Readiness Criteria Document



Transforming lives

	Plan Area	Review Team Assigned	Item Number Assigned
l.	General and Overall Transition Plan		
II.	Transition and Coordination of Services Plan i. Before implementation ii. After implementation		3,4,5,20,30,35,36,41,44
III.	Communications and Stakeholder Plan i. Consumers ii. Providers iii. Advisory Board iv. Stakeholders v. Staff		16,17,23,38
IV.	Network Analysis and Development Plan i. Mental Health ii. Substance Use Disorder		7,10,12,13,18,39,43,46

Optum-Pierce BHO

V.	Staffing and Workforce Analysis and Development Plan i. Training ii. Personnel iii. Ombuds	11,29	
VI.	Financial and Administrative Plan	15,25,26,28,	
VII.	Utilization Management Plan	8,9,40,42,45,47	
VIII.	Quality Assurance Plan	48	
IX. —	Program Integrity Plan		
X.	Grievance System Plan	50-80	
XI.	Tribal Communication and Coordination Plan	27	

XII.—Evidence Based, Research Based and Promising Practices Not Required as of amendment dated 8-31-15					
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————ii.—Adults					
————iii. Older Adults					
XIII. Behavioral Health Data Consolidation Project Plan		49			
Exhibit G: WISE		24			

	А	В	С	D	E
1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
2	RCW 43.20A	DEPARTMENT OF SOCIAL AND HEALTH SERVICES			
3	RCW 43.20A.894	contracting process.	Address each requirement of these provisions. Specifically, describe how you will use provider reimbursement methods that incentivize improved performance with contractually required client outcomes, integration of behavioral and primary care services at the clinical level, and improved care coordination for individuals with complex care needs (address Apple Health coordination).	II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation	
4	RCW 43.20A.895	Adult Behavioral Health System - Improvement Strategy	Address the requirements of these provisions. Specifically, describe how you will address performance improvement in compliance with the PIHP Contract for those measures included in that contract.	II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation	
5	RCW 43.20A.896	Behavioral health organizations - access to chemical dependency and mental health professionals.	Describe how you will comply with the requirement to offer contracts to managed health care systems or primary care practice settings to promote access to the services of chemical dependency professionals and mental health professionals for the purposes of integrating such services into primary care settings for individuals with behavioral health and medical comorbidities. Provide a list of existing contracting arrangements and a description of planned efforts to promote clinical integration.	II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation	
٦	RCW 70.96	ALCOHOLISM			
6					

	А	В	С	D	E
1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
7	RCW 70.96A.080		(1) Describe your system of care for substance use disorder treatment. Include specifically how it will include a full continuum of care, in accordance with ASAM levels of care as described in the PIHP Draft Contract, that includes withdrawal management, residential treatment and outpatient treatment for youth, pregnant and parenting women, and adults. (2) Describe how you will fund the services and incorporate and coordinate with public and private resources. (3) Describe how you will address emerging substance use disorder challenges, such as new trends in opiate, methamphetamine or marijuana use adn treatment. (3) Describe your involuntary commitment program. (4) Describe your use of Medication Assisted Treatment therapies. (5) Provide a comprehensive assessment of evidence based, research based and promising practices both currently provided and planned to address substance use disorder treatment. Separate the these by youth, adult and older adult.	IV. Network Analysis and Development Plan i. Mental Health ii. Substance Use Disorder	
8	RCW 70.96A.097 RCW 70.96A.100	treatment of minors - determination of	How will you assure an independent review occurs for minors admitted under the provisions of 70.96A.245 that meets these requirements? This requirement will be delegated to the BHO by the Department.	VII. Utilization Management Plan VII. Utilization Management Plan	
9			Describe your utilization management system and how you will ensure substance use disorder treatment services are provided to Medicaid enrollees for whom they are medically necessary. Include a process for determining when and how much treatment is offered for other non-Medicaid populations based on the state's priorities. Describe-how will you address emerging substance use disorder challenges, such as new trends in opiate, methamphetamine or marijuana use and treatment.		

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1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
10	RCW 70.96A.110	Voluntary treatment of individuals with a substance use disorder.	Describe how you will document compliance with these requirements by any organization directly providing services to clients.	IV. Network Analysis and Development Plan i. Mental Health ii. Substance Use Disorder	
11	RCW 70.96A.120	Treatment program and facilities - admissions - peace officer duties - protective custody.	Describe how you will assure compliance with the requirements.	V. Staffing and Workforce Analysis and Development Plan i. Training ii. Personnel iii. Ombuds	
12	RCW 70.96A.140	Involuntary commitment.	Describe your program for involuntary commitment, including all agreements and arrangements in-place or planned with all entities with a required role in the involuntary commitment process.	IV. Network Analysis and Development Plan i. Mental Health ii. Substance Use Disorder	
13	RCW 70.96A.142	Evaluation by designated chemical dependency specialist - when required - required notifications.	Describe how you will assure that required evaluations and notifications are performed. Include all agreements and arrangements in-place or planned with all entities with shared responsibility for administration, i.e., CDPs, jails, courts, and Department of Corrections.	IV. Network Analysis and Development Plan i. Mental Health ii. Substance Use Disorder	
14	RCW 70.96A.157	Persons subject to court ordered treatment or supervision documentation.	For individuals who are under the supervision of the Department of Corrections, describe how you would meet the coordination of care requirements under this provision.		
15	RCW 70.96A.180	Payment for treatment - Financial ability of patients.	Describe how will you administer patient financial responsibility for non-Medicaid services	VI. Financial and Administrative Plan	

