

Provider Communications Plan

Sandhills Center promotes and encourages open channels of communication and active participation with the provider network in order to:

- ensure that providers are aware of information necessary to the provision of behavioral health services to members, and
- comply with Sandhills Center's administrative and clinical requirements and procedures.

Sandhills Center develops and implements a formal communications plan which describes the provider relations program, including the strategies and processes for communications with providers in the network. The Provider Communications Plan is reviewed and revised annually and updated during the fiscal year as needed.

The Plan includes but is not limited to:

- Orientation of new providers;
- Updates of network activities;
- Mechanisms for securing provider manual;
- Changes in fee schedules and contracting provisions;
- Information on how to obtain benefits, eligibility, formulary, complaint and appeals information;
- Provider Dispute Resolution Process
- Mechanisms for Sandhills Center to receive suggestions and guidance from participating providers about how the provider network can best serve members
- Assistance for participating providers and their staff regarding provider network issues.

In order to ensure that open communication and adequate provider / LME-MCO relations are maintained, the following procedures are followed:

1. Sandhills Center's Provider Communications Plan is part of the Provider Manual.
2. Network Development is responsible for developing, updating, and distributing the Plan. The Plan is presented to the Health Network Committee, Network Leadership Council and Quality Management Committee for review and input. It is reviewed and updated typically during the final quarter of the fiscal year.
3. The Provider Communications Plan consists of the following six major segments:
 - a. Provider Orientation;
 - b. Provider Manual;
 - c. Network Leadership Council;
 - d. Provider Website;
 - e. Quarterly Provider forums, and
 - f. Training, Consultation and other Technical Support

1. Provider Orientation

Orientation procedures are as follows:

- a. Sandhills Center informs potential providers of the orientation requirement during the credentialing/contracting process.

- b. *New Provider Orientation*: Orientation materials consist of the 1) the Provider Manual posted on the Sandhills Center website, 2) information about the Provider Help Desk (1-855-777-4652), which offers technical assistance for providers, and 3) additional orientation materials developed by Sandhills Center program/departments posted on the Sandhills Center website. An overview of these orientation resources is shared when the executed contract is mailed to the provider.
- c. *Annual Orientation*: In collaboration with Sandhills Center programs/departments, the SHC Training Coordinator plans and facilitates the annual orientation events for all network providers during the last quarter of the fiscal year. In an effort to provide convenient provider access, this orientation is held in at least two (2) locations within the Sandhills catchment area. Electronic notice of the annual orientation schedule and agenda topics is sent to providers in a timely fashion and is posted on the Sandhills Center website. Provider participation in the annual orientation is documented and maintained through sign in sheets.
- d. Orientation agendas are planned to provide network providers with the information necessary to comply with all applicable requirements/standards, including but not limited to:
- Overview of Sandhills Center’s mandate and function; information regarding Sandhills Center’s administration;
 - Overview of Sandhills Center website and how to find information on website, including:
 - 1) Mechanisms for securing DMA and DMH/DD/SAS updates, Sandhills Center provider updates, and updates of network activities;
 - 2) Mechanisms for locating and/or securing Provider Manual;
 - 3) Location of information concerning technical assistance, training announcements, frequently asked questions from the Provider Help Desk, and Sandhills Center Personnel Contact Information for provider questions;
 - 4) Mechanism for Sandhills Center to receive suggestions and guidance from participating providers about how the provider network can best serve members
 - Participating Provider Responsibilities, including;
 - 1) Member Rights and Responsibilities;
 - 2) Eligibility information
 - 3) Clinical criteria;
 - 4) Use of Electronic Slot Scheduler;
 - 5) Authorizations and utilization review;
 - 6) Care management requirements;
 - 7) Documentation requirements;
 - 8) Access and Availability criteria;
 - 9) First Responder Responsibilities;
 - 10) Billing and Claims;
 - Quality Management, including
 - 1) Service Monitoring
 - 2) On-going Monitoring by Credentialing Department;
 - State and Federal Requirements;
 - Cultural Competency;
 - Glossary of Terms;
 - Credentialing and re-credentialing procedures, and
 - Sanctions, Disputes and Appeals.

2. The Provider Manual

The Division of Medical Assistance (DMA) requires Sandhills Center to develop a Provider Manual (Manual) that informs network providers and potential providers of Sandhills Center's processes, procedures, deadlines and requirements. Sandhills Center is dedicated to providing a manual that is user-friendly, contains up-to-date information, is written in clear concise language, and is easily accessible.

