented. Theresa Lehman seconded the motion. Motion carried unanimously.

Staff provided a detailed review of Non-Medicaid Revenue and Expenditures for 2024, noting specifically new programs and changes in funding from the prior year.

Revenue is comprised of four contracts, including a housing contract with the Department of Commerce, two housing contracts with HCA, and the main HCA contract.

Non-Medicaid revenue allocations reviewed are final and are not anticipated to change prior to mid-year amendment. The next budget review is scheduled for May 2024.

GFS is the most flexible funding source. It is the primary fund for the Salish region's Crisis System. Non-Medicaid funds are braided together to meet the needs of a given program.

SBHASO distributes funds to each county based on the percentage of Medicaid enrollees and anticipated non-Medicaid population.

Question about Board involvement in communicating regional-specific legislative priorities to the State. Historically the Board has not been directly involved, however, the ASO does meet with Brad Banks weekly. Plan for the Board to connect with Staff and Brad Banks in early 2024 to discuss regional needs and future legislative advocacy.

Inquiry regarding challenges with braiding funds to meet community needs, and whether expenditure allocations presented are meeting the current need. Plan for more robust conversation around this topic at a future Board meeting.

Discussion around presenting descriptive programmatic information and data at future Board meetings. SBHASO Program Staff will be presenting on their respective program at Board meetings throughout 2024. Additionally, an outline of ongoing Board educational opportunities is in development; any areas of particular interest can be shared with the Chair.

INFORMATIONAL ITEMS

➤ **LEADERSHIP TRANSITION**

Stephanie Lewis gave her resignation effective December 1, 2023. She was a tremendous asset to the organization during a significant time of change. She will be missed.

Jolene Kron has been appointed as the new Administrator for Salish BHASO. We will be looking at reorganization over the next several months to enhance our current resources and support the future of the Salish BHASO.

SBHASO is in the process of contracting with a new Medical Director, Dr. Timothy Justice.

➤ **ANNUAL CODE OF CONDUCT REVIEW**

Each member of the Executive Board is asked to review the current code of conduct and sign the annual attestation. Please see the attached documents.

Introduction of Ileea Clauson, Utilization Manager and Privacy and Compliance Officer.

➤ **NALOXONE UPDATE**

Salish BHASO has been committed to providing support to individuals with opiate disorders. As an organization, we have been distributing naloxone to our communities over the past 4 years. We have distributed over 1000 naloxone kits so far in 2023. This has been achieved through a partnership with Washington Department of Health and funding from our Health Care Authority Contract. We recently received ten naloxone cabinets to support ease of distribution across the three counties. Staff is currently in the process of identifying interested parties and determining the best location to install these cabinets.

Each naloxone cabinet holds 50 kits.

Interested parties include Quillayute Tribe, Brinnon Fire, Kitsap Transit, and Hoh Tribe. Staff are seeking additional suggestions for partners throughout the region.

Question around overdose prevention kits specifically for xylazine (Tranq), noting a steep increase in use. There are currently no xylazine-specific kits on the market.

➤ **COMMUNITY OUTREACH EVENTS**

Salish BHASO staff completed six Community Summits/Resource Fairs in 2023. We provided an opportunity for community members, community organizations, and other parties to discuss behavioral health and related resources. Each event provided an opportunity for community agencies to provide information and participate in discussion. SBHASO staff provided a presentation on the role of the Salish BHASO. There was then an opportunity for the community to discuss needs and gaps in services. Some of the items that were discussed included housing concerns, substance use treatment access concerns, and general lack of information. We received positive feedback specific to providing a space for networking and engagement in each community.

Clallam County	Jefferson County	Kitsap County
<p>Port Angeles - June 28, 2023 4:00 pm – 6:00 pm</p> <p>Vern Burton Community Center 308 E. 4th Street Port Angeles, WA 98362</p>	<p>Quilcene – August 1, 2023 4:00 pm – 6:00 pm</p> <p>Quilcene Community Center 294952 Hwy 101 Quilcene, WA 98376</p>	<p>Kingston – July 24, 2023 4:00 pm – 6:00 pm</p> <p>Village Green Community Center 26159 Dulay Road NE Kingston, WA 98346</p>
<p>Forks – September 19, 2023 4:00 pm – 6:00 pm</p> <p>Forks Community Hospital 550 5th Avenue Forks, WA 98331</p>	<p>Chimacum – October 12, 2023 4:00 pm – 6:00 pm</p> <p>Tri-Area Community Center 10 West Valley Road Chimacum, WA 98325</p>	<p>Bremerton – October 3, 2023 4:00 pm – 6:00 pm</p> <p>Marvin Williams Recreation Center 725 Park Avenue Bremerton, WA 98337</p>