Attestation Signature:Date:	
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1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
16	RCW 70.96A.300	Counties may create alcoholism and other drug addiction board - generally.	Address advisory board membership in compliance with Exhibit F, BHO Advisory Board Membership.	III. Communications and Stakeholder Plan i. Consumers ii. Providers iii. Advisory Board iv. Stakeholders v. Staff	
17	RCW 70.96A.350 RCW 70.96A.410	Criminal justice treatment account. Opiate substitution treatment -	Describe how you will ensure substance use disorder treatment services are provided to persons enrolled in substance use disorder treatment under the criminal justice treatment account. Describe how you will develop your local plan in conjunction with the stakeholder groups described in this section and as described in the draft PIHP contract. Describe your use of Medication Assited Treatment Therapies.	III. Communications and Stakeholder Plan i. Consumers ii. Providers iii. Advisory Board iv. Stakeholders v. Staff	
18	New 70.50A.410	program certification by department, department duties - definition of opiate substitution treatment.		i. Mental Health ii. Substance Use Disorder	
19	RCW 71.05	MENTAL ILLNESS			
20	RCW 71.05.365	Involuntary commitment - Individualized discharge plan. (Effective July 1, 2018.)	Describe your current process for discharge planning and describe how you would propose transitioning that process to meet the requirement to work with the hospital to develop an individualized discharge plan and arrange for a transition to the community in accordance with the person's individualized discharge plan within twenty one days of the determination by July 1, 2018.	II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation	
	RCW 71.24	COMMUNITY MENTAL HEALTH			
21		SERVICES ACT			

	А	В	С	D	E
1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
	RCW 71.24.015(1)	Legislative intent and policy.	(1) Describe how you will address access to care, the provision of a full array of services and identification of needs for youth, adults and older adults in compliance with this-section. (2) Provide a comprehensive assessment of Evidence Based Practices, Research Based and Promising Practices currently available and a plan to address any gaps and expansion of practices, including workforce development. staffing and training. Separate the response by Youth, Adults and Older Adults.		
22	RCW 71.24.015(2)	Legislative intent and policy.	Describe how you will involve persons with lived behavioral health experience, their families and advocates in designing and implementing behavioral health services in compliance with this section.	III. Communications and Stakeholder Plan i. Consumers ii. Providers iii. Advisory Board iv. Stakeholders v. Staff	
_	RCW 71.24.055	Children's mental health services - children's access to care standards and benefit package.	Describe your current capacity for WISe services and your planning to have sufficient capacity to provide fully compliant WISe services in accordance with the WISe Manual and the PIHP Draft Contract. Based on the WISe Capacity Expansion document attached as Exhibit G. As of April 1, 2016, what caseload capacity will the BHO have to provide WISe? What is the plan for the BHO to meet the FY16 June 30, 2016 WISe monthly capacity goal?	Exhibit G: WISE	
	RCW 71.24.100	Joint agreements of county authorities - required provisions.	If the proposed Behavioral Health Organization involves more than one county, provide a copy of the required agreement that meets the requirements of this section.	VI. Financial and Administrative Plan	
26	RCW 71.24.110	Joint agreements of county authorities - permissive provisions.	If the proposed Behavioral Health Organization involves more than one county, provide a copy of the required agreement that addresses this section.	VI. Financial and Administrative Plan	

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1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
	RCW 71.24.300 (1, 2, 3, 4, & 5)	Behavioral health organization - inclusion of tribal authorization - roles and responsibilities.	(1) Describe how you will comply with the tribal requirements of these sections. How will the BHO allow for the inclusion of the tribal authority to be represented as a party to the behavioral health organization?(2) Provide a work plan for the implementation of the American Indian Addendum, Exhibit E to the DPR. (3) Address how you will assure that Al/AN enrollees have equal access to behavioral health services. (4) Describe how you will provide culturally competent services to Al/AN. (5) Describe-your plan to respond to Tribal ITA court orders for Substance Use Disorder Treatment. How will the BHO provide for a continuation and/or transition of this practice to assure access to these services by tribal members? (6) Address coordination with Tribal providers and provide any written agreements.	XI. Tribal Communication and Coordination Plan	
27					
	RCW 71.24.340	Behavioral health organizations - agreements with city and county jails.	Provide copies of any agreements with jails or plans for agreements with jails.	VI. Financial and Administrative Plan	
28	RCW 71.24.350	Mental health ombuds office.	Describe plans to provide behavioral health ombuds services, that will meet the needs	V. Staffing and Workforce Analysis and	
29	NCW 71.24.330	Wental health offisides office.		Development Plan i. Training ii. Personnel iii. Ombuds	
30	RCW 71.24.845	Behavioral health organizations - Transfers between organizations.	Discuss how your transfer process to ensure a seamless and safe transition in services, including the sharing of information. Discuss how your transfer process will work with a region that is fully integrated and is not managed by a BHO.	II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation	
31 32	RCW 71.34	Mental Health Services for Minors			