The manual is a viable part of Sandhills Center's Communications Plan. The manual covers Sandhills Center's purpose, mission, and treatment philosophy and community standards of practice, as well as:

- Introduction and Overview of Sandhills Center
- Governance and Administration
- Provider Network
- Contracts
- Member Rights and Empowerment
- Benefit Package
- Access, Enrollment and Authorization of Services
- Service Definitions and Criteria
- Resources for Providers
- Getting Paid
- Standards and Regulatory Compliance
- Reconsideration Review Process for Providers
- Covered Services
- Glossary of Terms
- Acronyms

Sandhills Center ensures the Provider Manual is kept current through the following processes:

1. Network Operations is responsible for updating and maintaining the Provider Manuals for Medicaid and IPRS funded services, and to have the manual and updates posted on the Sandhills Center website.
2. Sandhills Center Program and Department Directors shall send information regarding their updated policies and/or procedures at least annually or as revisions are needed, to Network Operations for inclusion in the Provider Manual.
3. Information received from the Division of Medical Assistance and the Division of Mental Health Developmental Disabilities and Substance Abuse Services is added to the Provider Manual as needed.
4. Network Operations presents the Provider Manual to the Network Committee and the Quality Management Committee for review and approval on an annual basis and during the fiscal year if revisions are made.
5. Network providers are notified electronically when changes are made to the manual and also on an annual basis during the final quarter of the fiscal year.
6. Upon written request, hard copies of the Provider Manual can be made available to providers.
7. Network Operations will inform providers of revisions to the manual at Quarterly Provider Meeting(s).

3. The Network Leadership Council and the Clinical Advisory Committee

Sandhills Center implements a formal strategy to involve network providers in committees that address clinical and provider payment policies (URAC NM-5). It recognizes the importance of network provider

input and participation in decision making, in order to promote a collaborative environment between the LME-MCO and providers.

Network Leadership Council (NLC)

The overall purpose of the Network Leadership Council is to ensure that provider perspective is represented in the Sandhills Center Health Network processes and operations and to assist in building and maintaining a diverse provider network that meets the needs of members pursuant to State requirements.

NLC membership consists of network providers, Sandhills Center staff, representatives from the Consumer and Family Advisory Committee (CFAC), and the Community Care of NC (CCNC). The Council is co-Chaired by a participating provider and a Sandhills Center Network Operations staff member.

Providers serving on the Council are expected to represent other providers delivering the same or similar services and not their own individual agency/practices. Provider representation must directly reflect network composition and may include individuals in either managerial/leadership and/or clinical roles, in each disability area and both large and small providers.

The Committee has input in matters including, but not limited to:

- Service initiatives to address service needs/gaps
- Evidence-based practices
- Network training
- Development and annual review of the Sandhills Center Cultural Competency Plan
- Provider Communications Plan
- Provider Manual and Web Site
- Provider Code of Ethics
- Review & input of Sandhills Center provider disputes / appeals policies and procedures
- Review & input of provider disputes & appeals related to professional conduct or competence

Clinical Advisory Committee (CAC)

The Clinical Advisory Committee is the forum for discussion and approval of clinical treatment practices and community standards of care that are used in the Sandhills Center provider network. Additional CAC functions include credentialing and disputes/appeals.

Members of the Clinical Advisory Committee include network provider representatives that have no role in Sandhills Center's management, Sandhills Center Chief Clinical Officer/Medical Director and Sandhills Center staff. The Chief Clinical Officer/Medical Director is responsible for oversight of clinical aspects of the credentialing program in cooperation with the Clinical Advisory Committee.

The Clinical Advisory Committee is a rotating membership composed of licensed independent practitioners—MD's, practicing psychologists, LCSW's, LCAS's, and PLC's—who are representative of our provider network with regards to discipline, specialty, clinical competencies, geographic locations, and agency size. Additionally, this committee has representatives from the LME-MCO's CCNC Network and members who are academic experts in the mental health field. These experts are not members of the provider network, but they reside within the Sandhills Center LME-MCO geographic area.

CAC membership is comprised of active practicing licensed clinicians that mirror the network composition in addition to Sandhills Center LME-MCO employees, licensed non-network healthcare practitioners residing within the LME-MCO's geographic area, and Sandhills Center licensed clinical leadership staff. The

Chairperson of the committee is the Sandhills Center Chief Clinical Officer/Medical Director. Meetings are convened at least quarterly and/or as needed.

Sandhills Center Clinical Advisory Committee Scope of Responsibilities & Duties:

- (1) Review of Evidenced based clinical practice guidelines in conjunction with recommendations from Sandhills Center Integrated Care partners.
- (2) Review clinical decision support tools/utilization management criteria
- (3) Review of Customer Services clinical triage and referral processes
- (4) Identification of training needs of providers
- (5) Evaluation of service utilization as related to clinical guidelines
- (6) Evaluate data from Quality Management audits, Gaps Analysis and other data tools as resources for monitoring and effective clinical guidelines implementation.
- (7) Review of credentialing program and function as Credentialing Committee
- (8) Function as provider dispute/appeals committee
- (9) This Committee will be the primary gate keeper for consideration of new/innovative services and rate changes for services that adhere to clinical practice continuums of services and emerging best practices. Recommendations regarding such will be provided to the Sandhills Center Medical Director who will ultimately decide which rate changes and new/innovative services will be forwarded to the CEO for consideration.

