

NORTHCARE NETWORK

POLICY TITLE: Accessibility & Accommodation Policy	CATEGORY: Customer Services/Recipient Rights	
EFFECTIVE DATE: 6/26/02	BOARD APPROVAL DATE: 2/6/13	
REVIEWED DATE: 12/21/23	REVISION(S) TO POLICY STATEMENT: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	OTHER REVISION(S): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
RESPONSIBLE PARTY: Customer Service Specialist	CEO APPROVAL DATE: 1/4/24 Megan Rooney, CEO	

APPLIES TO

NorthCare Network Personnel
Network Providers

POLICY

It is the policy of NorthCare Network and all Network Providers to recognize the diversity in the population of its service area along a number of dimensions including, but not limited to: ethnicity, gender, age, language proficiency, socioeconomics, spiritual beliefs, and physical and communication challenges. Staff must be sensitive to and appreciate how important accommodation is to effective service delivery. Creating an atmosphere of welcoming, openness, and equal opportunity requires a physical environment designed to eliminate potential barriers; ongoing staff training regarding the assessment of the need for accommodations; and the actual implementation of necessary modifications. NorthCare Network requires each Network Provider to have policies, procedures and practices that promote equal accessibility for all consumers and ongoing staff training in these areas:

- Access and accommodation of persons with limited English proficiency.
- Sensitivity and accommodation of diverse ethnic and cultural backgrounds (e.g., Native Americans).
- Accommodations for those with visual impairments or mobility challenges.
- Accommodations for individuals with communication impairments (including persons who do not use verbal language to communicate or who use alternative forms of communicating (e.g., TTY).
- Staff education on the importance of each individual's diverse needs and the necessity to utilize person-centered thinking to create individual plans of service and actions to meet those needs. This training will recognize the disabilities affecting members may not be visible to the naked eye and may require accommodations in areas such as recognizing the effects of medications, adjusting meeting schedules and the length of meetings.
- A commitment to remove any barrier that may not be currently addressed. This may be accomplished by a variety of means: e.g. focus groups, consumer complaints, consumer surveys.

NorthCare Network will monitor the Network Provider's compliance with these requirements during site reviews and reviews done by the Quality Management and Oversight Committee.

NorthCare Network's policy on Accessibility and Accommodations will be reviewed annually by NorthCare Network staff and the Customer Services Committee. NorthCare Network is responsible to follow the procedures outlined below as they pertain to the Prepaid Inpatient Health Plan (PIHP).

PURPOSE

NorthCare Network will ensure that all services provided by its Network Providers are accessible for all Medicaid Specialty and Supports and Healthy Michigan consumers in the Upper Peninsula. The Americans with Disabilities Act (particularly Title I and Title II) will be the standard used to assure that individuals with disabilities have an equal opportunity to benefit from all of the services offered by the Network Provider. Programs and services shall be optimally accessible to persons served by the removal of barriers to services including architectural, attitudinal, employment, language, and/or other identified barriers.

DEFINITIONS

1. ***Discrimination***: Illegal treatment either intentional or unintentional of a person or group based on race, color, national origin, language spoken, sexual orientation, gender identity, religion, certain age limitations, sex, marital status, physical or mental handicap or inability to pay for services. This includes the failure to remedy the effects of past discrimination.
2. ***Limited English Proficiency***: A person who does not use English as their choice of oral or written method of communication.
3. ***Qualified Translator/Interpreter***: A person who has been tested and certified by a recognized body to provide an accurate interpretation from English to the oral or written language of the recipient. The interpreter must be familiar with the terminology to be used and be committed to confidentiality.
4. ***Telephone Interpretation Service***: Interpreters who provide interpretation services over the telephone.
5. ***Vital Documents***: Consent forms, NorthCare Network Customer Handbook, person centered plans, grievance and appeals process, anything requiring a response from a recipient of services.

REFERENCES

- Americans with Disabilities Act
- NorthCare Network QAPIP Plan
- NorthCare Network Enrollee Recipient Rights Policy
- NorthCare Network Access Policy

HISTORY

REVISION DATE: 1/30/13, 1/7/15, 9/6/16, 12/1/17, 10/23/18, 7/16/19, 6/10/21, 4/19/22, 12/21/23

REVIEW DATE: 1/13/11, 1/30/13, 11/27/13, 8/27/14, 2/3/15, 11/24/15, 9/6/16, 7/25/17, 12/1/17, 10/23/18, 7/16/19, 7/28/20, 6/10/21, 4/19/22, 2/21/23, 12/21/23

CEO APPROVAL: 1/30/13, 11/27/13, 8/27/14, 2/3/15, 12/1/15, 10/4/16, 8/1/17, 1/8/18, 9/16/19, 8/4/20, 7/12/21, 5/3/22, 3/7/23, 1/4/24