Staff aimed to reach rural communities by hosting several events in smaller towns. Information gathered will be used to inform the work and partnerships throughout 2024. Information was used to support budget decisions for 2024. Staff will continue to prioritize community education in 2024.

➤ **ADVISORY BOARD UPDATE**

SBHASO Advisory Board Chair, Jon Stroup, will provide an update on activities including recruiting and conference attendance by a Board member.

The Board successfully recruited two new members in 2023, including an individual from West Jefferson County.

51% of Board members are required to be individuals with lived experience or family members. Historically the Advisory Board has had law enforcement representation, which is a recruitment priority for 2024. Staff also hope to recruit youth through the Salish Youth Network Collaborative.

Advisory Board Meetings will continue to occur in a hybrid format (Zoom and 7 Cedars Hotel) from 10 am – 12 pm.

Plan to hold a joint Advisory Board and Executive Board meeting in 2024.

PUBLIC COMMENT

- None.

GOOD OF THE ORDER

- The convening of the Olympic Community of Health is scheduled for Monday December 11th at Kiana Lodge.

ADJOURNMENT – Consensus for adjournment at 11:00 a.m.

ATTENDANCE

BOARD MEMBERS	STAFF	GUESTS
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Commissioner Mark Ozias	Jolene Kron, SBHASO Administrator/Clinical Director	Lori Fleming, Jeff Co. CHIP
Commissioner Greg Brotherton	Nicole Oberg, SBHASO Program Specialist	Jenny Oppelt, Clallam County HHS
Commissioner Christine Rolfes	Ileea Clauson, SBHASO UM Manager, Privacy & Compliance Officer	
Celeste Schoenthaler, OCH Executive Director	Doug Washburn, Kitsap County Human Services	
Theresa Lehman, Tribal Representative		
<i>None Excused.</i>		

NOTE: These meeting notes are not verbatim.

SBH-ASO Risk Assessment

2023-2024

Definitions of Level of Risk (Low to High)

Low Risk	Medium Risk	High Risk
<p>Managing effectively and no current risk or issues in this area. Potential and probability for problems to occur at this level are considered rare or unlikely. Awareness is important, and if changes occur in relationship to the item/issue, then it should be reviewed and discussed for changes in risk level. Insignificant to marginal consequences. Less than 10% chance of occurring.</p>	<p>Managing sufficiently and no current risk or issues in this area. Potential for problems to occur in a variety of ways: occasional, interval, infrequent, consistent and/or seldom. Such risks are moderate and may not require extensive changes and/or resources. Marginal to moderate consequences. Less than 50% chance of occurring.</p>	<p>Concerns for potential item/issue to result in a problem and/or issue; may require immediate action, procedural modifications, access to extensive resources, or changes to policies and procedures with timelines and/or deliberations. Moderate to critical consequences. High likelihood for occurring and/or between 60-90% chance of occurring.</p>

Item/Issue	Level of Risk	Steps to Mitigate Risk	Priority	Comments
COVID-19 Pandemic				
<p>Continuation of Teleworking, initially in response to COVID-19 safety guidance, as there are increased risks related to privacy and security.</p>	<p>Medium</p>	<p>All staff were provided guidance information on working from home. This includes completing a Kitsap County employee VPN access request form and Telecommuting Agreement.</p> <p>Staff obtained secure VPN access to remote into secure network.</p> <p>Maintained regular meetings via online platform to assist in regular check-ins and to ensure collaborative work continues.</p> <p>Staff education about which online platform to utilize based upon type of information shared.</p> <p>Development of written protocol for management of PHI while working remotely.</p>		
Integrated Healthcare				

