



## SALISH BH-ASO POLICIES AND PROCEDURES

**Policy Name:** OMBUDS SERVICES

**Policy Number:** QM702

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### PURPOSE

To define the roles and responsibilities of Ombuds Services. The Ombuds help ensure Individual and Medicaid rights are upheld, that Individuals have access to information and referral, advocacy, and assist in navigating grievances and appeals processes. Ombuds, if requested, also provide assistance with the State Administrative Hearing process. The Ombuds have unencumbered access to the Behavioral Health Agencies (BHAs) that are contracted with Salish Behavioral Health Administrative Services Organization (SBH-ASO).

### POLICY

SBH-ASO administers Ombuds services for all Individuals in its defined service area, regardless of an Individuals ability to pay, including Medicaid eligible members.

### PROCEDURE

1. SBH-ASO ensures the Regional Ombuds:
  - a. Are provided by Individuals with lived experience.
  - b. Has separation of personnel functions from the SBH-ASO. (e.g., hiring, salary, and benefits determination, supervision, accountability, and performance evaluations)
  - c. Maintains independent decision making that includes all activities, findings, recommendations and reports.
  - d. Are responsive to the age and demographic character of the region and assists and advocates for Individuals with resolving grievances at the lowest possible level;

- e. Are independent from Contracted Services providers such as BHAs.
  - f. Receive Individual, family member, and other interested party grievances;
  - g. Are accessible to Individuals, including a toll-free, independent phone line for access;
  - h. Can access service sites and records relating to the Individual with appropriate releases so that it can reach out to Individuals, and to assist the Individual through the Grievance and Appeals process and at the Individual's request, assist or represent the Individual with the State Administrative Hearing process;
  - i. Receives training and adheres to confidentiality consistent with the current HCA- BH-ASO contract, WAC 182-538D-0262 and RCW 71.05, 71.24 and 70.02;
  - j. Continues to be available to advocate and assist the Individual through the grievance, appeal, and the Administrative Hearing processes;
  - k. Involves other persons, at the Individual's request;
  - l. Coordinates and collaborates with allied systems' advocacy and Ombuds services to improve the effectiveness of advocacy and to reduce duplication of effort for shared Individuals. Engages local advocacy groups, and SBH-ASO's network providers.
  - m. Provides reports, feedback, grievance data and formalized recommendations at least biannually to Quality Assurance and Compliance Committee (QACC), SBH-ASO Advisory and Executive Board, and to the HCA.
  - n. Are integrated into the overall SBH-ASO quality management process to create opportunities for improvements and changes to the behavioral health system that are reflective of Individual voice and experience as appropriate.
2. SBH-ASO providers collaborate with the Ombuds service staff and ensure that provider staff understand the role of the Ombuds service. The provider :
- a. Ensures unencumbered and timely access to provider staff involved in Ombuds Service inquiry or investigation, including access to private office space as requested;
  - b. Ensures current Ombuds service materials are continuously available to Individuals and are posted in a conspicuous place so that Individuals and family members have access at every service location without special request;
  - c. Assists in problem resolution and make best efforts to resolve concerns and grievances at the lowest possible level, except where to do so would not be reasonable;
  - d. Makes every effort to ensure no discriminatory, disciplinary, or retaliatory action is taken against a provider or Individual for any communications

made or information given or disclosed to aid the Ombuds service staff in completing their duties and responsibilities.

3. Monitoring

- a. Annual administrative and fiscal review
- b. Review of quarterly reports at QACC
- c. Bi-annual presentation of contacts and trends to Behavioral Health Advisory Board.
- d. On-going consultation on a case-by-case basis with SBH-ASO Staff.

Any concerns regarding performance or contract non-compliance will be addressed in accordance with SBH-ASO Policy: Provider Network Selection and Management.