

SWMBH Operating Policy 6.7

Subject: Customer Education, Marketing, and Orientation		Accountability: Customer Services	Effective Date: 1/1/2014	Pages: 3
REQUIRED BY: BBA Section <u>42 CFR 438.10, 42 CFR 438.104</u> PIHP Contract Section <u>FY17, Section 6.3.2, Information Requirements</u> NCQA/URAC Standard _____ Other <u>ACA 1557</u>		Last Reviewed Date: 1/10/17	Past Reviewed Dates: 1/1/15	
LINE OF BUSINESS: <input checked="" type="checkbox"/> Specialty Waiver (B/C) <input checked="" type="checkbox"/> 1115 Waiver <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> MI Health Link <input type="checkbox"/> Other: _____	APPLICATION: <input checked="" type="checkbox"/> SWMBH Staff and Ops <input checked="" type="checkbox"/> Participant CMHSPs <input checked="" type="checkbox"/> SUD Providers <input checked="" type="checkbox"/> MH / DD providers <input type="checkbox"/> Other: _____	Last Revised Date: 1/10/17	Past Revised Dates: 4/24/15 1/1/15	
Approved : <u><i>Kim Kessler</i></u> Date: <u>1.24.17</u>		Required Reviewer: Director of UM and ME		

I. 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.

II. 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.

III. 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

SWMBH Operating Policy 6.7

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. All customer materials will be reviewed for 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. 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. All such materials shall be written at the 4th grade reading level when possible (i.e., in some situations it is necessary to include medications, diagnosis and conditions that do not meet the 4th grade level criteria).
 - a. SWMBH will ensure that accommodations are provided to assist with understanding of materials for individuals with special needs or impairments.
 - b. For persons who are not able to read, arrangements will be made to ensure that materials are read to, and/or explained to them in terms they may understand. Auxiliary aids and services must also be made available upon request at no cost.
 - c. All materials shall be available in alternative formats in accordance with the Americans with Disabilities Act (ADA). Beneficiaries shall be informed of how to access the alternative formats.
 - d. Material shall not contain false, confusing, and/or misleading information.
 - e. Written materials must include taglines in the prevalent non-English languages in the state, as well as large print, explaining the availability of written translation or oral interpretation to understand the information provided and the toll-free and teletypewriter (TTY) or Telecommunication Device for the Deaf (TDD) telephone number of SWMBH's member/customer service unit. Large print means printed in a font size no smaller than 18 point.
- C. Materials will be available in alternate formats to meet the Limited English Proficiency (LEP), cultural and linguistic needs of the service region according to SWMBH Operating Policy 6.5
- D. SWMBH Customer Services Coordinator will maintain documentation of all SWMBH approved and distributed material for monitoring and tracking of the material.
1. The Customer Services Coordinator 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, the Customer Services

SWMBH Operating Policy 6.7

Coordinator will take immediate action to correct or rescind the material as needed.

IV. Definitions

None

V. References

42 CFR 438.10

42 CFR 438.104

Office of Civil Rights – ACA 1557

VI. Attachments

None