	А	В	С	D	E
1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
33	RCW 71.34.600	Parent may request determination- whether minor has mental disorder- requiring inpatient treatment – minor- consent not required – duties and- obligations of professional person and- facility.	Describe the process for responding to a parent request, including documentation of resources offered.		
34	RCW 71 34 730	Potition for fourtoon-day commitment	Describe the process for identifying alternatives to commitment.		
35	RCW 71.34.750	Petition for one hundred eighty-day	(1) Describe how you coordinate with the CLIP administration. (2) Describe the process for identifying alternatives to commitment.	II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation	
	RCW 71.34.780	-	Describe how you will coordinate, assess and monitor intensive community services and coordinate with inpatient/residential resources.	II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation	
36 37		FEDERAL REGULATIONS			
37	42 CFR 422.208, 42 CFR 422.210, 42 CFR 431.230, 42 CFR 438.10(f)(3), 42 CFR 438.10(f)(6), SMD Letter 01/21/98, 42 CFR 438.10(f)(6)(iv), 42 CFR 438.10(g)(1), 42 CFR 438.10(h), 42		Describe how you will notify and provide information regarding changes from BHO Integration to enrollees, providers and allied systems with whom you coordinate care.	III. Communications and Stakeholder Plan i. Consumers ii. Providers iii. Advisory Board iv. Stakeholders v. Staff	

	А	В	С	D	E
1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
39	42 CFR 438.206(b)(1)	Delivery network.	 Provide a detailed analysis of your delivery network that demonstrates that the network: a. Is or will be supported by written agreements. b. Is sufficient to provide adequate access to all services covered under the contracts, and, if it is not sufficient, provides a plan to correct the deficiency. Consider the time and distance standards in the draft PIHP contract attached. c. Considers anticipated Medicaid enrollment, expected utilization, provider requirements (number and type), provider capacity, and location and physical access to providers. Include how language and cultural considerations will be addressed. d. Includes providers who can meet the needs of pregnant women, as identified in the contracts as a special healthcare need, with a Substance Use Disorder diagnosis. e. Includes providers who can address the needs of individuals who have either been referred through the Department of Corrections, Drug Courts or identified through activities funded by the Criminal Justice Treatment Account. Provide a list of contracted or anticipated contracted providers and the services they will provide, based on the state plan modalities and state funded priority services as described in the draft contracts and supplemental SUD Service descriptions. Describe the documentation and provide a sample format that you would be prepared to submit to DSHS on a periodic basis to demonstrate the sufficiency of your	IV. Network Analysis and Development Plan i. Mental Health ii. Substance Use Disorder	
40	42 CFR 438.206(b)(3)	Second opinion.	Provide information on how enrollees obtain a second opinion for all behavioral health services.	VII. Utilization Management Plan	
41	42 CFR 438.206(b)(3)	Out-of-network services.	Provide information on how enrollees can receive medically necessary out-of-network SUD services when those services are not obtainable within your network or not obtainable within the timeframes specified in the contract.	II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation	
42	42 CFR 438.206)c)((1)(i, ii, iii, iv, v, & vi)	Timely access.	Describe how you will assure and monitor timely access to care. Consider the Access standards in the draft PIHP contract attached for Routine, Urgent and Emergent.	VII. Utilization Management Plan	