Credentialing Subcommittee: Ensures that the Credentialing Sub Committee membership is broad enough that appropriate clinical peer input with knowledge of service specific standards of care is available when reviewing credentialing applications and Provider Dispute/Appeals related to professional conduct or competence.

- The Credentialing Subcommittee is composed ONLY of non Sandhills Center members of the CAC who hold active and unrestricted licensure in their field and these members are the only ones casting votes on credentialing matters. The Sandhills Center medical director chairs the subcommittee. In the case of a tie vote, the Sandhills Center medical director casts the deciding vote.

Credentialing/Re-Credentialing Functions:

- Review overall direction of the credentialing program, including review and approval of credentialing policies/procedures
- Review and approval of credentialing criteria for services
- Review and approval and/or disapproval of providers requesting enrollment in the network through credentialing/re-credentialing enrollment procedures
 - a. The Credentialing Subcommittee has delegated authority to the Chief Clinical Officer/Medical Director to approve “clean” credentialing applications” as defined as: **Credentialing applications with no open actions from any regulatory body/law enforcement agency and credentialing applications with no closed/resolved actions from any regulatory body/law enforcement agency within the last 3 years. The previous definition also applies to matters of re-credentialing in addition to having no negative entries in the provider profile system.**
 - b. The definition of an “unclean” application for credentialing & re-credentialing is any application with adverse actions of three (3) or younger & COMPLETED QM issues. Unclean credentialing & re-credentialing applications are discussed monthly by the Clinical Advisory Committee & minutes documented. The credentialing subcommittee is composed ONLY of non-Sandhills Center member of the CAC who hold active & unrestricted licensure in their field & these members are the only ones casting votes on credentialing matters. The Chief Clinical Officer/Medical Director chairs the subcommittee and in the case of a tie vote, the Sandhills Center Chief Clinical Officer/Medical Director casts the deciding vote.
- Evaluate the effectiveness of the credentialing program

Provider Dispute/Appeals Functions:

- Review and approval of provider disputes/appeals policies/procedures
- Review of provider disputes and appeals related to professional conduct or competence
- Complete annual assessment of provider dispute resolution activities

4. Provider Code of Ethics (Attachment 2)

5. Sandhills Center Website

Sandhills Center maintains a website to disseminate and continually update information for members, providers, stakeholders and the community. The website includes a “*For Providers*” section that can be accessed through the homepage. Information on the website for providers includes, but is not limited to:

1. Links to the *Division of Medical Assistance* and the *Division of Mental Health, Developmental Disabilities and Substance Abuse Services* for access to Medicaid Bulletins, Communication Bulletins, Implementation Updates, Regulations, etc.
2. Action Alerts and Budget Updates;
3. Incident and Death Reporting forms and instructions;
4. Service Definitions;
5. Fraud and Abuse;
6. North Carolina TOPPS Guidelines;
7. Person Centered Plan Manual and updates
(<http://www.ncdhhs.gov/mhddsas/providers/personcenteredthinking/index.htm>);
8. Training opportunities;
9. Sandhills Center Provider Directory;
10. Sandhills Center Provider Manual;
11. Instructional manuals and forms;
12. Sandhills Managed Care Software System User Guide, Forms & Instructions, and Links
13. Quarterly Provider Forums dates and Agendas
14. Sandhills Center memoranda, and
15. Links to:
 - a. The Division of Health Service Regulation;
 - b. SAMHSA;
 - c. NAMI;
 - d. The North Carolina Council of Community Programs, and
 - e. Other information and resources as needed

6. Quarterly Provider Forums

Provider forums are held four (4) times each year and are coordinated and facilitated by the Training Coordinator. Sandhills Center administrative and clinical staff present program updates, review significant changes in state and federal requirements, and provide other information that will assist network providers in achieving compliance with requirements to remain in good standing with both Sandhills and the State. Outside subject matter experts may be part of these meetings as well.

Sandhills Center’s Executive Management and Department Directors provide input to the Training Coordinator regarding topics to be covered during the forums. Additionally, input and concerns voiced by members and network providers are reviewed for consideration as possible agenda items.

Provider Forums are informative and interactive, providing an opportunity for network providers to ask questions, obtain clarification and voice concerns. Evaluations are completed by participants. Summaries are

prepared with oversight of the Training Coordinator and shared with forum presenters in an effort to improve future forums. A training event is held immediately following the quarterly forum, when possible.

