

# **SOUTHERN HIGHLANDS COMMUNITY MENTAL HEALTH CENTER**

## **POLICY AND PROCEDURE MANUAL**

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### **Policy 602 – OBMAT Environment and Operation**

#### **Operation Schedule**

When the regular OBMAT practitioner is unavailable, SHCMHC shall ensure that services are not interrupted by having qualified, temporary coverage.

SHCMHC will work to ensure that the programmatic days of operation shall meet the needs of the patients served.

SHCMHC shall notify the patients receiving medication-assisted treatment services in writing at least 30 days in advance of their intent to permanently change service hours.

SHCMHC will utilize the CPST program nursing department to ensure emergency access to prescription and dosage information 24 hours a day, seven days a week should a patient need arise.

#### **Billing**

Payments for services rendered may be made either by Medicare, West Virginia Medicaid, private insurance, or by cash.

Prior to directly billing a patient for any MAT treatment, the SHCMHC OBMAT program shall document in the patient's record the receipt of any rejection of prior authorization, rejection of a submitted claim, or written denial from a patient's insurer, Medicare or West Virginia Medicaid denying coverage for the medication assistance treatment.

The SHCMHC OMBAT program shall also clearly document in the patient's record if the patient has no insurance or has voluntarily and with full knowledge of the financial obligations, including all treatment costs, requested a claim not be submitted to their insurer, Medicare or West Virginia Medicaid.

When any instance described in this section regarding direct billing and acceptance of cash payments from a patient occurs, the SHCMHC OBMAT program shall clearly document in the patient's record the rationale and medical necessity for acceptance into the program.

The SHCMHC OBMAT program may directly bill and accept cash payments from a patient only after the requirements of the OHFLAC OBMAT rule have been fulfilled and documented.

The SHCMHC OBMAT program reserves the right to begin treatment prior to billing if warranted.

### **Provision of Services**

The SHCMHC OMBAT program facility shall have:

- Sufficient space and adequate equipment for the provision of all services specified in the program's description of treatment services;
- Clean, safe and well-maintained patient and staff areas;
- A secure room and lockable equipment for physical patient records and appropriate security mechanisms for electronic records;
- Private offices or areas for patient and group therapeutic meetings, sufficient in number to address the treatment needs of the population served;
- Sufficient restrooms for the estimated patient population with areas for observation of specimen production, if necessary, and;
- Adequate parking areas.

The SHCMHC OBMAT program facility reserves the right to add security personnel in lobby and parking areas if warranted. If contracted staff is used for security, the staff will be trained in patient confidentiality.

### **Infection Control**

The SHCMHC OBMAT program shall implement and maintain an effective infection control program that protects the patients, their families and clinic personnel by preventing and controlling infections and communicable diseases.

The program shall include the implementation of a nationally recognized system of infection control guidelines.

The SHCMHC OBMAT program shall have an active surveillance and education program for the prevention, early detection, control and investigation of infections and communicable diseases.

The SHCMHC OBMAT program shall designate a person or persons, with appropriate education and training, as infection control officer to develop and implement policies governing control of infections and communicable diseases for patients and personnel.

### **Life Safety Policies and Procedures**

The SHCMHC OBMAT program facility will meet other requirements of applicable federal or state regulatory or oversight agencies.

The SHCMHC OBMAT program shall implement and maintain policies and procedures regarding the appropriate and safe administration of medical treatment.

The policies and procedures shall:

- SHCMHC will implement the current emergency plan in case the program must be closed temporarily, including how patients will be informed of these emergency arrangements (notice on door, voice message, email/text portal).
- SHCMHC will ensure that there is appropriately trained staff on duty and are proficient in cardiopulmonary resuscitation.
- SHCMHC will ensure that staff are training and on duty to administer the reversal of opiate overdose.

The SHCMHC OBMAT program shall ensure that the following occurs:

- Provide 24 hour, seven day-per-week access to information so that patient emergencies may be immediately addressed.
- Display in facility offices and waiting areas the names and telephone numbers of individuals or agencies who should be contacted in case of an emergency.
- Maintain an up-to-date disaster plan that specifies emergency evacuation procedures, fire drills and maintenance of fire extinguishers. The disaster plan will be updated annually in June.
- Provide CPI or alternative training for OBMAT employees to address assessment, de-escalation, and the eruption of violent behavior. All employees will be trained to call 911 or security in the event of a potentially dangerous situation.