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1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
43		Documentation of adequate capacity and services.	Describe the documentation that you would be prepared to submit to DSHS on a periodic basis to demonstrate the sufficiency of your network.	IV. Network Analysis and Development Plan i. Mental Health ii. Substance Use Disorder	
44		Primary care and coordination of health care services.	Fully describe how you will coordinate services with the health care system in compliance with this provision, the PIHP contract and good practice. Provide agreements, proposed agreements and policies and procedures.	II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation	
45	438.210(b)(1, 2, &	Authorization of services.	Describe your utilization management system and how it will be modified to provide all utilization management activities, including authorization of services, for substance use disorder services.	VII. Utilization Management Plan	
46	42 CFR 438.12(a)(2), 42 CFR 438.214	Contracts with providers.	Provide a list of contracted or anticipated contracted providers and the services they will provide.	IV. Network Analysis and Development Plan i. Mental Health ii. Substance Use Disorder	
	42 CFR 438.6(I), 42	Subcontractual relationships and delegation.	Provide sample subcontracts and/or delegation agreements. Provide policies and procedures for subcontracting and delegation that address these regulatory requirements and specifically address how subcontracted/delegated entities are evaluated and monitored. Provide the most recent monitoring reports for three entities. Describe in detail your current and planned subcontracting/delegation activities for substance use disorder treatment services.	VII. Utilization Management Plan	
47		- H			
48	& 2), 42 CFR 438.240(b)(2, 3 & 4), 42 CFR 438.240(c) and (4), SMM 2091.7	Quality assessment and performance improvement program.	(1) Describe your plan for quality assessment and a performance improvement program that will assess the implementation of substance use disorder treatment services that meets the standards in the attached contracts. Include the quality structure and planned measurements and activities. (2) Provide a plan to correct any deficiencies identified. (3) Provide the name of the quality manager.	VIII. Quality Assurance Plan	
49	42 CFR 438.242(b)(1, 2 & 3)	Health information systems.		XIII. Behavioral Health Data Consolidation Project Plan	

Attestation Signature:______Date:_____

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1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
50	42 CFR 438.228,42 CFR 438.402(a),42 CFR 438.400(b), 42 CFR 438.406(a)	Grievance system - general requirements.	Provide a comprehensive assessment of your current compliance with all State and Federal Grievance System requirements, regulatory and contractual. For any deficiencies identified, provide a detailed work plan to correct the deficiencies to be completed no later than April 1, 2016.	X. Grievance System Plan	
50	42 CFR 431.201, 42 CFR 438.400(b), 42 CFR 438.52(b)(2)(ii), 42 CFR 438.56(f)(2)	Grievance system - action.	Answer as part of the response to the requirement with the description: Grievance system - general requirements. Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
52	42 CFR 431.201	Grievance system - service authorization.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
52	42 CFR 438.210(b)(3)	Grievance system - service authorization process.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
	42 CFR 438.210(c), 42 CFR 431.200(b), 42 CFR 431.206, 42 CFR 438.404(a, b & c), 42 CFR 438.10(c & d)	Grievance system - notice of action.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
55	42 CFR 438.404(c), 42 CFR 431.211, 42	Grievance system - notice of action - timeframes - termination, suspension or reduction of services.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
56	42 CFR 438.404(c)(2)	Grievance system - notice of action - timeframes - denial of payment.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	

	А	В	С	D	Е
1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
57	42 CFR 438.210(c), 42 CFR 438.210(d)(1), 42 CFR 438.404(c)(3 & 4)	Grievance system - notice of action - timeframes - denial of standard authorization.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
58	42 CFR 438.210(d)(2), 42 CFR 438.404(c)(6)	Grievance system - notice of action - timeframes - denial of expedited authorization.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
59	42 CFR 438.404(c)(5)	Grievance system - notice of action - timeframes - untimely authorization.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
60	42 CFR 438.41442 CFR 438.10(g)(1)	Grievance system - information to providers and subcontractors.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
61	42 CFR 438.416	Grievance system - record keeping and reporting.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
62	42 CFR 438.400(b)	Grievance system - appeal.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
	42 CFR 438.402(b)(1)	Grievance system - authority to file.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
	42 CFR 438.402(b)(2)	Grievance system - timing.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	

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1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
CE	42 CFR 438.402(b)(3)(ii), 42 CFR 438.406(b)	procedures.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
65	42 CFR 438.408(a), 42 CFR 438.408(b)(2), 42 CFR 438.408(c)	resolution and notification.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
66	42 CFR	format and content of resolution	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
	42 CFR 438.420(b, c, & d), 42 CFR 438.402(b)(2), 42 CFR 438.404(c)(1), 42 CFR 431.230(b)	hearing process - continuation of	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
69		hearing process - effectuation when	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
	42 CFR 438.424(b)	hearing process - effectuation when	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
70	42 CFR 438.410(a)	process – general.	Answer as part of the response to the requirement with the description: Grievance system - general requirements. Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	

	А	В	С	D	E
1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
	42 CFR 438.402(b)(3)(ii)	Grievance system - expedited appeals process – authority to file.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
73	42 CFR 438.406(b)(2)	Grievance system - expedited appeals process – procedures.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
	42 CFR 438.408(a)42 CFR 438.408(b)(3)42 CFR 438.408(c), 42 CFR 438.408(d)(2)(ii)	Grievance system - expedited appeal process - resolution and notification.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
_	42 CFR 438.410(b)	Grievance system - expedited appeal process - punitive action.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
	42 CFR 431.200(b) 42 CFR 431.220(5)42 CFR 438.41442 CFR 438.10(g)(1)	Grievance system - state fair hearing process - notification of state procedures.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
	42 CFR 438.408(f)(2)	Grievance system - state fair hearing - parties.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	
78	42 CFR 438.400	Grievance system - grievance - definition.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	X. Grievance System Plan	