BOARD APPROVAL: 8/27/03, 11/2/05, 5/3/06, 2/6/13, 11/6/18

PROCEDURES

A. Accessibility

NorthCare Network will monitor the Providers in the following areas:

1. The provider must demonstrate the ability to identify and respond to a variety of different needs for language accommodations. These may include making accommodations for an individual with a hearing or speech loss; an individual with English as a second language or an individual with limited English proficiency. The agency must have adequate technology and the ability to provide the audio and written formats to respond to a consumer's needs. The Network Provider will have procedures in place to obtain any necessary resources to respond to a specific need. Choices regarding services and providers must be available in understandable and varied formats.
2. Geographic access to supports and services shall be in accordance with the following standards:
 - a. For office or site-based services, the recipient's primary service provider (e.g. case manager, psychiatrist, primary therapist) must be within 60 miles or 60 minutes of the recipient's residence.
 - b. If transportation is requested by a consumer with special needs, the Member CMHSP will help make arrangements with the parties with whom that responsibility is shared: The Department of Health and Human Services and the Upper Peninsula Health Plan.
3. Employment opportunities will be available to all eligible consumers. NorthCare Network endorses a philosophy that providers hire/train individuals with disabilities. All providers will maintain compliance with all Federal regulations including accessibility and ongoing compliance with ADA standards.
4. NorthCare Network complies with all applicable Federal civil rights laws and does not discriminate on the basis of race, color, age, ethnicity, language, sexual orientation, gender identity or expression, national origin, religion/spirituality, age or disability. NorthCare will ensure that the Notice of Non-Discrimination and Accessibility Requirements and the multi – language taglines are provided to individuals annually and included with any significant publication. The Notice of Non-Discrimination and Accessibility will be provided to individuals in all of the following ways:
 - a. At the initial time of intake and annually thereafter.
 - b. Any time they request a copy of the NorthCare Customer Handbook.
 - c. Any time a Notice is generated and sent from the Electronic Medical Record (ELMER).
 - d. It is located on the NorthCare website: www.northcarenetwork.org.
 - e. It is included with any significant publication.

B. Accommodations

1. Each Network Provider will have an accommodation policy. NorthCare Network will monitor the Accommodation policy during site reviews via desk audit. The policy will be reviewed annually by their Customer Services Committee to evaluate the success of:
 - a. The identification and enumeration of barriers in the areas of employment, consumer and staff education, architectural, transportation, timeliness of services and accommodations.
 - b. Devising strategies to address identified barriers including timelines and assigned staff.
 - c. The implementation of these strategies and evaluation of its success.
 - d. A community education plan to inform the public of our priority populations and steps taken to reduce stigma.
 - e. An ongoing process to review consumer complaints and their resolution.
2. Reporting: The regional Customer Services Committee and the local Member CMHSP Customer Services Committees are responsible to report to the Quality Improvement Council on the review and evaluation of the activities undertaken to accomplish the above mandates.
3. Limited English Proficiency
 - a. NorthCare Network and all providers will ensure that all vital documents are available in any format necessary for populations that comprise more than 1% of the general population in the region. (Currently, that does not require any documents to be translated.)
 - b. NorthCare Network and Network Providers will have all vital documents translated into languages that are requested by consumers. The priority documents that have been established by NorthCare Network Customer Services are:
 - i. Release of Information Forms.
 - ii. NorthCare Network Customer Handbook.
 - iii. Medication Instructions.
 - iv. Person Center Planning materials.
 - c. NorthCare Network and Network Providers will ensure that accommodations are provided to assist with understanding materials for individuals with special needs such as cognitive or physical impairments. Customer Services will provide individuals or their families' information on how to request an accommodation.
 - d. Annual limited English proficiency training will occur at NorthCare Network and all Network Providers for all staff.
 - e. NorthCare Network will have available audio-versions of the NorthCare Network Customer Handbook available on the NorthCare website at: www.northcarenetwork.org.
 - f. NorthCare Network and all Network Providers will have procedures in place to provide translation and interpretation services to any individual

seeking services who requests such. These procedures will at a minimum include the following:

- i. Maintained list of internal staff that may be available to interpret and the certification they have to do so.
 - ii. Telephone interpretation services for individuals for emergency and intake processes (via Language Line Services.)
 - iii. An identified agency to provide qualified translation services for consumers during services.
 - iv. It is the policy of NorthCare Network that staff will communicate with recipients that the use of a family member and/or friend as a language interpreter is not recommended.
 - v. If an individual chooses to utilize a family member and/or friend as a language interpreter, staff will document the choice.
- g. Translation and interpretation services will be provided at no cost to the consumer.
- h. Monitoring of Network Providers for adherence to these standards will occur during the Annual NorthCare Network Site Reviews.