

NORTHPOINTE BEHAVIORAL HEALTHCARE SYSTEMS

Accessibility and Accommodations Plan

Revised: February 2017

The purpose of Northpointe's Accessibility and Accommodations Plan is to promote equal accessibility for all individuals, personnel and other stakeholders and ongoing staff training in the following areas:

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

This plan provides detail to the Accessibility and Accommodations Policy. Individuals, staff, and stakeholders are provided the opportunity to address issues concerning accessibility through many venues, which include during the person-centered planning process, formal surveys conducted throughout the year, using the "Suggestion for Improvement" form, Customer Service Grievance/Complaint form, contacting the Safety/Risk Management Committee, through our Stakeholders Advisory Committee, Member Services Committee, Public Forums, and/or discussion with management/staff of Northpointe Behavioral Healthcare Systems.

1. Limited English Proficiency/Communication Access:

To overcome any communication barriers, Northpointe will demonstrate the ability to identify and respond to a variety of different needs for language accommodations at no cost to the individual. These may include making accommodations for an individual with a hearing or speech loss; an individual with English as a second language or an individual with limited English proficiency. Choices regarding services and providers must be available in understandable and varied formats. Written and/or audio formats of materials will be provided as the need is identified. The individual/employee will have the "primary consideration" of auxiliary aids or services. This means that Northpointe will honor the choice, unless it can demonstrate that another effective means of communication exists or that the use of the means chosen would result in a fundamental alteration or an undue burden ("Fundamental alteration" and "undue burden" as described by Title II, ADA). Individuals may utilize family or friends for translation unless it is determined by the individual's clinician to be contra-indicated to the individual's treatment.

Barriers addressed:

- a. List of language interpreters – a list of language interpreters can be found on Northpointe's electronic Shared document directory (Shared/Access/Access Dept. Guidelines & Procedures/Language Line instructions) and paper copies are available from the Access Department. Northpointe will contract with "Language Line" on a case by case basis, should a local interpreter not be available. In FY17 Northpointe hired a staff that has the ability to interpret Polish therefore increasing our list of interpreters.
- b. Pocket Talkers, page magnifiers, and reading stands are also available for any person needing assistance with hearing or vision and can be obtained from the Customer Service Department
- c. Audiocassettes and DVDs explaining individual's rights and the privacy notice are also available through Northpointe's Access Department.

- d. Northpointe utilizes and advertises the Michigan Relay number (800-649-3777) for people who are hearing impaired and need to call on the telephone.
- e. Northpointe may contract with Virtual VRI for persons who are deaf and need sign language interpretation services. (1-866-440-9140).
- f. Recipient Rights booklets will be obtained in languages other than English, from the MDCH Recipient Rights website, on an as-needed basis.

2. Environmental Access:

External Barriers - Geographic access to supports and services shall be in accordance with the following standards:

- For office or site-based mental health services, the mental health recipient's primary service provider (e.g., case manager/supports coordinator, psychiatrist, and primary therapist) must be within 60 miles or 60 minutes of the recipient's residence
- If an individual with special needs requests transportation, Northpointe will assist in making arrangements with the parties with whom that responsibility is shared such as the Department of Health and Human Services (DHHS) and the Upper Peninsula Health Plan (UPHP)
- Care managers are able to meet with individuals in safe areas in the community.

Barriers Addressed:

Northpointe opened a satellite office in Powers, MI in order to accommodate those individuals who live in the outer areas of Dickinson and Menominee counties who may have had difficulty attending appointments at either of the main sites due to distance and transportation problems.

Northpointe currently has offices and staff located within 60 miles or 60 minutes of all recipients in our three county areas. Discussions have taken place with local DHS and the UPHP regarding transportation responsibilities. Internal barriers are addressed within 30 days of receipt of identified issues. Services are provided as a mutually agreed upon location through the person-centered planning process.

In order to ensure safety of Northpointe care managers who go out into remote areas of the communities, GPS systems are being purchased in FY17 that would allow the user to contact emergency personnel in areas where cell phone coverage is not adequate.

Internal Barriers – Northpointe will strive to keep all service areas in a manner that will respect the privacy and confidentiality of all persons served and includes keeping noise levels down, offices neat and clean, décor that impact the comfort level of the persons served and personnel, etc. Services will also be provided at alternative sites including home visits, as agreed upon during the person-centered planning process. Emergency Services will be conducted in locations with safety and supervision. (i.e. hospitals, jails.)