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1	Authority	Description	Responses to be Addressed in Detailed Plan	Plan Area	Review Team
		Grievance system - grievance process - procedures and authority to file.	Answer as part of the response to the requirement with the description: <u>Grievance</u> system - general requirements. Provide a specific reference here to where this specific	X. Grievance System Plan	
	CFR		requirement is addressed in your response.		
79	438.402(b)(1)(i), 42 CFR 438.402(b)(3)(i)				
	` ''	Grievance system - grievance process - disposition and notification.	Answer as part of the response to the requirement with the description: <u>Grievance</u> <u>system - general requirements.</u> Provide a specific reference here to where this specific	X. Grievance System Plan	
	438.408(b)(1), 42 CFR 438.408(d)(1)		requirement is addressed in your response.		
80	Ci ii +50.+00(u)(1)				

Review Matrix Location	Review Team	Plan Area
		II. Transition and Coordination of Services Plan i. Before implementation ii. After implementation

	Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	RCW 43.20A	DEPARTMENT OF SOCIAL AND HEALTH SERVICES			
4	RCW 43.20A.895	Adult Behavioral Health System - Improvement Strategy	Address the requirements of these provisions. Specifically, describe how you will address performance improvement in compliance with the PIHP Contract for those measures included in that contract.	unmet	Please provide more detail regarding how this will be done. What is the process for review, goal setting and implementation of the goals called out in the contract. Are there specific systems in place and what resources will be used?
5	RCW 43.20A.896	- access to chemical	Describe how you will comply with the requirement to offer contracts to managed health care systems or primary care practice settings to promote access to the services of chemical dependency professionals and mental health professionals for the purposes of integrating such services into primary care settings for individuals with behavioral health and medical comorbidities. Provide a list of existing contracting arrangements and a description of planned efforts to promote clinical integration.	unmet	Please address any arrangements, plans or work related to mental health service integration in primary care settings, or efforts to promote these integrations beyond a contracted relationship.
	RCW 71.05	MENTAL ILLNESS			
	RCW 71.05.365	(Effective July 1, 2018.)	Describe your current process for discharge planning and describe how you would propose transitioning that process to meet the requirement to work with the hospital to develop an individualized discharge plan and arrange for a transition to the community in accordance with the person's individualized discharge plan within twenty-one days of the determination by July 1, 2018.		

RCW 71.24 COMMUNITY MENTAL HEALTH SERVICES ACT

RCW 71.24.845	- Transfers between organizations.	Discuss how your transfer process to ensure a seamless and safe transition in services, including the sharing of information. Discuss how your transfer process will work with a region that is fully integrated and is not managed by a BHO.	met
RCW 71.34	Mental Health Services for Minors		

RCW 71.34	Mental Health Services for Minors		
RCW 71.34.750	Petition for one hundred eighty day commitment - hearing - requirements - findings by court - commitment order - release - successive commitments.	- (1) Describe how you coordinate with the CLIP administration. (2) Describe the process for identifying alternatives to commitment.	met
RCW 71.34.780	Minor's failure to adhere to outpatient conditions - deterioration of minor's functioning - transport to inpatient facility - order of apprehension and detention - revocation of alternative treatment or conditional release - hearings.	Describe how you will coordinate, assess and monitor intensive community services and coordinate with inpatient/residential resources.	met
42 CFR 438.208(b)(1, 2, & 3)	Primary care and coordination of health care services.	Fully describe how you will coordinate services with the health care system in compliance with this provision, the PIHP contract and good practice. Provide agreements, proposed agreements and policies and procedures.	met

Review Matrix Location	Plan Area	Review Team			
Testes matrix Escation	III. Communications and Stakeholder Plan i. Consumers ii. Providers iii. Advisory Board iv. Stakeholders v. Staff	Nevicu (cum			
	Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	RCW 70.96	ALCOHOLISM			
	RCW 70.96A.300	Counties may create alcoholism and other drug addiction board - generally.	Address advisory board membership in compliance with Exhibit F, BHO Advisory Board Membership.	met	
	RCW 71.24	COMMUNITY MENTAL HEALTH SERVICES ACT			
	RCW 71.24.015(2)	Legislative intent and policy.	Describe how you will involve persons with lived behavioral health experience, their families and advocates in designing and implementing behavioral health services in compliance with this section.	met	
		FEDERAL REGULATIONS			
	42 CFR 422.208, 42 CFR 422.210, 42 CFR 431.230, 42 CFR 438(10)(f), 42 CFR 438.10(f)(3), 42 CFR 438.10(f)(6), SMD Letter 01/21/98, 42 CFR 438.10(f)(6)(iv), 42 CFR 438.10(g)(1), 42 CFR 438.10(h), 42 CFR 438.102(c), 42 CFR 400 - 424, 42 CFR 438.6(h), 42 CFR 438.6(i)(1&2), 42 CFR 489.102(a), State Medicaid Manual (SMM) 2900, SMM 2902.2	Information requirements - enrollees.	Describe how you will notify and provide information regarding changes from BHO Integration to enrollees, providers and allied systems with whom you coordinate care.	met	