Item/Issue	Level of Risk	Steps to Mitigate Risk	Priority	Comments
<p>Frequency of change to HCA Behavioral Health Supplemental Data Guide (BHDG) creates risk of incorrect and untimely data submissions.</p> <p>Challenges in programmatic changes occurring prior to adequate stakeholder involvement</p>	High	<p>Consistently communicate concerns with existing process to HCA.</p> <p>Ensure consistent and timely communication with subcontractors regarding continuous state change to the BHDG.</p> <p>Communication to occur at the bi-monthly SBH-ASO Integrated Providers Meeting and via monthly data updates summary email issued by SBH-ASO IS Manager which is distributed network wide.</p>	#2 RISK	
<p>HCA document submission to Managed Program mailboxes receipt isn't consistent causing delays in HCA retrieval of contract deliverables</p>	Low	<p>SBH-ASO Staff can Cc HCA subject matter expert on emails when deliverables are being submitted</p> <p>SBH-ASO Staff can send email with read receipt function</p> <p>Include as a standing agenda item during the HCA/ASO quarterly check-in meeting with examples if available</p>		
Preventing Fraud, Waste, and Abuse (FWA)				
<p>Maintaining up-to-date understanding of the importance of preventing fraud, waste, and abuse.</p>	Medium	<p>Trainings to be provided: Prior-to or within 90 days of contractor or SBH-ASO hires, and at least annually thereafter.</p> <p>Ensure contractor's staff clearly understand to report suspected fraud/abuse to the SBH-ASO and State, per policy</p> <p>SBH-ASO annual Monitoring Reviews, which include Fiscal, Clinical, and Program Integrity components</p>		<p>All contractors have designated Compliance Officers</p>

Item/Issue	Level of Risk	Steps to Mitigate Risk	Priority	Comments
		<p>Quarterly SBH-ASO Quality and Compliance Committee (QACC) to share new information, problem solve, and discuss HHS/OIG news posted.</p> <p>SBH-ASO provides technical assistance and FWA trainings to subcontractors.</p>		
Incomplete or inaccurate credentialing of a Provider	Medium	SBH-ASO Credentialing Committee meetings utilize a hands-on approach to ensuring that information is provided, collected, and processed correctly; and that sensitive data (such as SSN) are redacted.		
Business Practices				
Billing processes are not fully integrated which can create potential for untimely billings, incomplete processing, and/or incorrect payments	Medium	<p>SBH-ASO is implementing program specific presentations in Team meetings to help ensure cross-program understanding.</p> <p>SBH-ASO is developing protocols to support internal error management.</p>		
Subcontractors and out-of-network providers not utilizing SBH-ASO authorization processes or verifying eligibility correctly.	Low	<p>All authorizations are completed by the SBH-ASO. With the exception of ITA services, if authorization cannot be verified the SBH-ASO will not pay.</p> <p>Redundant systems in place to verify eligibility at authorization, re-authorization, and billing stages.</p>		<p>Ranking/identification of payor of a service is the responsibility of each BHA</p> <p>BHAs have multiple payors</p>
Policy and Procedure accuracy – the pace of change, frequent contract changes, and programmatic additions have resulted in a	Medium	The policies and procedures are reviewed and updated biannually.		

Item/Issue	Level of Risk	Steps to Mitigate Risk	Priority	Comments
challenge to timely updates of SBH-ASO policies and procedures.				
Delays in timely issuance of revenue contracts or amendments creating cascading delays in amending subcontracts to include updated terms and issuing payment	High	<p>SBH-ASO proactively communicates anticipated contract changes to its network via bi-monthly Integrated Providers Meeting.</p> <p>SBH-ASO initiates contract amendments, as soon as sufficient revenue contract details are available, to reduce likelihood of disruption in subcontracts.</p>		
<p>Changes to Regional Crisis System as a result of State level (i.e., judicial, legislative, regulatory) changes could inhibit community response to behavioral health crises</p> <p>HB1688 planning and implementation</p> <p>Increase in complexity of service delivery with lack of clarity around organizational responsibilities</p>	High	<p>SBH-ASO proactively outreaches community partners and stakeholders and facilitates coordinated response efforts.</p> <p>SBH-ASO proactively outreaches State Agencies soliciting informational updates and clarifications.</p> <p>Ongoing participation in state and federal information sessions and program planning work sessions.</p>	#3 RISK	
<p>Process for procurement and/or administration of new program development while managing staff bandwidth, agency bandwidth, and challenges with information flow</p> <p>Significant leadership changes within SBH-ASO within short time period. Opportunity for evaluation of current organizational structures. How to reorganize in a way that better meets the needs of staff and</p>	High	<p>SBH-ASO Leadership Team routinely evaluates work priorities and adjusts staff work assignments accordingly.</p> <p>SBH-ASO Leadership Team evaluates projects that may need to be declined due to limited organizational bandwidth.</p> <p>SBH-ASO Leadership engages employees during routine supervision, and interactions to monitor for and respond to staff burnout.</p>	#1 RISK	

