Squaxin Island Tribe
Squaxin Island Health Clinic

Policies and Procedures

SQUAXIN ISLAND HEALTH CLINIC
MISSION STATEMENT

The mission of the Squaxin Island Health Clinic is to provide for the physical, mental and spiritual well being of the Squaxin Island community.

1.0 DEFINITIONS:

Emergency: a threat to the loss of life and/or limb

Purchased Referred Care (Contract Health Service) Delivery Area (CHSDA): This is the area which is used to determine patient's CHS eligibility.

Descendant: A non-enrolled child through age 19 of an enrolled tribal member. For further clarification see Indian Health Manual Part 2 (2-3.65).

Direct Services: Medical, dental and other health services offered at the Squaxin Island Health Clinic. Direct services do NOT include laboratory services (medical or dental) or the pharmacy.

Fraud, Waste and Abuse: Fraud is any intentional deception (including attempts to produce such deception) for the purpose of depriving the Health Clinic of resources and/or securing a benefit, privilege, or consideration to which the party is not entitled.

Waste is the intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of Health Clinic resources to the detriment or potential detriment of the department and/or community.

Abuse is the intentional, wrongful, or improper use of Health Clinic funds or the intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of Health Clinic resources.

HIPAA: Health Insurance Portability and Accountability Act; 1996 federal guidelines on the use of patient's health information

Medical Advisory Team (MAT): An advisory body for the health team within the Health Clinic consisting of 5 individual members who meet regularly to discuss policies, medical issues and cases of fraud, waste and abuse.

Native American: Any enrolled member of a federally recognized tribe. This does not include Alaska Native Corporations or Allottee Associations, since their members are descendants rather than enrolled tribal members.

Primary Care: Preventive health care and routine medical care that is typically provided by a doctor trained in internal medicine, pediatrics, or family practice, or by a nurse, nurse practitioner or physician's assistant. This type of care emphasizes the patient's general health needs as opposed to a specialized or fragmented approach to medical care.

Reservation: For purposes of these policies, reservation refers to the area of the original and new Squaxin Island housing complexes.

Secondary Care: Services provided by medical specialists who generally do not have first contact with patients. Consists of specialized care requiring more sophisticated and complicated diagnostic procedures and treatment than provided at the primary care level.

Tertiary Care: Specialty and sub-specialty care that often uses new technologies and therapies to treat rare conditions or unusual cases. Usually available to patients with conditions that are too complicated, too advanced or too unusual to be treated by general physicians or general acute care hospitals.

2.0 HEALTH PROGRAMS

2.1 Primary Care Services

2.1.1 Hours of Service

The normal hours of operation for the Squaxin Island Health Clinic are:

Monday through Friday from 8:00am to 12pm and 1pm – 5pm.

The Health Clinic closes for the following observed holidays: Billy Frank Day, Spring Holiday, American Indian Day, Memorial Day, 4th of July, Labor Day, Thanksgiving, the Friday after Thanksgiving, Christmas Eve, Christmas Day, New Year's Eve, and New Year's Day.

It is common practice for the Health Clinic to be closed for a partial or full day for the funeral of a tribal elder. Community members are encouraged to call the Health Clinic on these days to verify the hours of service.

There are occasional closures for in-service training or other departmental needs. The Health Clinic will make every effort to alert the community of these closures in advance when possible.

In case of inclement weather, the Health Clinic follows the closure policy of the Shelton Public School System. On days when the Shelton schools close for bad weather, the Health Clinic will be closed. Community members are encouraged to listen for local school closures in cases of inclement weather.

2.1.2 Explanation of Services

The Squaxin Island Health Clinic offers quality primary care and referrals for specialty care. Our providers follow current acceptable community standards of care and all appropriate Washington State Administrative Codes (WACs). Primary Care services include both preventive and curative care.

Referrals for specialty care are made by Squaxin Island Health Services providers. Decisions about appropriate and acceptable specialty providers and referral care are at the sole discretion of the Squaxin Island providers.

2.1.3 Eligibility Policy

Who is eligible for Direct Care?

- Squaxin Island tribal members and descendants
- Other Native Americans and their descendants
- Community members including non-Native spouses, descendants, and previously established patients.

2.1.4 Policy for Use of Direct Care Services

Squaxin Island Tribal members are seen on a priority basis. Patients are required to make an appointment before receiving primary care services at the clinic. Non-urgent appointments are scheduled by the medical receptionist or front desk clerk at the clinic. Same day appointments

for urgent care need to be reviewed and scheduled by the nurse or medical assistant who are qualified to determine medical need and priorities.

