# **Summary Areas to Review**



# Transforming lives

Salish BHO

|      | Plan Area   | Review Team Assigned | Item Number Assigned    |
|------|---|----------------------|-------------------------|
| I.   | 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  |

| 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              |  |
| <del>IX.</del> — | 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 |  |  |  |
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| 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 -<br>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 |                |  |   |  |             |

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| 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 | 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. Describehow 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   |             |

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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<br>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  |   |   |             |

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| 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 -<br>children's access to care standards and<br>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,<br>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 -<br>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<br>32 | RCW 71.34                          | Mental Health Services for Minors  |   |  |             |

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| 1        | Authority  | Description   | Responses to be Addressed in Detailed Plan  | Plan Area   | Review Team |
| 33       | RCW 71.34.600  | Parent may request determination-<br>whether minor has mental disorder-<br>requiring inpatient treatment – minor-<br>consent not required – duties and-<br>obligations of professional person and-<br>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<br>37 |  | FEDERAL REGULATIONS   |   |   |             |
| 37       | 42 CFR 422.208, 42<br>CFR 422.210, 42<br>CFR 431.230, 42<br>CFR 438.10(f)(3), 42<br>CFR 438.10(f)(6),<br>SMD Letter<br>01/21/98, 42 CFR<br>438.10(f)(6)(iv), 42<br>CFR 438.10(g)(1), 42<br>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 |             |

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| 1  | Authority  | Description              | Responses to be Addressed in Detailed Plan   | Plan Area  | Review Team |
| 39 | 42 CFR<br>438.206(b)(1)                              | Delivery network.        | <ol> <li>Provide a detailed analysis of your delivery network that demonstrates that the network:         <ul> <li>a. Is or will be supported by written agreements.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ul></li></ol> <li>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.</li> <li>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</li> | IV. Network Analysis and Development Plan i. Mental Health ii. Substance Use Disorder              |             |
| 40 | 42 CFR<br>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<br>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<br>438.206)c)((1)(i, ii,<br>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),<br>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<br>438.240(b)(2, 3 &<br>4), 42 CFR<br>438.240(c) and (4),<br>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<br>438.242(b)(1, 2 & 3)   | Health information systems.                             |  | XIII. Behavioral Health Data Consolidation Project<br>Plan   |             |

Attestation Signature:\_\_\_\_\_\_Date:\_\_\_\_\_

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| 50 | 42 CFR 438.228,42<br>CFR 438.402(a),42<br>CFR 438.400(b), 42<br>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<br>CFR 438.400(b), 42<br>CFR 438.52(b)(2)(ii),<br>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<br>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),<br>42 CFR 431.200(b),<br>42 CFR 431.206, 42<br>CFR 438.404(a, b &<br>c), 42 CFR 438.10(c<br>& 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),<br>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<br>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 |             |

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| 57 | 42 CFR 438.210(c),<br>42 CFR<br>438.210(d)(1), 42<br>CFR 438.404(c)(3 &<br>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<br>438.210(d)(2), 42<br>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<br>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<br>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<br>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<br>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<br>438.402(b)(3)(ii), 42<br>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),<br>42 CFR<br>438.408(b)(2), 42<br>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: Grievance system - general requirements. 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,<br>& d), 42 CFR<br>438.402(b)(2), 42<br>CFR 438.404(c)(1),<br>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 |             |

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| 1  | Authority   | Description   | Responses to be Addressed in Detailed Plan  | Plan Area                | Review Team |
|    | 42 CFR<br>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<br>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<br>438.408(a)42 CFR<br>438.408(b)(3)42<br>CFR 438.408(c), 42<br>CFR<br>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)<br>42 CFR<br>431.220(5)42 CFR<br>438.41442 CFR<br>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<br>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 |             |

|    | Α  | В  | С   | D                        | E           |
|----|--|--|---|--------------------------|-------------|
| 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<br>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<br>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  |   |                       |                    |
| 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.   | met                   |                    |
| 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. | met                   |                    |
| RCW 71.05      | MENTAL ILLNESS  |   |                       |                    |
| RCW 71.05.365  | Involuntary commitment -<br>Individualized discharge plan.<br>(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.   | met                   |                    |