Item/Issue	Level of Risk	Steps to Mitigate Risk	Priority	Comments
tasks. Challenges with Kitsap County process of shifting staff job titles/roles.		<p>SBH-ASO develops routine tracking and monitoring into program development processes to ensure subcontractor understanding of new program requirements.</p> <p>Thoughtful transition preceding Medical Director and Administrator departures</p>		
<p>Statewide, local, and ASO workforce challenges:</p> <p>Shortage of administrative, entry-level clinical, and advanced professionals is a barrier to providing behavioral health services and program administration</p>	High	<p>SBH-ASO sponsored trainings to support new workforce training and development</p> <p>Participation in State level workforce development activities</p> <p>SBH-ASO Leadership has developed and maintains a highly collaborative relationship with Human Resources which assists with recruitment efforts</p>		
Kitsap County infrastructure changes that impact SBH-ASO operations (i.e., implementation of new financial system software, County staffing shortages, upgrades/patches to financial system software)	Low	SBH-ASO proactively works with other Kitsap County departments to ensure timely communication, trainings, and coverage needs are met during infrastructure changes.		
Implementation of new programs and subcontractors increases risk of potential for fraud, waste, abuse and privacy violations	Medium	<p>Each SBH-ASO subcontract includes terms for subcontractors and staff to adhere to FWA and privacy regulations, including training staff within 90 days of hire and annually thereafter.</p> <p>SBH-ASO monitors random sample of personnel files of subcontractors during annual monitoring to ensure staff of SBH-ASO funded programs receive appropriate training.</p>		

Item/Issue	Level of Risk	Steps to Mitigate Risk	Priority	Comments
		SBH-ASO Compliance Officer is available to subcontractors for Technical Assistance.		
SBH-ASO administers the R.E.A.L program in the Salish RSA serving an at-risk population with significant unmet needs.	High	<p>SBH-ASO staff provide significant onboarding and ongoing training to these teams, including continued support through the Regional and by County R.E.A.L Program Meetings.</p> <p>SBH-ASO provides ongoing and real time technical assistance to program staff.</p> <p>Statewide coordination efforts with the HCA and other Recovery Navigator Program teams.</p> <p>SBH-ASO coordinates access to Naloxone for these programs to help address the risk of overdose risk of individuals being served</p> <p>Continued engagement with community leadership through the Policy Coordinating Group (PCG)</p>		
Detecting Fraud, Waste, and Abuse (FWA)				
Detecting Fraud, Waste, and Abuse in the provision of services and business practices	Medium	<p>SBH-ASO annual Monitoring Reviews, which include Fiscal, Clinical, and Program Integrity components</p> <p>SBH-ASO Grievance Monitoring</p>		

Item/Issue	Level of Risk	Steps to Mitigate Risk	Priority	Comments
		<p>Ensure methods for reporting suspected fraud, waste, and abuse are readily available to the public, clients, and subcontractors</p> <p>Routine SBH-ASO Integrated Providers Meetings and Quality Assurance and Compliance Committee Meetings</p>		
Protected Health Information (PHI) & Information Technology (IT) Security Breaches:				
Workspace security and privacy	Medium	<p>Staff are instructed to ensure auditory privacy during phone conversations that contain PHI</p> <p>Policy requires keeping PHI locked in workspaces, unless in active use by an SBH-ASO staff</p> <p>Staff are instructed to take steps to reduce computer visibility by non SBH-ASO staff</p>		
Electronic exchange of PHI between SBH-ASO staff and external recipients	Medium	<p>SBH-ASO policy that all electronic communications which contain PHI must be encrypted.</p> <p>Regular review with staff of the need to ensure encryption is selected prior to transmitting PHI electronically.</p> <p>SBH-ASO facilitates role-based access to Provider Network via the SBH-ASO Provider Portal that is controlled through Microsoft Security Groups</p> <p>SBH—ASO utilizes HIPAA compliant Cognito Forms for transmission of utilization management data</p> <p>SBH-ASO utilizes Managed File Transfer (MFT)</p> <p>SBH-ASO will begin utilizing SBH-ASO Provider Portal for transmission of deliverables and PHI</p>		