Review Matrix Location	Plan Area	Review Team
	IV. Network Analysis	
	and Development Plan	
	i. Mental Health	
	ii. Substance Use	
	Disorder	

	Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	RCW 70.96	ALCOHOLISM			
19	RCW 70.96A.080	Comprehensive program of treatment.	(1) Describe your system of care for substance use disorder treatment. Include specifically how it will include a full continuum of care, in accordance with ASAM levels of care as described in the PIHP Draft Contract, that includes withdrawal management, residential treatment and outpatient treatment for youth, pregnant and parenting women, and adults. (2) Describe how you will fund the services and incorporate and coordinate with public and private resources. (3) Describe how you will address emerging substance use disorder challenges, such as new trends in opiate, methamphetamine or marijuana use adn treatment. (3) Describe your involuntary commitment program. (4) Describe your use of Medication Assisted Treatment therapies. (5) Provide a comprehensive assessment of evidence based, research based and promising practices both currently provided and planned to address substance use disorder treatment. Separate the these by youth, adult and older adult.		Please address how SUD residential treatment needs for Youth and PPW populations will be met.
25	RCW 70.96A.110	Voluntary treatment of individuals with a substance use disorder.	Describe how you will document compliance with these requirements by any organization directly providing services to clients.	unmet	Please review and address the process by which individuals will access treatment when seeking it of their own at provider agencies.
	RCW 70.96A.140	Involuntary commitment.	Describe your program for involuntary commitment, including all agreements and arrangements in-place or planned with all entities with a required role in the involuntary commitment process.	met	

RCW 70.96A.142	Evaluation by designated chemical dependency specialist - when required - required notifications.	Describe how you will assure that required evaluations and notifications are performed. Include all agreements and arrangements in-place or planned with all entities with shared responsibility for administration, i.e., CDPs, jails, courts, and Department of Corrections.	met
RCW 70.96A.410	Opiate substitution treatment - program	Describe your use of Medication Assited Treatment Therapies.	met

FEDERAL REGULATIONS

department, department duties - definition of opiate substitution treatment.

42 CFR 438.206(b)(1)

Delivery network.

certification by

- 1. Provide a detailed analysis of your delivery network that demonstrates that the network:
- a. Is or will be supported by written agreements.
- b. Is sufficient to provide adequate access to all services covered under the contracts, and, if it is not sufficient, provides a plan to correct the deficiency. Consider the time and distance standards in the draft PIHP contract attached.

unmet

- c. Considers anticipated Medicaid enrollment, expected utilization, provider requirements (number and type), provider capacity, and location and physical access to providers. Include how language and cultural considerations will be addressed.
- d. Includes providers who can meet the needs of pregnant women, as identified in the contracts as a special healthcare need, with a Substance Use Disorder diagnosis. .
- e. Includes providers who can address the needs of individuals who have either been referred through the Department of Corrections, Drug Courts or identified through activities funded by the Criminal Justice Treatment Account.
- 2. Provide a list of contracted or anticipated contracted providers and the services they will provide, based on the state plan modalities and state funded priority services as described in the draft contracts and supplemental SUD Service descriptions.
- 3. Describe the documentation and provide a sample format that you would be prepared to submit to DSHS on a periodic basis to demonstrate the sufficiency of your network.

(1) Network does not include SUD Residential Treatment. Provide additional information on how this level of care will be provided to meet enrollees medical necessity including PPW and youth. (2) No resource for youth and PPW (3) Please provide a sample format

273

42 CFR 438.207(b & c)	Documentation of adequate capacity and services.	Describe the documentation that you would be prepared to submit to DSHS on a periodic basis to demonstrate the sufficiency of your network.	met
42 CFR 438.12(a)(2), 42 CFR 438.214	Contracts with providers.	Provide a list of contracted or anticipated contracted providers and the services they will provide.	met

Review Matrix Location	Plan Area V. Staffing and Workforce Analysis and Development Plan i. Training ii. Personnel iii. Ombuds	Review Team			
	Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	RCW 70.96	ALCOHOLISM			
	RCW 70.96A.120	Treatment program and facilities - admissions - peace officer duties - protective custody.	Describe how you will assure compliance with the requirements.	met	
	RCW 71.24	COMMUNITY MENTAL HEALTH SERVICES ACT			
	RCW 71.24.350	Mental health ombuds office.	Describe plans to provide behavioral health ombuds services, that will meet the needs of those who access both the mental health and substance	met	

use disorder treatment services.