71.24 COMMUNITY MENTAL HEALTH SERVICES ACT

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

| 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<br>the health care system in compliance with this<br>provision, the PIHP contract and good practice.<br>Provide agreements, proposed agreements and<br>policies and procedures. | met |

| Review Matrix Location | Plan Area               | Review Team               |   |                       |        |
|------------------------|-------------------------|---------------------------|---|-----------------------|--------|
|                        | III. Communications and |                           |   |                       |        |
|                        | Stakeholder Plan        |                           |   |                       |        |
|                        | i. Consumers            |                           |   |                       |        |
|                        | ii. Providers           |                           |   |                       |        |
|                        | iii. Advisory Board     |                           |   |                       |        |
|                        | iv. Stakeholders        |                           |   |                       |        |
|                        | v. Staff                |                           |   |                       |        |
|                        |                         |                           |   |                       | - "    |
|                        | Authority               | Description               | Responses to be Addressed in Detailed Plan      | Requirement Met/Unmet | Readir |
|                        | RCW 70.96               | ALCOHOLISM                |   |                       |        |
|                        |                         |                           |   |                       |        |
|                        | RCW 70.96A.300          | Counties may create       | Address advisory board membership in compliance | met                   |        |
|                        |                         | alcoholism and other drug | with Exhibit F, BHO Advisory Board Membership.  |                       |        |
|                        |                         |                           |   |                       |        |

addiction board - generally.

| RCW 7 |              | COMMUNITY MENTAL<br>HEALTH SERVICES ACT |   |     |
|-------|--------------|---|---|-----|
| RCW 7 | 71.24.015(2) | , ,                                     | 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 Informatic 422.210, 42 CFR 431.230, 42 enrollees. CFR 438(10)(f), 42 CFR 438.10(f)(3), 42 CFR 438.10(f)(6), SMD Letter 01/21/98, 42 CFR

Information requirements -

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

Describe how you will notify and provide unmet (Line item 245) information regarding changes from BHO Integration to enrollees, providers and allied systems with whom you coordinate care.

Provide further detail regarding how the BHO will communicate with providers and allied systems regarding the change to the BHO model. Identify allied systems and the sectors they represent.

| 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.  Voluntary treatment of individuals with a | 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 | unmet (Line item 19)  | Please address the SUD residential treatment needs of the PPW population and youth residential. (2) Only discussed medicaid please provide coordination with public and private resources |
|    | RCW 70.96A.140 | substance use disorder. Involuntary  | clients.  Describe your program for involuntary commitment, including all  | met                   |   |
|    |                | commitment.  | agreements and arrangements in-place or planned with all entities with a required role in the involuntary commitment process.  |                       |   |

| 29 | 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. | unmet (Line Item 29) | Only mentioned CJTA, please provide a description on jails, courts and DOC. |
|----|----------------|---|--|----------------------|---|
|    | RCW 70.96A.410 | Opiate substitution treatment - program certification by department, department duties - definition of opiate substitution treatment. | Describe your use of Medication Assited Treatment Therapies.   | met                  |   |

FEDERAL REGULATIONS

| 42 CFR 438.206(b)(1) | Delivery network. |
|----------------------|-------------------|
|----------------------|-------------------|

- 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.
- 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.

42 CFR 438.207(b & c)

CFR 438.214

Documentation of adequate capacity and services.

42 CFR 438.12(a)(2), 42 Contracts with providers.

Describe the documentation that you would be prepared to submit to DSHS on a periodic basis to demonstrate the sufficiency of your network.

Provide a list of contracted or anticipated contracted providers and the services they will provide.

1. Need to address PPW residential, youth residential and DOC population in the response. (d,e) 3. Please provide sample format

met

1. met 2. met 3. unmet

(Line item 273)

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   |  |                       |   |
| 175                    | 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 | unmet (Line item 175) | Please specify that the<br>Ombuds needs to be a<br>consumer of behavioral |

use disorder treatment services.

health services.

| Review Matrix Location | Plan Area<br>VI. Financial and | Review Team  |   |                       |                 |
|------------------------|--------------------------------|--|---|-----------------------|-----------------|
|                        | 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 -<br>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   |  |                       |  |
|------------------------|--|---|--|-----------------------|--|
| Neview Matrix Location | VII. Utilization                                     | neview realii   |  |                       |  |
|                        | 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<br>treatment of minors - determination of<br>medical necessity - department review -<br>minor declines necessary treatment - at-<br>risk youth petition - costs - public funds. | This requirement will be delegated to the BHO by   | met                   |  |
|                        | 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 newtrends in opiate, methamphetamine or marijuanause and treatment. | met                   |  |
|                        |  | FEDERAL REGULATIONS   |  |                       |  |
|                        | 42 CFR<br>438.206(b)(3)                              | Second opinion.   | Provide information on how enrollees obtain a second opinion for all behavioral health services.   | met                   |  |
|                        | 42 CFR<br>438.206)c)((1)(i, ii,<br>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                   |  |
| 284                    | 42 CFR<br>438.210(b)(1, 2, &<br>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.  | unmet (Line item 284) | Describe CommCare credentials to authorize/deny care for SUD services. |