Item/Issue	Level of Risk	Steps to Mitigate Risk	Priority	Comments
Privacy and training associated with implementation and oversight of new programs that are designed specifically around collaborative support increase reporting of privacy related concerns.	High	Awareness of privacy concerns has increased at an organizational level allowing SBH-ASO to identify areas of opportunity for intervention and training.		
Integrity of Data and IT Security	Medium	Maintain current SBH-ASO Disaster Recovery Plans in alignment with Kitsap County Disaster Recovery Plans Require subcontractors maintain current Agency Disaster Recovery Plans SBH-ASO Staff participates in training on these methods in accordance with industry standards, including OCIO standards		
Safety of the SBH-ASO Site:				
Maintenance of physical and security safeguards within the workplace	Low	Periodic evaluations of facility security as available from SBH-ASO Leadership and Kitsap County Management		

SBH-ASO Risk Assessment

~~2022-2023~~ 2023-2024

Definitions of Level of Risk (Low to High)

Low Risk	Medium Risk	High Risk
<p>Managing effectively and no current risk or issues in this area. Potential and probability for problems to occur at this level are considered rare or unlikely. Awareness is important, and if changes occur in relationship to the item/issue, then it should be reviewed and discussed for changes in risk level. Insignificant to marginal consequences. Less than 10% chance of occurring.</p>	<p>Managing sufficiently and no current risk or issues in this area. Potential for problems to occur in a variety of ways: occasional, interval, infrequent, consistent and/or seldom. Such risks are moderate and may not require extensive changes and/or resources. Marginal to moderate consequences. Less than 50% chance of occurring.</p>	<p>Concerns for potential item/issue to result in a problem and/or issue; may require immediate action, procedural modifications, access to extensive resources, or changes to policies and procedures with timelines and/or deliberations. Moderate to critical consequences. High likelihood for occurring and/or between 60-90% chance of occurring.</p>

Item/Issue	Level of Risk	Steps to Mitigate Risk	Priority	Comments
COVID-19 Pandemic				
Continuation of Teleworking, initially in response to COVID-19 safety guidance, as there are increased risks related to privacy and security.	Medium	<p>All staff were provided guidance information on working from home. This includes completing a Kitsap County employee VPN access request form and Telecommuting Agreement.</p> <p>Staff obtained secure VPN access to remote into secure network.</p> <p>Maintained regular meetings via online platform to assist in regular check-ins and to ensure collaborative work continues.</p> <p>Staff education about which online platform to utilize based upon type of information shared.</p> <p>Development of written protocol for management of PHI while working remotely.</p>		
Integrated Healthcare				

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<p>Frequency of change to HCA Behavioral Health Supplemental Data Guide (BHDG) creates risk of incorrect and untimely data submissions.</p> <p>Challenges in programmatic changes occurring prior to adequate stakeholder involvement</p>	High	<p>Consistently communicate concerns with existing process to HCA.</p> <p>Ensure consistent and timely communication with subcontractors regarding continuous state change to the BHDG.</p> <p>Communication to occur at the bi-monthly SBH-ASO Integrated Providers Meeting and via monthly data updates summary email issued by SBH-ASO IS Manager which is distributed network wide.</p>	#2 RISK	
<p>HCA document submission to Managed Program mailboxes receipt isn't consistent causing delays in HCA retrieval of contract deliverables</p>	Low	<p>SBH-ASO Staff can Cc HCA subject matter expert on emails when deliverables are being submitted</p> <p>SBH-ASO Staff can send email with read receipt function</p> <p>Include as a standing agenda item during the HCA/ASO quarterly check-in meeting with examples if available</p>		
Preventing Fraud, Waste, and Abuse (FWA)				
<p>Maintaining up-to-date understanding of the importance of preventing fraud, waste, and abuse.</p>	Medium	<p>Trainings to be provided: Prior-to or within 90 days of contractor or SBH-ASO hires, and at least annually thereafter.</p> <p>Ensure contractor's staff clearly understand to report suspected fraud/abuse to the SBH-ASO and State, per policy</p> <p>SBH-ASO annual Monitoring Reviews, which include Fiscal, Clinical, and Program Integrity components</p>		<p>All contractors have designated Compliance Officers</p>

