



**Detroit Wayne
Integrated Health Network**

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March 19, 2020

To: DWIHN Providers
From: Polly McCalister-Director of Recipient Rights
RE: Emergency Operations Plan of Action

In an effort to do our part in mitigating the exposure and effects of COVID-19 the ORR are coordinating as many upcoming trainings, site reviews and meetings as possible over the phone and email. As of 3/17/20, in response to the current public health crisis all State of Michigan Recipient Rights Offices were advised by MDHHS ORR to:

*“During the public health emergency, it is understood that you may have some timeline issues with RRAC and Appeals meetings, new hire training, site visits and complaint resolution. All of these are still required by law and we will want to see what alternative methods you have put in place to accomplish the **tasks such as online new hire training with a face-to-face later**, notice to providers of rescheduled site visits, notice to public and providers of how to file complaints during the public health emergency and documentation of attempted telephone interviews or notice of future scheduling of F2F interviews. **CMH RRAC meeting changes must be posted in accordance with the Open Meetings Act. You should keep good documentation to show that delays are due to the coronavirus/ COVID-19 public health crisis, in addition to documentation of the efforts you make to comply with legal requirements regarding RR standards. Make sure your status reports are done and timely, even if you go over 90 days.**”*

DWIHN ORR’s Plan of Action to ensure compliance and the needs of our participants and providers are met, the following has been implemented:

All RR staff shall save and/or print (as possible) any correspondence relating to any delay and/or change in processes, in response to the public health crisis. For example, site reviews (physical environment inspections of contracted providers), 5-day Acknowledgement Letters and any other time sensitive complaint resolution letters and/or reports that will be impacted during DWIHN ORR’s temporary remote operations, will include documentation relative to the public health crisis and DWIHN ORR’s alternative efforts to continue to provide Mental Health Code mandated rights protections. DWIHN ORR will be notifying complainants and respondents via email Reports of Investigative Findings and/or Summary Reports. DWIHN ORR will also be documenting any telephone calls made to Complainants and Respondents, when email is not available, of the expected delays in receiving hardcopy correspondence via US Mail. Documentation of all changes in processes will be maintained for forthcoming auditing and compliance purposes.

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Please review the following regarding RRAC meetings, site reviews, Recipient Rights face-to-face training, rescheduled site visits, notice to the public and providers and how to file a Recipient Rights complaint during the public health emergency.

Recipient Rights complaints (Hotline)

Our current ORR tollfree hotline/telephone is 1 (888) 339-5595. The complaints process remains active with no interruption of service. The ORR hotline is checked several times per day by ORR clerical staff and the Intake Manager (as a back-up) who then emails the callers information or complaint to the appropriate RR-Investigator for follow-up, copying members of management. Based on the information received during call back, the Investigator will process the complaint using MH-WIN and an investigation will be initiated or it will be referred (via email) to the appropriate outside agency if it is outside of DWIHN ORR's jurisdiction.

To ensure the assigned tasks are being completed each staff member has been advised once they complete an assigned task they shall email their supervisor that task has been completed and the supervisor can verify it has been completed.

As it relates to complaints received by mail this process will only be problematic until the public health emergency has been lifted and staff has obtained a return to work. *However, an online message may need to be generated requesting for anyone that wishes to file a complaint by mail submit it either telephonically or online and refrain from mailing it as their complaint maybe delayed due to the public health emergency. Main fax line: (313) 833-2043 or the Tollfree Hotline: 1 (888) 339-5595.*

Incident Reports and Death notices

Incident Reports and Death notices are being received by the ORR Main Fax: (313) 833-2043 and the ORR Tollfree Hotline: 1 (888) 339-5595. Once, received they are processed by the intake clerical staff and then assigned to an investigator for processing.

Site Reviews

The Site Review process will continue with Investigators requesting all required documents be emailed or scanned to the investigator until the Executive Order has been suspended or safety provisions have been approved. All Investigators shall submit an email to the provider stating the documents are being requested via email due to the COVID-19 pandemic and site visits will be conducted at a later date.