Review Matrix Location	Plan Area	Review Team			
	VIII Ethania della mal				
	VI. Financial and Administrative Plan				
	Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Crite
	RCW 70.96	ALCOHOLISM			
	RCW 70.96A.180	Payment for treatment - Financial ability of patients.	Describe how will you administer patient financial responsibility for non-Medicaid services	met	
	RCW 71.24	COMMUNITY MENTAL HEALTH SERVICES ACT			
	RCW 71.24.100	Joint agreements of county authorities - required provisions.	If the proposed Behavioral Health Organization involves more than one county, provide a copy of the required agreement that meets the requirements of this section.	met	
	RCW 71.24.110	Joint agreements of county authorities - permissive provisions.	If the proposed Behavioral Health Organization involves more than one county, provide a copy of the required agreement that addresses this section.	met	
	RCW 71.24.340	Behavioral health organizations - agreements with city and county jails.	Provide copies of any agreements with jails or plans for agreements with jails.	met	

Review Matrix Location	Plan Area	Review Team			
	VII. Utilization Management Plan				
	Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	RCW 70.96	ALCOHOLISM			
	RCW 70.96A.097	Review of admission and inpatient treatment of minors - determination of medical necessity - department review - minor declines necessary treatment - at- risk youth petition - costs - public funds.	How will you assure an independent review occurs for minors admitted under the provisions of 70.96A.245 that meets these requirements? This requirement will be delegated to the BHO by the Department.	met	
24	RCW 70.96A.100	Acceptance for approved treatment.	Describe your utilization management system and how you will ensure substance use disorder treatment services are provided to Medicaid enrollees for whom they are medically necessary. Include a process for determining when and how much treatment is offered for other non-Medicaid populations based on the state's priorities. Describe how will you address-emerging substance use disorder challenges, such as new trends in opiate, methamphetamine or marijuana use and treatment.		Please provide additional information regarding how withdrawal management will be provided and if the priority poplulations described are to be provided regardless of Medicaid status. The only one called out as being served regardless of status were males using IVDs.
		FEDERAL REGULATIONS			
	42 CFR 438.206(b)(3)	Second opinion.	Provide information on how enrollees obtain a second opinion for all behavioral health services.	met	
	42 CFR 438.206)c)((1)(i, ii, iii, iv, v, & vi)	Timely access.	Describe how you will assure and monitor timely access to care. Consider the Access standards in the draft PIHP contract attached for Routine, Urgent and Emergent.	met	
	42 CFR 438.210(b)(1, 2, & 3)	Authorization of services.	Describe your utilization management system and how it will be modified to provide all utilization management activities, including authorization of services, for substance use disorder services.	met	

42 CFR 438.6(I), 42 Subcontractual relationships and CFR 438.230(a), 42 delegation.
CFR 438.230(b)(1, 2, & 3), SMM 2087.4

Provide sample subcontracts and/or delegation agreements. Provide policies and procedures for subcontracting and delegation that address these regulatory requirements and specifically address how subcontracted/delegated entities are evaluated and monitored. Provide the most recent monitoring reports for three entities.

Describe in detail your current and planned subcontracting/delegation activities for substance use disorder treatment services.

Review Matrix Location	Plan Area	Review Team	
	VIII. Quality		
	Assurance Plan		

Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	FEDERAL REGULATIONS			
42 CFR 438.240(a)(1 & 2), 42 CFR 438.240(b)(2, 3 & 4), 42 CFR 438.240(c) and (4), SMM 2091.7	Quality assessment and performance improvement program.	(1) Describe your plan for quality assessment and a performance improvement program that will assess the implementation of substance use disorder treatment services that meets the standards in the attached contracts. Include the quality structure and planned measurements and activities. (2) Provide a plan to correct any deficiencies identified. (3) Provide the name of the quality manager.	1. met 2. met 3. met	

Review Matrix Location	Plan Area	Review Team
	X. Grievance System	

Plan

Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	FEDERAL REGULATIONS			
	Grievance system - general requirements.	Provide a comprehensive assessment of your current compliance with all State and Federal Grievance System requirements, regulatory and contractual. For any deficiencies identified, provide a detailed work plan to correct the deficiencies to be completed no later than April 1, 2016.	met	
42 CFR 431.201, 42 CFR (438.400(b), 42 CFR (438.52(b)(2)(ii), 42 CFR (438.56(f)(2)	Grievance system - action.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met	
	Grievance system - service authorization.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met	
	Grievance system - service authorization process.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met	
42 CFR 438.210(c), 42 CFR 431.200(b), 42 CFR 431.206, 42 CFR 438.404(a, b & c), 42 CFR 438.10(c & d)	•	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met	
CFR 431.211, 42 CFR 431.213, 42 CFR 1	of action - timeframes -	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met	
	Grievance system - notice of action - timeframes - denial of payment.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met	

