



Section: Customer Services	Policy Name: Medicare Member Education & Marketing	Policy Number: MHL 06.06
Owner: Customer Service Manager	Reviewed By: Sarah Ameter	Total Pages: 4
Required By: <input type="checkbox"/> BBA <input type="checkbox"/> MDHHS <input checked="" type="checkbox"/> NCQA <input checked="" type="checkbox"/> Other (please specify): <u>3-Way Contract</u>	Final Approval By: <i>Sarah Ameter</i> Sarah Ameter (Aug 2, 2022 12:28 EDT)	Date Approved: Aug 2, 2022
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 type="checkbox"/> Medicaid <input type="checkbox"/> Other (please specify): _____ <input type="checkbox"/> Healthy Michigan <input type="checkbox"/> SUD Block Grant <input type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> MI Health Link	Effective Date: 8/26/2015

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. Whenever applicable, SWMBH will utilize materials in a fashion to meet and/or exceed standards and guidelines set within federal, state, accreditation, business line, and funding source regulations.

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 Member Handbook) and general communications provided to members are accurate and complete.

Scope: Member Services

Responsibilities: SWMBH Member Services department shall ensure compliance with the standards and guidelines outlined in this policy and guiding documents.

Definitions: None

Standards and Guidelines:

A. SWMBH will implement safeguards to ensure that all member marketing, informational and other general communications material accurately and clearly represent the activities/services provided by SWMBH and SWMBH’s provider network.

1. 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
2. Written information will be offered to members upon enrollment and annually thereafter regarding, including, but not limited to:
 - a. Member Rights and Responsibilities
 - b. Benefits and services including in, and excluded from, coverage
 - c. Copayments and other charges for which members are responsible
 - d. Benefit restrictions that apply to services obtained outside SWMBH's system or service area.
 - e. How to obtain language assistance.
 - f. How to obtain information about practitioners who participate in SWMBH's provider network.
 - g. How to obtain inpatient and outpatient services, partial hospitalizations and other behavioral healthcare services.
 - h. How to obtain subspecialty care.
 - i. How to obtain care after normal business hours.
 - j. How to obtain emergency care, including SWMBH's policy on when to directly access emergency care or use 911 services.
 - k. How to obtain care and coverage when members are out of the organization's service area.
 - l. How to submit a complaint or grievance.
 - m. How to appeal a decision that adversely affects coverage, benefits or a member's relationship with SWMBH.
 - n. Availability of independent, external review of internal UM final determinations.
 - o. Information about Advance Directives.
 - p. How to change providers.
 - q. How to disenroll voluntarily.
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.
 - a. Marketing, informational and communication materials intended to be distributed to members or potential members 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.
 - b. 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.
 - c. If the materials are determined to be clear and accurate by the CAC, the materials will then be printed and distributed to appropriate outlets.



d. 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. All member materials will be reviewed for the use of plain language

1. Plain language will be used by staff when interfacing directly with or in written materials, when possible, to ensure health literacy.
2. Member documents will strive for a 6th grade reading level when possible.

C. Materials will be available in alternate formats to meet the limited English proficiency (LEP), cultural and linguistic needs of the service region, in compliance with the guidelines, regulations and/or contractual requirements as outlined in SWMBH MI Health Link (MHL) Policy 06.04: Medicare Limited English Proficiency.

D. SWMBH's Member Services staff will maintain documentation of all approved and distributed material for monitoring and tracking of the material. Member Services staff will review the material at least annually to monitor all approved existing materials for accuracy. If the materials become outdated, otherwise misrepresent SWMBH or delegate services, or other problems with the material are detected, Member Services staff will take immediate action to correct or rescind the material as needed.

References:

- A. NCQA Standard: RR1 Statement of Member's Rights and Responsibilities; RR3: Subscriber Information; RR4 Practitioner and Provider Directories
- B. MI Health Link 3-Way Contract: Section 2.14.4.1
- C. SWMBH MHL Policy 06.04: Medicare Limited English Proficiency

Attachments: None

Revision History

Revision #	Revision Date	Revision Location	Revision Summary	Revisor
1	8/26/15	SWMBH		
2	6/5/17	SWMBH		
3	1/1/20	References, Standards and Guidelines: A2n-p, C, E	Updated	Heather Woods
4	8/20/21	Annual Review	Annual Review	Heather Woods
5	7/15/22	Annual Review	No Changes	Heather Woods






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Final Audit Report

2022-08-02

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