7. Training, Consultation, and other Technical Support

a) Provider Training

Sandhills Center is committed to having a trained LME-MCO workforce & provider network. Under the direction of the Training Coordinator, an annual training plan is developed, consisting of training to promote the use of evidence-based practices, assist providers in meeting technical requirements and meet state, federal and URAC requirements. It reflects the needs & priorities of Sandhills Center and its providers. It is formatted to show the training topic, the source of the training request(s), target audience and anticipated training date. This plan is an addition to the Sandhills Center's agency wide new employee and annual orientations, training is offered in work units to meet unit / individual job specific requirements, and training / technical assistance offered by specific Sandhills Center departments.

Consideration of the following contributes to the development of this plan:

- NC Division of Medical Assistance (DMA) training requirements
- NC Division of Mental Health, Developmental Disabilities and Substance Abuse Services (DMH/DD/SAS) training requirements
- URAC training requirements
- Sandhills Center Local Business Plan (2013 – 2016)
- Sandhills Center Staff Training Policy and Procedures
- Provider Manual
- Provider Communications Plan
- Cultural Competency Plan
- Quality Management Plan
- Requests from Sandhills Center departments, including those based on Quality of Care Concerns, Provider Performance Trends and Quality Improvement Project outcomes
- Sandhills Center Annual Services Needs/Gaps Strategic Plan
- Provider Satisfaction Survey summary
- Clinical Leadership Team (CLT)
- Network Leadership Council (NLC)
- Consumer and Family Advisory Committee (CFAC)
- Annual Training Needs Assessment which includes:
 - Training Assessment completed by network providers
 - Meetings with Sandhills Center leadership
 - Requests from training evaluations and quarterly provider forums

Sandhills Center offers a broad scope of training for its providers through the Sandhills Center region. The Training Coordinator researches trainers and manages training activities to meet state, federal and URAC requirements and to assist in meeting provider training needs. This is accomplished with the assistance of the AHECs, NC Council of Community Programs and other statewide resources. Training is funded by Sandhills Center, with no cost to network providers.

Training events are typically scheduled to occur two times each month. Additional topics may be added as training needs are identified.

Examples of training topics and activities include the following:

1. Monthly 2 hour teaching case conferences specific to the clinical needs of providers;
2. ASAM Criteria;

3. Cultural Competency/Diversity and Resources;
4. Dialectic Behavioral Therapy;
5. Cognitive Behavioral Therapy;
6. Family Therapy Skills;
7. Group Therapy Skills;
8. Motivational Interviewing Practicum;
9. Program Consultation with Subject Matter Expert;
10. Wellness and Recovery;
11. Substance Abuse Best Practices;
12. Introduction to Human Resources;
13. Minimizing Billing and Documentation Errors;
14. Accreditation Concerns;
15. Crisis Planning;
16. Quality Improvement Plans and Studies;
17. Increasing Productivity;
18. Medicaid Compliance; and
19. Creating an Ethics Compliance Plan
20. Documentation Training

b) Technical Assistance

Sandhills Center offers technical assistance to providers in navigating the behavioral health services system, and guidance regarding the requirements and expectations of the State and Sandhills Center.

Network Operations receives the information gathered from the Division of Medical Assistance and the Division of Mental Health, Developmental Disabilities and Substance Abuse Services websites and promptly sends it to network providers via electronic transmission.

Network Development/Contracts maintains a comprehensive provider email distribution list of network providers. Network providers maintain and update their own internal lists.

Provider Help Desk Coordinators, the designated contact for providers in need of technical assistance, will:

1. Respond to provider’s requests within two (2) business days by contacting the subject matter expert within the organization and responding to provider, or by directing the provider to the subject matter expert;
2. Post provider questions and answers on the website on a monthly basis, and
3. Monitor website to ensure information posted for providers is current and accurate

c) Evaluation of the Provider Communications Plan

Network Operations annually evaluates the Provider Communications Plan to determine effectiveness and the need for any changes. In addition, Sandhills receives feedback regarding the Provider Communications Plan on an ongoing basis through the following mechanisms:

1. Review of provider evaluations from quarterly provider forums and training events that it sponsors;
2. Dialogue with members of the Network Leadership Council;
3. Annual Service Needs /Gap Strategic Plan;
4. Administrative and Clinical staff feedback;
5. Input from the Consumer Family Advisory Committee obtained from Customer Outreach/Education/Advocacy Coordinator and
6. Input received by Sandhills Center staff from other stakeholders

Network Operations compiles information into a summary report which is presented to the Health Network Committee, Network Leadership Council and the Quality Management Committee for review and recommendations.