

## QUALITY MANAGEMENT

**Purpose:** This procedure describes the key responsibilities of the grievance officer, the security officer(s), and the quality manager; outlines Northwest Educational Service District 189 (NWESD 189) compliance with 42 CFR 438, Chapter [388-877-0320 WAC](#), Chapter [388-877-410 WAC](#), North Sound Mental Health Administration (NSMHA) Polices [#1547](#), [#1553](#), [#4015](#), [#4202](#), [#4205](#), [#5501](#), and [#5504](#); and, establishes functional responsibilities for the grievance officer, the quality manager, and the security officer(s).

**Grievance officer responsibilities:** The NWESD 189 Assistant Superintendent of Operations is assigned the responsibilities of grievance officer for the Behavioral Health Program and is responsible for the day-to-day operations of the grievance system. Specifically, the grievance officer will

- 1) Recommend policies, procedures, and processes to ensure grievances are resolved in a timely manner and at the lowest level possible.
- 2) Develop and implement trainings to behavioral health and quality management staff on the NWESD 189 grievance system.
- 3) Represent the NWESD 189 at required NSMHA grievance team meetings.
- 4) Monitor and report changes in relevant laws that may affect the NWESD 189 Behavioral Health Program grievance process.
- 5) Report grievance activity to NSMHA, when appropriate or as required.
- 6) Make use of grievance data to support continuous improvement activities.

**Security officers' responsibilities:** The Director of Technology Services (TS) and the Director of Evaluation, Planning, and Development (EPD) are assigned the shared responsibilities of security officers and are responsible for the day-to-day operations of the security program, with the TS Director primarily responsible for technology systems security and the EPD Director primarily responsible for non-technology systems security. Through collaborative strategies, this includes

- 1) Recommendation of policies and procedures to ensure protected health information (PHI) is secure and breaches, if any, are identified and reported.
- 2) Administration of internal audits of technology systems, including the development of any prerequisite tools.
- 3) Submission of audit finding reports to the Superintendent with recommended corrective actions, when appropriate.

- 4) Coordination of ongoing training and awareness of *Health Insurance Portability and Accountability Act (HIPAA)* and *Family Educational Rights and Privacy Act (FERPA)* requirements.

**Quality manager responsibilities:** The NWESD 189 Director of Evaluation, Planning, and Development is assigned quality manager responsibilities for the day-to-day operations of Coordinated Quality Improvement and Compliance: Behavioral Health (CQIC: BH) Program services. Specifically, the quality manager will

- 1) Provide ongoing Behavioral Health Program monitoring, assessment, and support, including
  - A) identification and implementation of program evaluation best practices.
  - B) identification and/or development of assessments/tools.
  - C) collaboration with others to identify/develop appropriate measures of achievement, effectiveness, efficiency, and fidelity.
  - D) development and monitoring of draft data collection tools and program forms.
  - E) development and administration of appropriate data recording/analytic tools.
  - F) development and administration of “crosswalk” behavioral health indicators to other child/youth indicators.
  - G) development and presentation of program data to the Director of Behavioral Health and Prevention Services on a regular basis.
  - H) implementation assistance of corrective actions as requested by the Director of Behavioral Health and Prevention Services.
  - I) development and submission of quarterly and annual reports as required by contracts, grants, and other state and federal requirements.
  - J) representation of the NWESD 189 on local, regional, and state data-quality and evaluation committees.
  - K) participation in weekly meetings with the Director of Behavioral Health and Prevention Services to review current or ongoing issues with an agenda determined on a weekly basis that includes short- and long-term projects/calendars.
  - L) implementation of changes made to NSMHA data dictionary within one hundred ten (110) days from the date of published changes.

- M) accomplishment of all required technical modifications to data within one hundred ten (110) days of written notification from NSMHA.
- 2) Provide ongoing monitoring, assessment, evaluation, and related support of customer service.
  - 3) Provide ongoing monitoring, assessment, evaluation, and related support of cultural competency.
  - 4) Conduct routine utilization reviews in compliance with [NSMHA Policy #5501](#).
  - 5) Perform regular and systematic validations of encounter data, including
    - A) development of reporting forms, recommended procedures, and provision of staff training to support the collection, recording, and transmission of accurate data.
    - B) assessment on a routine basis of the encounter database, including assessing quantity, quality, and completeness of encounter data.
    - C) comparison of individual encounters to the clinical record through the development and implementation of statistically valid sampling strategy(ies) to conduct chart reviews, including
      - i) verification of dates and times of encounters;
      - ii) verification of diagnostic codes;
      - iii) verification that diagnostic codes are current and complete;
      - iv) review of procedural codes against system records; and,
      - v) review of over-reporting, under-reporting, and inaccurate reporting.
  - 6) Coordination of external program audits and records reviews of the NWESD 189 Behavioral Health Program, specifically:
    - A) coordinate and schedule external audit teams through the Department of Behavioral Health and Prevention Services Director.
    - B) reserve adequate space for the auditors to conduct the audit.
    - C) coordinate with the Department of Behavioral Health and Prevention Services Director in order to ensure auditors have adequate access to clinical records.
    - D) ensure NWESD 189 staff is available, as necessary.
    - E) participate in exit interviews with appropriate NWESD 189 staff, including the Department of Behavioral Health and Prevention Services Director.