In case of an emergency, patients should always call 911 as a first response.

In order to receive care at the Health Clinic, each patient must annually:

- Complete a patient registration form (REF)
- Provide current address verification
- Provide a copy of his/her social security card
- Show proof of eligibility
- Sign acknowledgement of the Health Clinic's HIPAA policy
- Sign agreement to pay uncovered services in a timely manner.

A 24-hour notice is required to cancel an appointment. If a patient repeatedly fails to attend scheduled appointments, the clause of fraud, waste and abuse will apply (See section 5.0.) In these cases, the Medical Advisory Team will judge the pattern of abuse and determine any necessary disciplinary actions.

2.1.5 Laboratory Services

The Squaxin Island Health Clinic has limited laboratory capabilities. Any lab work that is done within the Health Clinic is considered a direct care service.

Squaxin Island receives a discounted rate from a contracted laboratory facility for most lab procedures. Although blood, urine and other samples may be collected at the Squaxin Island Health Clinic, they are sent out to this lab for analysis. Therefore, these procedures are NOT considered to be direct care services since they are not being performed at the Health Clinic. ***Patients who are not PRC/CHS eligible will be required to pay for these services.*** The patient or their insurance will receive a bill from the laboratory and are responsible for timely payment.

2.2 Purchased Referred Care (PRC)/Contract Health Services (CHS)

2.2.1 Hours of Service

The PRC/CHS office maintains the same operating hours as the Health Clinic.

2.2.2 Explanation of Services

PRC/CHS is not an entitlement program. It is designed to assist enrolled tribal members to pay for quality diagnostics, treatment and follow up care. PRC funds are distributed for payment of medical services received outside of the Squaxin Island Health Clinic.

PRC/CHS funding is distributed on a first-come, first-served basis for eligible recipients. When funds are insufficient to serve all of the needs of those eligible for PRC/CHS, priorities for services shall be determined on the basis of relative medical need. Annually, the Medical Advisory Team (MAT) determines the priority level of the PRC/CHS program. This level may be re-assigned during the fiscal year if the need arises.

Medical priority levels as defined on the federal level by the Indian Health Service include:

Priority 1:	Emergent/Acutely Urgent Care Services
Priority 2:	Preventive Care Services
Priority 3:	Primary and Secondary Care Services
Priority 4:	Chronic Tertiary and Extended Care Services
Priority 5:	Excluded Services

A full definition and partial listing of the services included in each of these priority levels can be found on the Indian Health Service website or at the PRC/CHS office.

2.2.3 Eligibility Policy

The federal CHSDA for Squaxin Island includes tribal members residing in Mason County ONLY. This is the population for which funding levels for the Squaxin Island Contract Health Services Program are calculated. However, the current Squaxin Island CHS Delivery Area, as approved by Tribal Council, includes enrolled Squaxin Island tribal members living in Mason, Thurston, Grays Harbor and Pierce Counties.

Who is eligible for **PRC/CHS** coverage?

- Squaxin Island Tribal members living in the Squaxin Island CHSDA, as approved by Tribal Council.
- Enrolled Native Americans and their descendants through age 19 living on the Squaxin Island reservation.
- Spouses and/or partners of Squaxin Island tribal members living in the Squaxin Island PRC/CHS delivery area for pre-natal services **only.**
- Descendants (any age) of Squaxin Island Tribal members living in the original CHSDA-Mason County ONLY.
- Descendants of Squaxin Island Tribal members in the tribally approved CHSDA, through age 19 living in their parent's home.
- Community members with social and economic ties established prior to 1999.

Who is not eligible for PRC/CHS coverage?

- Non-native persons.
- Other Native Americans living off of the Squaxin Island reservation.
- Squaxin Island tribal members living outside of the Squaxin Island PRC/CHS Delivery area, as approved by Tribal Council.
- Squaxin Island tribal members living on another tribal reservation.

Alternate Resources:

- All patients **are required to apply for and use all available alternate resources** such as Medicare Parts A, B and D, state Medicaid, state or other federal health program, private insurance, employment based insurance etc.

2.2.4 Policy for Accessing PRC/CHS Dollars

General Policy

All clients must obtain a Purchase Order from the PRC/CHS office **before** receiving any services and/or medications outside of the Health Clinic. However, a purchase order is not required for

lab work that is collected and ordered by providers within the Squaxin Island Health Clinic. (See above section 2.1.5 entitled "Laboratory Services".)