42 CFR 438.210(c), 42 CFR 438.210(d)(1), 42 CFR 438.404(c)(3 & 4)	Grievance system - notice of action - timeframes - denial of standard authorization.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.210(d)(2), 42 CFR 438.404(c)(6)	Grievance system - notice of action - timeframes - denial of expedited authorization.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.404(c)(5)	Grievance system - notice of action - timeframes - untimely authorization.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.41442 CFR 438.10(g)(1)	Grievance system - information to providers and subcontractors.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.416	Grievance system - record keeping and reporting.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.400(b)	Grievance system - appeal.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.402(b)(1)	Grievance system - authority to file.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.402(b)(2)	Grievance system - timing.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.402(b)(3)(ii), 42 CFR 438.406(b)	Grievance system - appeal process - procedures.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.408(a), 42 CFR 438.408(b)(2), 42 CFR 438.408(c)	Grievance system - appeal process - resolution and notification.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met

42 CFR 438.408(d)(2)(i), 42 CFR 438.408(e)	Grievance system - appeal process - format and content of resolution notice.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.420(b, c, & d), 42 CFR 438.402(b)(2), 42 CFR 438.404(c)(1), 42 CFR 431.230(b)	Grievance system - appeal and state fair hearing process - continuation of benefits.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.424(a)	Grievance system - appeal and state fair hearing process - effectuation when services were not furnished.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.424(b)	Grievance system - appeal and state fair hearing process - effectuation when services were furnished.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.410(a)	Grievance system - expedited appeals process – general.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.402(b)(3)(ii)	Grievance system - expedited appeals process – authority to file.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.406(b)(2)	Grievance system - expedited appeals process – procedures.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.408(a)42 CFR 438.408(b)(3)42 CFR 438.408(c), 42 CFR 438.408(d)(2)(ii)		Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.410(b)	Grievance system - expedited appeal process - punitive action.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements</u> . Provide a specific reference here to where this specific requirement is addressed in your response.	met

42 CFR 431.200(b) 42 CFR 431.220(5)42 CFR 438.41442 CFR 438.10(g)(1)	Grievance system - state fair hearing process - notification of state procedures.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.408(f)(2)	Grievance system - state fair hearing - parties.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.400	Grievance system - grievance - definition.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.402(b)(3)(i), 42 CFR 438.402(b)(1)(i), 42 CFR 438.402(b)(3)(i)	Grievance system - grievance process - procedures and authority to file.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met
42 CFR 438.408(a), 42 CFR 438.408(b)(1), 42 CFR 438.408(d)(1)	Grievance system - grievance process - disposition and notification.	Answer as part of the response to the requirement with the description: <u>Grievance system - general requirements.</u> Provide a specific reference here to where this specific requirement is addressed in your response.	met

Review Matrix Location	Plan Area XI. Tribal Communication and Coordination Plan	Review Team	Pierce		
	Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	RCW 71.24	COMMUNITY MENTAL HEALTH SERVICES ACT			
169	RCW 71.24.300 (1, 2, 3, 4, & 5)	Behavioral health organization - inclusion of tribal authorization - roles and responsibilities.	(1) How will the BHO allow for the inclusion of the tribal authority to be represented as a party to the behavioral health organization?	Met	
			(2) Provide a work plan for the implementation of the American Indian Addendum, Exhibit E to the DPR.(3) Address how you will assure that AI/AN enrollees have equal access to behavioral health services.	Unmet	Need to show a workplan for implementation of the Indian Addendum.
			(4) Describe how you will provide culturally competent services to AI/AN. (5) How will the BHO provide for a continuation and/or transition of this practice to assure access to these services by tribal members?	Met	

provide any written agreements.

(6) Address coordination with Tribal providers and Unmet

Stated that there is a written

agreement. Need to attach written agreement with Puyallup Tribe.

Review Matrix Location	Plan Area	Review Team
	XIII. Behavioral Health Data	
	Consolidation Project Plan	

Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	FEDERAL REGULATIONS			
42 CFR 438.242(a), 42 CFR	Health information	Provide a response to the Behavioral Health Data	met	
438.242(b)(1, 2 & 3)	systems.	Consolidation Requirements, Exhibit A to the		
		Detailed Plan Request.		

Review Matrix Location	Plan Area	Review Team
	Exhibit G: WISE	

	Authority	Description	Responses to be Addressed in Detailed Plan	Requirement Met/Unmet	Readiness Criteria
	RCW 71.24	COMMUNITY MENTAL HEALTH SERVICES ACT			
158	RCW 71.24.055	Children's mental health services - children's access to care standards and benefit package.	Describe your current capacity for WISe services and your planning to have sufficient capacity to provide fully compliant WISe services in accordance with the WISe Manual and the PIHP-Draft Contract. Based on the WISe Capacity Expansion document attached as Exhibit G. As of April 1, 2016, what caseload capacity will the BHO have to provide WISe? What is the plan for the BHO to meet the FY16 June 30, 2016 WISe monthly capacity goal?	(plan VII, pg. 11) UNMET	Please provide additional detail regarding how the BHO will meet the WISe capacity goal.