- F) provide supports necessary to ensure compliance with external audit findings and any resulting systems' adjustments.
- G) coordinate through the Department of Behavioral Health and Prevention Services Director any response, including requests for additional information, to the audit team within the required timelines.

Financial and compliance audits conducted by the Washington State Auditor's Office are excluded from this procedure.

- 7) Report on timeliness of consumer information data to NSMHA, including whether
  - A) data is submitted to NSMHA within forty-five (45) days of the close of each calendar month.
  - B) transmissions retain NWESD 189's location identifiers.
  - C) data is entered into the database indicating the provision of any emergency service component within three (3) working days from the completion of that service.
  - D) data is submitted to NSMHA at a minimum, once per week.
  - E) data errors are corrected within twenty-five (25) calendar days of receipt of an error report.
  - F) all transactions are final one hundred eighty (180) days after the close of the submission month.
  - G) any data corrections, additions, edits or deletions after one hundred eighty (180) days are submitted to NSMHA.
- 8) Ensure administrative, personnel, and clinical policies and procedures remain current and congruent with statutory and contractual requirements.
- 9) Assist Clinical Supervisor with the development and identification of practice guidelines and then measure fidelity to such guidelines.
- 10) Assist Clinical Supervisor with the selection and application of external evidence-based and promising practices so that fidelity to selected practices can be assessed. The following criteria will be used in selecting evidence-based, promising, or emerging practices:
  - A) demonstrated need;
  - B) cultural competency;
  - C) congruency with regional trends;

D) availability and cost of training needed to achieve fidelity, including supervision requirements; and,

E) availability of appropriate evaluation standards.

The NWESD 189 will notify the North Sound Mental Health Administration (NSMHA) whenever an evidenced-based, promising, or emerging practice is selected for implementation with children, youth, and families eligible for Medicaid services.

The quality manager will develop appropriate methodology and schedule for evaluating fidelity based on program specific requirements.

- 11) Coordinate and monitor required training and certifications/recertification, including ensuring all personnel providing assessment services are certified related to the Child and Adolescent Level of Care Utilization System (CA/LOCUS), the Child and Adolescent Needs and Strengths (CANS), and other assessment tools.
- 12) Review all critical incidents, make recommendations, and provide support related to selected improvement strategies.
- 13) Support the grievance system as requested by the grievance officer.
- 14) Support compliance activities as requested by the compliance officer.
- 15) Collaborate with and support the Director of Behavioral Health and Prevention Services to continuously improve the quality of care of children, youth, and families receiving behavioral health services.
- 16) Represent the NWESD 189 at NSMHA's Quality Management Oversight Committee (QMOC) and Consumer Information System (CSI) Committee meetings.
- 17) Provide the Director of Behavioral Health and Prevention Services with a course of action with a planned timeline for meeting the requirements of the Quality Management officer's duties.

**Compliance with Washington State's Division of Behavioral Health and Recovery (DBHR):**

Should local disputes with other service systems including funding systems (e.g., Healthy Options, other DSHS administrations, NSMHA, counties), the NWESD 189 will comply first with the published directives from DBHR regarding service or cost responsibilities.

Should issues or disputes with other service systems be identified, they will be brought to the attention of the Director of the Department of Behavioral Health and Prevention Services or designee. The Director or designee will ensure that all efforts at dispute resolution are compliant with DBHR published directives.

**Customer Services:** The Department of Behavioral Health and Prevention Services will maintain and publish a toll-free and local customer service number. The Department of Behavioral Health and Prevention Services staff will respond to inquiries in a manner that resolves the inquiry, including the ability to respond to those with limited English proficiency or the hearing impaired.

**Functional Independence:** The following functional responsibilities are established:

- 1) The NWESD 189 grievance officer, security officer(s), and quality manager will operate parallel to the Department of Behavioral Health and Prevention Services.
- 2) The grievance officer, security officer(s), and quality manager will use independent judgment and discretion while performing position-specific responsibilities.
- 3) The grievance officer, security officer(s), and quality manager have the responsibility and expectation to bring issues and concerns to the Superintendent or designee, after doing so with the Director of the Department of Behavioral Health and Prevention Services.
- 4) NWESD 189 staff members are prohibited from attempting to influence the recommendations or decisions of the grievance officer, security officers, or the quality manager, preventing them from investigating “special cause” or “common cause” challenges, or attempting to influence findings or interpretations. This not meant to in any way limit any staff member’s ability, or responsibility, to share differing opinions or to candidly respond to the Superintendent or designee’s questions.

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Reference:  
42 CFR 438  
[WAC 388-877-0320](#)  
[WAC 388-877-410](#)

Cross Reference:  
[NSMHA Policy #1547](#)  
[NSMHA Policy #1553](#)  
[NSMHA Policy #4015](#)  
[NSMHA Policy #4202](#)  
[NSMHA Policy #4205](#)  
[NSMHA Policy #5501](#)  
[NSMHA Policy #5504](#)