3. Architectural or Physical Access:

Alteration of existing facilities and/or construction of new facilities. Northpointe will annually conduct evaluations, internally and externally, to identify areas of concern in all programs, facilities and services. An improvement plan to remove obstacles/barriers within 30 days will be implemented for areas identified. Evaluations will include:

- a. Identify physical obstacles that limit program access;
- b. Detail of methods to correct limitation;
- c. Set a schedule for structural changes;
- d. Identify project manager responsible for implementing change.

Barrier: Individual from Menominee submitted a complaint regarding access to the building stating the parking lot was icy.

Future Plan: Menominee site supervisor will review the snow removal contract to determine whether putting salt and/or dirt in the parking lot and on sidewalks is part of the contract. If not, either the contract will be amended or a new contract developed to hire someone to complete these tasks prior to the office opening.

Barrier: The Home and Community Based Services waiver provided new standards that must be implemented by Northpointe residential providers over a five year timespan starting in 2014. These requirements maximize opportunities for individuals to have access to the benefits of community living and the opportunity to receive services in the most integrated setting:

Standards that Northpointe did not already have implemented include:

- Individuals must be allowed access to food 24/7 and not just at scheduled meal times
- Individuals must have the ability to lock their rooms
- Individuals must have a locked storage contained where they can lock up personal belongings
- A choice of settings and an option for a private unit/room.
- Ability to control their schedules and activities
- May have visitors at any time

Barriers being addressed: Northpointe’s Community Housing Supervisor is organizing the changes needed to be in compliance with these regulations. Site reviews by MDHHS for the HCBS waiver will be performed and any further incidents of non-compliance will be discussed with the QI Team and plans of correction put in place.

4. Attitudinal Access:

- Terminology and language used in Northpointe materials is written in “people first” language and will be written at a level that is easily understandable by people with various levels of abilities. Materials will be read to individuals in an easily understandable manner should this be required.
- Northpointe will contribute to solving the problems associated with stereotypical behavioral health stigmas. Aside from personnel efforts to remove such barriers, programs will reinforce the elimination of attitudinal barriers through education and other prevention activities in the community.
- Individual’s input will be solicited and utilized as applicable. Individual’s input is gathered in a variety of ways including: Stakeholder Advisory Committee meetings, Member Services Committee, satisfaction surveys, public forums, focus groups, through the person-centered planning process, customer inquiry/complaint forms. A contact form is available on Northpointe’s website www.nbhs.org which may be utilized for complaints, suggestions or requests for information. Peer Support Specialists may assist individuals at their discretion.
- All complaints or suggestions will be assessed by the Medical Records Manager within seven (7) days of receipt; resolvable suggestions/complaints will be completed within 30 days of receipt. If the individual or other stakeholder contributing the suggestion/complaint provides their name, the Medical Records Manager will inform them of the outcome of their suggestion/complaint within sixty (60) days.

5. Employment Access:

Northpointe will adhere to policies as listed in Northpointe’s Administrative Policies, Human Resources Section, Equal Opportunity and Employee Selection. Accommodations for special needs will be addressed on a “case by case” basis in accordance with the Michigan Handicappers Civil

Rights Act, Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act (ADA). Northpointe will also promote and enable individuals to pursue their employment desires through the person-centered planning process. Employment opportunities will be made available to all eligible individuals by posting all job openings on Northpointe's website.

6. Financial Access:

Northpointe complies with the ability to pay standards mandated by the Michigan Department of Health and Human Services. The intake information given to individuals will address the ability to pay scales based on income guideline along with the insurances and prepaid health plan (Medicaid) entitlements.

Barriers Addressed:

Financial forms are completed at least annually in order to keep current information on file. Individuals are also assisted with completing necessary forms/applications for benefits when the need is identified. NBHS allow individuals who are experiencing financial hardship the opportunity to complete a financial re-determination, which may result in reduced fees. The financial re-determination form is offered by Customer Service on the day that a fee is assessed or at any time when an individual expresses financial concern regarding their assessed fee. Northpointe clinical staff and Peer Supports Specialist have assisted individuals in navigating the system and signing up for Healthy Michigan Insurance.

7. Transportation Access:

The Northpointe Behavioral Healthcare Systems program sites are located in areas that are centrally located for the individuals receiving services. The catchment areas are very rural and arrangements for transportation are facilitated through natural supports, Department of Health and Human Services (DHHS), Upper Peninsula Health Plan (UPHP), and Northpointe as appropriate.

