

## NORTHCARE NETWORK

**POLICY TITLE:** Accessibility & Accommodation  
Policy & Procedures

**POLICY EFFECTIVE DATE:** June 26, 2002

**BOARD ADOPTED:** June 26, 2002

**BOARD ADOPTED REVISIONS:**  
8/27/03; 11/2/05; 5/3/06

**REVIEWED/REVISED:**

Member Services Comm.

May 22, 2003/Aug 4, 2003

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### **PURPOSE**

NorthCare Network will ensure that all services provided by its network affiliates are accessible for all Medicaid 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 five NorthCare Community Mental Health Boards and the Substance Abuse Provider Network. Programs and services shall be optimally accessible to persons served by the removal of barriers to services including architectural, attitudinal, employment and/or other identified barriers.

### **POLICY**

NorthCare recognizes 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 requires each Affiliate 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 (cross reference-NorthCare Access Policy).
- 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 will monitor the Affiliates' compliance with these requirements during site reviews and reviews done by the Quality Council. NorthCare Network's policy on Accessibility and Accommodations will be reviewed annually by NorthCare staff and the Customer Services Committee. NorthCare is responsible to follow the procedures outlined below as they pertain to the Prepaid Inpatient Health Plan (PIHP).

## **PROCEDURES**

### **A. Accessibility**

NorthCare 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 Community Mental Health Service Provider (CMHSP) or Substance Abuse 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:
  - For office or site-based mental health services, the mental health 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.
  - For office or site-based substance abuse services, the substance abuse service recipient's primary service provider (e.g. therapist) must be within 60 miles or 60 minutes of the recipient's residence.
  - If transportation is requested by a consumer with special needs, the CMH will help make arrangements with the parties with whom that responsibility is shared: the Department of Human Services and the Upper Peninsula Health Plan.

3. Employment opportunities will be available to all eligible consumers. NorthCare 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.

#### B. Accommodations

1. Each CMHSP and Substance Abuse Provider will have an accommodation policy. NorthCare 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:
  - The identification and enumeration of barriers in the areas of employment, consumer and staff education, architectural, transportation, timeliness of services and accommodations.
  - Devising strategies to address identified barriers including timelines and assigned staff.
  - The implementation of these strategies and evaluation of its success.
  - A community education plan to inform the public of our priority populations and steps taken to reduce stigma.
  - An ongoing process to review consumer complaints and their resolution.
2. Reporting: The regional Customer Services Committee and the local CMH 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

#### **REFERENCES**

American's with Disabilities Act  
NorthCare Quality Improvement Plan  
NorthCare Enrollee Rights and Protections Policy  
NorthCare Access Policy