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.

unmet (Line item 290) Please provide subcontracts and delegation agreements.

| 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  |   |                       |                                       |
| 292 | 42 CFR<br>438.240(a)(1 & 2)<br>42 CFR<br>438.240(b)(2, 3 &<br>4), 42 CFR<br>438.240(c) and<br>(4), SMM 2091.7 | 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. |                       | 2. Please provide detail of the plan. |

| Review Matrix Location | Plan Area           | Review Team |
|------------------------|---------------------|-------------|
|                        | X. Grievance System |             |

| X. Grie | evance | Systen |
|---------|--------|--------|
| Plan    |        |        |

| Authority  | Description  | Responses to be Addressed in Detailed Plan   | Requirement Met/Unmet | Readiness Criteria |
|--|--|--|-----------------------|--------------------|
|  | FEDERAL REGULATIONS  |  |                       |                    |
| 42 CFR 438.228,42 CFR<br>438.402(a),42 CFR<br>438.400(b), 42 CFR<br>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. | met                   |                    |
| 42 CFR 431.201, 42<br>CFR 438.400(b), 42 CFF<br>438.52(b)(2)(ii), 42 CFF<br>438.56(f)(2)                         |  | 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 431.201   | 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.  | met                   |                    |
| 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.  | met                   |                    |
| 42 CFR 438.210(c), 42<br>CFR 431.200(b), 42 CFF<br>431.206, 42 CFR<br>438.404(a, b & c), 42<br>CFR 438.10(c & d) | Grievance system - 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 438.404(c), 42<br>CFR 431.211, 42 CFR<br>431.213, 42 CFR<br>431.214, 42 CFR<br>483.12(a)(5)(ii)           | 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.  | met                   |                    |
| 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.  | met                   |                    |

| 42 CFR 438.210(c), 42<br>CFR 438.210(d)(1), 42<br>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),<br>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<br>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<br>438.402(b)(3)(ii), 42<br>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<br>CFR 438.408(b)(2), 42<br>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<br>438.408(d)(2)(i), 42<br>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<br>and state fair hearing<br>process - continuation of<br>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<br>and state fair hearing<br>process - effectuation<br>when services were not<br>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<br>and state fair hearing<br>process - effectuation<br>when services were<br>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 -<br>expedited appeals process<br>– 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<br>438.402(b)(3)(ii)   | Grievance system -<br>expedited appeals process<br>– 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 -<br>expedited appeals process<br>– 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<br>CFR 438.408(b)(3)42<br>CFR 438.408(c), 42 CFR<br>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 -<br>expedited appeal process -<br>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<br>CFR 431.220(5)42 CFR<br>438.41442 CFR<br>438.10(g)(1)      | Grievance system - state<br>fair hearing process -<br>notification of state<br>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<br>438.402(b)(3)(i), 42<br>CFR 438.402(b)(1)(i),<br>42 CFR 438.402(b)(3)(i) | Grievance system -<br>grievance process -<br>procedures and authority<br>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<br>CFR 438.408(b)(1), 42<br>CFR 438.408(d)(1)                | Grievance system -<br>grievance process -<br>disposition and<br>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                | Review Team | Peninsula |
|------------------------|--------------------------|-------------|-----------|
|                        | XI. Tribal Communication |             |           |
|                        | and Coordination Plan    |             |           |

|     | 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.   | Unmet (Line item 169) | Need to show a workplan for implementation of the Indian Addendum.                                       |
|     |                                 |  | (3) Address how you will assure that AI/AN enrollees have equal access to behavioral health services.   | Unmet (Line item 169) | Need more clarity on how proposed collection of data will help gain equal access to services for AI/ANs. |
|     |                                 |  | <ul> <li>(4) Describe how you will provide culturally competent services to Al/AN.</li> <li>(5) How will the BHO provide for a continuation and/or transition of this practice to assure access to these services by tribal members?</li> </ul> | Met                   | ·  |
|     |                                 |  | (6) Address coordination with Tribal providers and provide any written agreements.  | Met                   |  |

| 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<br>438.242(b)(1, 2 & 3) | Health information systems. | Provide a response to the Behavioral Health Data<br>Consolidation Requirements, Exhibit A to the<br>Detailed Plan Request. | met                   |                    |

| 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  |   |                       |                    |
| RCW 71.24.055 | Children's mental health<br>services - children's<br>access to care standards<br>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? | (page 21) <b>Met</b>  |                    |