The need for transportation options has been communicated to local governments for community needs assessment and direction to meet these needs.

Barrier: The cost of transporting an individual in need of hospitalization is often a barrier to treatment. Many of the hospitals that accept psychiatric admissions are anywhere from 2-10 hours away from the Northpointe locations and the cost of transportation for individuals and family members may prevent them from getting the help they need.

Barrier Being Addressed: A grant is being submitted to assist individuals with the cost of transportation when a hospitalization is required.

Update: this grant was obtained and is currently being utilized by Northpointe's Emergency Services Manager to assist in alleviating the cost associated with transportation to/from inpatient psychiatric facilities.

8. Additional Access:

Crisis services are provided to anyone in need 24 hours a day 7 days a week by trained professionals.

Barrier: It was determined that clinical staff who are licensed in Michigan were not legally allowed to provide services to individuals in Marinette at Bay Area Medical Center or at The Anthony House, as it is outside their scope of licensure which does not cover Wisconsin.

Barrier Being addressed: a new procedure was implemented where an individual in need of behavioral crisis services who present at the Bay Area Medical Center after hours will be screened by ADAPT. The Crisis Line is encouraging individuals having a behavioral crisis to present to the Menominee police or Sheriff's Departments where they can then be seen by Northpointe staff. If the Northpointe crisis worker determines that an individual needs inpatient hospitalization, they will go

to Bay Area Medical Center for medical clearance.

Follow up services for individuals placed at Anthony House will occur in a Michigan location.

Barrier: There has been a continued decline in psychiatric beds available for inpatient psychiatric hospitalization, therefore causing lengthy waits in emergency rooms trying to locate an available bed and sometimes causing the crisis worker to create an alternative crisis/safety plan because there are no beds available.

Barrier Being addressed: Northpointe is working on obtaining a contract with a hospital in Green Bay, WI to give us more beds and options for hospitalizing individuals. This will include beds for both Adults and Children.

9. **Community Integration:**

Northpointe strives to make the most of community opportunities for our individuals. Participation in recreation and sporting activities improves the quality of life for individuals as well as providing first hand anti-stigma information to the community.

Individuals are encouraged to utilize swimming facilities, bowling alleys, attend and participate in sporting events and community gatherings. The community has recognized the need to make places more accommodating to all individuals and items such as a wheelchair ramp at the local Bocce Ball court was built (labor and materials were donated) so our individuals could participate more fully in this activity.

- Northpointe Care Managers/Supports Coordinators continue to promote least restrictive residential placements through the process of Person-Centered Planning and Self-Determination initiatives.
- Northpointe Care Managers/Supports Coordinators strive to conduct future planning when relevant for a proactive approach in fostering placements in community-based settings.
- Through contracts with local vocational employment agencies, Northpointe continues to foster connections in the community to work with potential employers for job placement for individuals with disabilities

10. **Timeliness of Services** – Northpointe reports and monitors access standards on at least a quarterly basis. If a concern regarding the timeliness of access to service is noted for two consecutive quarters, Northpointe will discuss this at the next scheduled monthly Quality Improvement meeting and a Plan of Correction will be put in place within thirty (30) days. Northpointe met this standard at 100% each quarter for every population in FY16.

11. **Accommodations:** Requests for reasonable accommodations are identified, reviewed and decided upon in a timely manner. A reasonable accommodation is a modification or adjustment that would assist the individuals served or personnel to access benefits and privileges that are equal to those enjoyed by others. The process of making a request for a reasonable accommodation does not automatically require that Northpointe meet the request. A request for a reasonable accommodation initiates an investigation by the appropriate program supervisor and/or facilities manager within thirty (30) days and a resolution to the request within sixty (60) days, whenever possible. When an accommodation cannot be made, Northpointe will provide referrals to assist the individuals served in the use of other resources that are accessible.

Summary:

Northpointe will address any accessibility and accommodation issues in order to:

- ✓ Enhance the quality of life for those served in our programs/services;
- ✓ Maintain nondiscriminatory employment practices;
- ✓ Meet legal and regulatory requirements;
- ✓ Meet the expectations of stakeholders in the areas of accessibility and accommodation.

Identified barriers will be discussed at appropriate Northpointe committee meetings.

Stakeholder Advisory Committee Reviewed: 2/7/17

QI Team reviewed and approved: 2/9/17

Board reviewed and approved: 3/27/17