



Section: Customer Services	Policy Name: Customer Education, Marketing, & Orientation	Policy Number: 06.07
Owner: Customer Services Manager	Reviewed By: Sarah Ameter	Total Pages: 4
Required By: <input checked="" type="checkbox"/> BBA <input checked="" type="checkbox"/> MDHHS <input type="checkbox"/> NCQA <input checked="" type="checkbox"/> Other (please specify): <u>ACA 1557</u>	Final Approval By: <i>Sarah Ameter</i>	Date Approved: Jul 26, 2021
Application: <input checked="" type="checkbox"/> SWMBH Staff/Ops <input checked="" type="checkbox"/> Participant CMHSPs <input checked="" type="checkbox"/> SUD Providers <input checked="" type="checkbox"/> MH/IDD Providers <input type="checkbox"/> Other (please specify): _____	Line of Business: <input checked="" type="checkbox"/> Medicaid <input type="checkbox"/> Other (please specify): <input checked="" type="checkbox"/> Healthy Michigan _____ <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> SUD Medicaid <input type="checkbox"/> MI Health Link	Effective Date: 4/1/21

Policy: Southwest Michigan Behavioral Health (SWMBH) will implement methods and safeguards to assure marketing, informational and educational materials are accurate and do not mislead, confuse, or defraud customers of the region.

Purpose: To ensure informational/educational materials (written brochures and flyers that detail what the Prepaid Inpatient Health Plan (PIHP) can do and how to access services, including the Customer Handbook) and general communication provided to customers is accurate.

Scope: Customer Services

Responsibilities: SWMBH and all contracted providers shall ensure that all members are provided language assistance when accessing and receiving services.

Definitions:

- A. Limited English Proficiency (LEP): Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English may be LEP and may be eligible to receive language assistance for a particular type of service, benefit, or encounter.

Standards and Guidelines:

- A. SWMBH will implement safeguards to ensure that all customer marketing, informational and other general communications material accurately and clearly represent the activities/services provided by SWMBH and delegated entities.
 1. All materials distributed to customers by delegated entities will be reviewed by SWMBH during the annual site review process.



2. All marketing, informational and communication material will accurately represent:
 - a. Benefit plans
 - b. Participating Provider availability and accessibility
 - c. Plan coverage, including any exclusions and limitations
 - d. Administrative requirements
 - e. Medical management requirements
 3. Materials that are routinely created by a SWMBH department (for example newsletters) will be reviewed by the functional area leader for accuracy and other senior SWMBH staff as deemed necessary by that functional area leader. These materials will not be reviewed by any SWMBH committee unless the functional area leader determines this is appropriate. All newsletters will go through appropriate safeguards at the department level to determine that all marketing standards are met.
 4. Marketing, informational, and communication materials intended to be distributed to customers or potential customers will be reviewed by the appropriate standing SWMBH committee. Determination of the clarity and accuracy of the materials will be documented in the committee minutes.
 5. If the materials are determined to be clear and accurate by the appropriate SWMBH committee, the materials will then be reviewed by the Customer Advisory Committee (CAC). Determination of the clarity and accuracy of the materials by the CAC will be documented in the minutes.
 6. If the materials are determined to be clear and accurate by the CAC, the materials will then be printed and distributed to appropriate outlets.
 7. If materials are not approved either by the SWMBH committee or the CAC, the reasons for denial will be documented and correction will be implemented. If the materials are corrected based on feedback from the committee/CAC, the materials will be reviewed again by the SWMBH committee as well as the CAC for approval prior to distribution.
- B. SWMBH will ensure all written materials provided to service applicants and customers will be written in plain language so that they may be understandable to those persons.
1. Plain language will be used by staff when interfacing directly with or in written materials, when possible, to ensure health literacy.
 2. Customer documents will strive for a 6.9 grade reading level.
 3. All member materials will meet LEP Policy requirements.
- C. Materials will be available in alternate formats to meet the Limited English Proficiency (LEP), cultural and linguistic needs of the SWMBH region in compliance with the guidelines, regulations, and/or contractual requirements outlined in SWMBH's Limited English Proficiency Policy.
- D. SWMBH Customer Services staff will maintain documentation of all SWMBH approved and distributed material for monitoring and tracking of the material.
1. Customer Services will review the material at least annually to monitor all approved existing materials for accuracy.
 2. If the materials become outdated, otherwise misrepresent SWMBH or delegate services, or other problems with the material are detected, Customer Services will take immediate action to correct or rescind the material as needed.



References:

- A. MDHHS/PIHP Contract: General Requirements (M2) Written Materials
- B. Medicaid Managed Care Regulations: 42 CFR 438.10 and 42 CFR 438.104
- C. Office of Civil Rights, Patient Protection and Affordable Care Act: Section 1557
- D. SWMBH Policy: Limited English Proficiency

Attachments: None






06.07 Customer Education Marketing Orientation

Final Audit Report

2021-07-26

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