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		<p>Quarterly SBH-ASO Quality and Compliance Committee (QACC) to share new information, problem solve, and discuss HHS/OIG news posted.</p> <p>SBH-ASO provides technical assistance and FWA trainings to subcontractors.</p>		
Incomplete or inaccurate credentialing of a Provider	Medium	SBH-ASO Credentialing Committee meetings utilize a hands-on approach to ensuring that information is provided, collected, and processed correctly; and that sensitive data (such as SSN) are redacted.		
Business Practices				
Billing processes are not fully integrated which can create potential for untimely billings, incomplete processing, and/or incorrect payments	Medium	<p>SBH-ASO is implementing program specific presentations in Team meetings to help ensure cross-program understanding.</p> <p>SBH-ASO is developing protocols to support internal error management.</p>		
Subcontractors and out-of-network providers not utilizing SBH-ASO authorization processes or verifying eligibility correctly.	Low	<p>All authorizations are completed by the SBH-ASO. With the exception of ITA services, if authorization cannot be verified the SBH-ASO will not pay.</p> <p>Redundant systems in place to verify eligibility at authorization, re-authorization, and billing stages.</p>		Ranking/identification of payor of a service is the responsibility of each BHA BHAs have multiple payors
Policy and Procedure accuracy – the pace of change, frequent contract changes, and programmatic additions have resulted in a	Medium	The policies and procedures are reviewed and updated biannually.		

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challenge to timely updates of SBH-ASO policies and procedures.				
Delays in timely issuance of revenue contracts or amendments creating cascading delays in amending subcontracts to include updated terms and issuing payment	High	<p>SBH-ASO proactively communicates anticipated contract changes to its network via bi-monthly Integrated Providers Meeting.</p> <p>SBH-ASO initiates contract amendments, as soon as sufficient revenue contract details are available, to reduce likelihood of disruption in subcontracts.</p>		
<p>Changes to Regional Crisis System as a result of State level (i.e., judicial, legislative, regulatory) changes could inhibit community response to behavioral health crises</p> <p>HB1688 planning and implementation</p> <p>Increase in complexity of service delivery with lack of clarity around organizational responsibilities</p>	High	<p>SBH-ASO proactively outreaches community partners and stakeholders and facilitates coordinated response effortefforts.</p> <p>SBH-ASO proactively outreaches State Agencies soliciting informational updates and clarificationsclarifications.</p> <p>Ongoing participation in state and federal information sessions and program planning work sessions.</p>	#3 RISK	
<p>Process for procurement and/or administration of new program development while managing staff bandwidth, agency bandwidth, and challenges with information flow</p> <p>Significant leadership changes within SBH-ASO within short time period. Opportunity for evaluation of current organizational structures. How to reorganize in a way that better meets the needs of staff and</p>	High	<p>SBH-ASO Leadership Team routinely evaluates work priorities and adjusts staff work assignments accordingly.</p> <p>SBH-ASO Leadership Team evaluates projects that may need to be declined due to limited organizational bandwidth.</p> <p>SBH-ASO Leadership engages employees during routine supervision, and interactions to monitor for and respond to staff burnout.</p>	#1 RISK	