Alternative -Face-to Face Recipient Rights Training

To communicate and inform all providers and staff requiring new hire and annual training DWIHN has placed a written banner on **MH-WIN** explaining the Face-to-face training is being replaced with an online training (visual) to ensure training is continued. All written correspondence to the State of Michigan, providers and individuals requiring Recipient Rights training will be maintained for documentation purposes for audits.

Effective March 9, 2020, the Recipient Rights Face-to-face training was suspended. However, moving forward our two trainers will develop training via the blue jeans app to ensure compliance for new hires, and annual training for employees. Each staff member requiring the training will sign up online on the DWIHN Recipient Rights Training site. The staff member will be emailed a link to participate online and receive the required training documents for review.

After the training is completed each individual will be emailed an examination and a survey to be completed within one hour at which time the examination and survey will be emailed to the trainers. The certificate will be emailed at a later date.

The trainers plan to record the training via blue jean within the next week (March 23-27,2020) or sooner depending on the acceleration or deceleration of the COVID-19 pandemic.

However, until such time the following will be implemented to ensure compliance for all new hires:

The following instructional measures will be implemented to ensure compliance for new hires training:

The following is being offered to those new hire employees that previously registered for the New Hire Training on MHWIN, which were cancelled. The trainers will send those new hires the training documentation. When the trainers complete the training from the list they will open registration in MHWIN.

Instructions: New Hire Recipient Rights Training via Internet

The DWIHN-Office of Recipient Rights (ORR) has set up the following process to ensure New Hire Recipient Rights Training (NHRRT) continues during the Covid-19 crisis. Please follow the steps below to stay within the 30 days of hire NHRRT requirement. Please note that this is a temporary process designed as a result of the “social distancing” restrictions deemed appropriate as a result of the Covid-19 crisis. Those who attend this online version of NHRRT class will still be required to attend a live class to be determined at a later date. Those participants that received the NHRRT documents via email, will not be deemed “non-compliant” with the “within 30 days of hire” mandate, when they return to take the face to face NHRRT.

ORR Trainers: Michael Olver and Jaqueline Frazier

Step 1: Assignment Thoroughly read the New Hire Recipient Rights Training documents:

- Desk Reference Guide
- NHRRT PowerPoint Handout

Step 2: Email any questions you have to the following email address: orr.training@dwihn.org Michael or Jacque will respond to your questions via email by 4pm that day.

Step 3: After completing the steps above please send an email confirming completion of the reviewed materials.

Step 4: Test procedure: Upon completion of Steps 1-3 you will be sent a test. Please write your name, date and time of your examination at the top of the test and answer all of the questions. *Email your completed test back to the ORR Training Team at orr.training@dwihn.org within 4 hours of completion.*

If for any reason you need an extension, please email your request to orr.training@dwihn.org and justify the extension. One of the trainers will respond to your request with an approval.

RRAC Committee Meetings

The next RRAC committee meeting is scheduled for May 5, 2020, if the public health emergency has not been lifted, the meeting will be live streamed for public viewing and comments. All emails will be printed and maintained regarding any changes within the ORR-RRAC processes.

Appeals Committee Meetings

Once the mail delivery has been implemented the intake manager will gather the appeals and scan them and email them to the RRAC committee. (mail delivery maybe our only setback)

In the event a Recipient Rights Appeal request is received during the current public health crisis, the DWIHN ORR Appeals Facilitator will document receipt of the appeal and notify the Appeals Committee via email of the Appeal request. Any appeals received that warrant convening an Appeals Committee meeting, the meeting will be held via conference call or live streaming during the current public health crisis. Documentation of these actions will be maintained for future audits and assessment purposes.

(Appeal requests are generally submitted to the rights office via U.S. Mail. Appeals are then reviewed and heard by the Appeals Committee with a copy of the hardcopy file retrieved from ORR's central file room. Both of which we currently do not have access to).