### **Statistical Reports and Records**

The SHCMHC OBMAT program will file a quarterly statistical report with the secretary on a form as prescribed by the secretary which will include the following information:

- The total number of patients receiving medication-assisted treatment
- The numbers of West Virginia patients and out-of-state patients
- The number of patients discharged from the program
- The reason for discharge, including termination or disqualification, voluntary withdrawal, an unexplained reason.

### **Staff Training and Credentialing**

The SHCMHC OBMAT program shall ensure that all physicians, physician assistants, advance practice registered nurses, registered nurses, licensed practical nurses, counselor, psychologists, therapists, social workers and other licensed or certified professional care providers comply with the credentialing requirements of their respective professions, obtain

and maintain a current license, and complete all continuing education requirement of the licensing board, West Virginia Code § 16-5Y-5(d) and this rule.

Clinical Staff of the SHCMHC OBMAT program may include employees, independent contractors or both.

The SHCMHC OBMAT program will work to ensure that staff and contractors comply with all provisions of the OBMAT rule. All clinical staff members shall complete initial and continuing education and training that is specific to their job function, their interactions with patients, and therapies particular to the program, and the patient populations to be served.

The SHCMHC OBMAT program will have detailed job descriptions for credentialed and non-credentialed staff which clearly define the education, training, qualifications and competencies needed to provide specific services. The job descriptions shall be provided to and reviewed with all employees or interns at the time of the initial interview, upon employment and whenever there are significant changes in job assignment or a modification of the employee or intern's job description or responsibilities.

Within 10 days of hire, any new clinical staff member or intern orientation shall begin specific to the OBMAT program. The administrator or designee shall provide the staff member or intern with an orientation as to the person's primary job responsibilities and requirements. All clinical staff members and interns shall receive formal training in confidentiality issues and requirements prior to working at the program.

The SHCMHC OBMAT program shall maintain confidential individual personnel files for every clinical staff member or intern that shall contain, at a minimum:

- The application for employment, contract or request to work as an intern.
- Documentation of the date of employment.
- Identifying information and emergency contacts.
- Documentation of completion of orientation, internal and external training and continuing education.
- Documentation of all licenses, certifications or other credentials.
- Documentation relating to performance, supervision, disciplinary actions and termination summaries.
- Detailed job descriptions.

The SHCMHC OBMAT program shall utilize the existing SHCMHC policy for disciplinary actions, terminations, resignations, and layoffs (See Policy 280 Disciplinary and Policy 282 Layoffs/Termination of Employment).

## **Risk Management**

The SHCMHC OBMAT program will

- Obtain a voluntary, written, program-specific informed consent to treatment from each patient at admission.
- Inform each patient about all treatment procedures, services and other policies and procedure throughout the course of treatment.
- Obtain voluntary, written, informed consent to the prescribed therapy from each patient before receiving a prescription.

The SCHMHC OBMAT program will inform each patient that:

- The goal of medication-assisted treatment is recovery, stabilization of functioning and establishment of a recovery-oriented lifestyle.
- Detoxification from opioids or other substances is a treatment alternative to an ongoing, recovery-oriented MAT plan of care or treatment strategy
- At each review of the individualized treatment strategy, in full consultation with the patient, program will discuss present level of functioning, course of treatment and future long-term recovery goals.
- A patient may choose to withdraw from or be maintained on the medication as he or she desires.

The SHCMHC OBMAT program shall inform every patient regarding legal requirements and program policies concerning the report of suspected child abuse and neglect as well as other forms of abuse. The information may be provided using a variety of medical including pamphlets, brochures, programs, etc.

The SHCMHC OBMAT program shall inform every patient as to federal confidentiality regulations, 42 C.F.R. Part 2, and the Health Insurance Portability and Accountability Act of 1996, as amended.

The SHCMHC OBMAT program will

- Provide a written description of patient rights and responsibilities.
- Follow due process procedures and observe any applicable medical protocols for any involuntary terminations of patients.
- Ensure that family members of employees do not receive special privileges; and
- Monitor credentialing of all staff to ensure that they maintain current credentials for performing their assigned job duties.