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tasks. Challenges with Kitsap County process of shifting staff job titles/roles.		<p>SBH-ASO develops routine tracking and monitoring into program development processes to ensure subcontractor understanding of new program requirements.</p> <p>Thoughtful transition preceding Medical Director and Administrator departures</p>		
<p>Statewide, local, and ASO workforce challenges:</p> <p>Shortage of administrative, entry-level clinical, and advanced professionals is a barrier to providing behavioral health services and program administration</p>	High	<p>SBH-ASO sponsored trainings to support new workforce training and development</p> <p>Participation in State level workforce development activities</p> <p>SBH-ASO Leadership has developed and maintains a highly collaborative relationship with Human Resources which assists with recruitment efforts</p>		
<p>Kitsap County infrastructure changes that impact SBH-ASO operations (i.e., implementation of new financial system software, County staffing shortages, upgrades/patches to financial system software)</p>	Low	<p>SBH-ASO proactively works with other Kitsap County departments to ensure timely communication, trainings, and coverage needs are met during infrastructure changes.</p>		
<p>Implementation of new programs and subcontractors increases risk of potential for fraud, waste, abuse and privacy violations</p>	Medium	<p>Each SBH-ASO subcontract includes terms for subcontractors and staff to adhere to FWA and privacy regulations, including training staff within 90 days of hire and annually thereafter.</p> <p>SBH-ASO monitors random sample of personnel files of subcontractors during annual monitoring to ensure staff of SBH-ASO funded programs receive appropriate training.</p>		

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		SBH-ASO Compliance Officer is available to subcontractors for Technical Assistance.		
SBH-ASO administers the R.E.A.L program in the Salish RSA serving an at-risk population with significant unmet needs.	High	<p>SBH-ASO staff provide significant onboarding and ongoing training to these teams, including continued support through the Regional and by County R.E.A.L Program Meetings.</p> <p>SBH-ASO provides ongoing and real time technical assistance to program staff.</p> <p>Statewide coordination efforts with the HCA and other Recovery Navigator Program teams.</p> <p>SBH-ASO coordinates access -to Naloxone for these programs to help address the risk of overdose risk of individuals being served</p> <p>Continued engagement with community leadership through the Policy Coordinating Group (PCG)</p>	#3-RISK	
Detecting Fraud, Waste, and Abuse (FWA)				
Detecting Fraud, Waste, and Abuse in the provision of services and business practices	Medium	<p>SBH-ASO annual Monitoring Reviews, which include Fiscal, Clinical, and Program Integrity components</p> <p>SBH-ASO Grievance Monitoring</p>		

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		<p>Ensure methods for reporting suspected fraud, waste, and abuse are readily available to the public, clients, and subcontractors</p> <p>Routine SBH-ASO Integrated Providers Meetings and Quality Assurance and Compliance Committee Meetings</p>		
Protected Health Information (PHI) & Information Technology (IT) Security Breaches:				
Workspace security and privacy	Medium	<p>Staff are instructed to ensure auditory privacy during phone conversations that contain PHI</p> <p>Policy requires keeping PHI locked in workspaces, unless in active use by an SBH-ASO staff</p> <p>Staff are instructed to take steps to reduce computer visibility by non SBH-ASO staff</p>		
Electronic exchange of PHI between SBH-ASO staff and external recipients	Medium	<p>SBH-ASO policy that all electronic communications which contain PHI must be encrypted.</p> <p>Regular review with staff of the need to ensure encryption is selected prior to transmitting PHI electronically.</p> <p>SBH-ASO facilitates role-based access to Provider Network via the SBH-ASO Provider Portal that is controlled through Microsoft Security Groups</p> <p>SBH—ASO utilizes HIPAA compliant Cognito Forms for transmission of utilization management data</p> <p>SBH-ASO utilizes Secure File Transfer (SFT) and Managed File Transfer (MFT)</p> <p>SBH-ASO will begin utilizing SBH-ASO Provider Portal for transmission of deliverables and PHI</p>		

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Privacy and training associated with implementation and oversight of new programs that are designed specifically around collaborative support increase reporting of privacy related concerns.	High	Awareness of privacy concerns has increased at an organizational level allowing SBH-ASO to identify areas of opportunity for intervention and training.		
Integrity of Data and IT Security	Medium	<p>Maintain current SBH-ASO Disaster Recovery Plans in alignment with Kitsap County Disaster Recovery Plans</p> <p>Require subcontractors maintain current Agency Disaster Recovery Plans</p> <p>SBH-ASO Staff participates in training on these methods in accordance with industry standards, including OCIO standards</p>		
Safety of the SBH-ASO Site:				
Maintenance of physical and security safeguards within the workplace	Low	Periodic evaluations of facility security as available from SBH-ASO Leadership and Kitsap County Management		