PRC/CHS requires that all clients provide the following documentation **before** receiving a purchase order:

1. Completed Registration and Eligibility Form (REF),
2. Enrollment letter,
3. Verification of address such as a utility bill, and
4. Copy of his/her social security card.
5. Documentation of other medical coverage or denial.

All above documentation needs to be submitted **annually** to keep records current.

PRC/CHS purchase orders will only be available for referrals to doctors that are on the existing provider list. Information about acceptable providers can be obtained from the PRC/CHS office upon request.

Emergencies

In the case of an emergency (see definitions) in which medical care is received outside of the Health Clinic without prior PRC/CHS authorization, the patient must contact the PRC/CHS office within 72 hours of receiving care.

The PRC/CHS office will review the patient's eligibility, compliance with notification requirements and clinical information before approving PRC/CHS payment. Payment will be approved only for those cases which abide by all PRC/CHS policies.

Because the emergency room is the most expensive way of obtaining medical care, it is important that patients use other alternatives such as urgent care facilities whenever possible.

Emergency room expenses resulting from broken appointments will not be covered by PRC/CHS.

Primary Care

All patients are required to see Squaxin Island Health Clinic providers first for their primary care needs. PRC/CHS will only pay an outside facility for primary medical care if:

- Squaxin Island providers are not available at the time of need.
- The patient is receiving on-going care from the outside provider.
- Rare exceptions that are approved in advance by the Medical Advisory Team.

Dental Care

PRC/CHS-eligible dental patients are required to see a Squaxin Island dental provider first to obtain a referral for any outside dental facility for care.

Behavioral Health (Mental Health and Substance Abuse Services)

Patients in need of mental health and substance abuse outpatient counseling are required to receive care from the Squaxin Island Behavioral Health Counselors first. PRC/CHS will only pay for counseling at an outside facility after a referral from one of the Squaxin Island counselors.

The Health Clinic has established a working agreement with the Northwest Indian Treatment Center to provide support services for those in need of In-patient Chemical Dependency Treatment. Other In-patient treatment options must be approved prior to use.

2.3 DENTAL CARE SERVICES

2.3.1 Hours of Service

The operating hours of the Dental Office are dependent upon the schedules for the dental hygienist and the providers. Patients need to call the Dental Clinic for clarification of hours of service.

2.3.2 Explanation of Benefits:

Squaxin Island Health Services offers quality care through the Dental Clinic. Available services include curative and preventive care such as routine check-ups, fluoride treatments, cleanings, sealants, periodontal therapy, fillings, crowns, root canals, extractions, bridges, dentures and partials.

2.3.3 Eligibility Policy:

The eligibility policy for the Dental Clinic is identical to that for the primary care programs listed in 2.1.3.

2.3.4 Policy for Use of Dental Care Services

Community members are required to call the Dental Clinic for dental appointments. Due to the overwhelming need in the community, wait times will vary. PRC/CHS eligible patients are required to see a Squaxin Island dental provider before being referred to an outside dental facility. Referrals will only be made if the required treatment is not available at the clinic.

A 24-hour notice is required to cancel an appointment. Broken appointments will not be immediately rescheduled, but the patient will be placed on a waiting list so as not to penalize others who are waiting for treatment. If a patient repeatedly fails to attend scheduled appointments, the clause of fraud, waste and abuse will apply. (See section 5.0) In these cases, the Medical Advisory Team will judge the pattern of abuse and determine any necessary disciplinary actions.

As with Medical treatment, emergency room expenses resulting from broken appointments will not be reimbursed by PRC/CHS.

2.4 PHARMACY

2.4.1 Hours of Service

The operating hours for Kamilche Pharmacy are subject to change and will be posted.

Kamilche Pharmacy closures are consistent with those for the Health Clinic listed in 2.1.1.

2.4.2 Explanation of Benefits

The Kamilche Pharmacy is located in the Squaxin Island Health Clinic. Prescriptions must be requested in person or via telephone at 432-3990 or via fax at 432-3980.

Most medications can be received within 24 hours. Medications must be picked up during the hours of operation.

Some prescriptions (e.g. controlled substances) require an appointment with the provider each time they are filled.

2.4.3 Pharmacy Eligibility Policy

The eligibility policy for the Pharmacy is identical to that for the primary care programs listed in 2.1.3. with one notable exception: Kamilche Pharmacy is a 340B Pharmacy, therefore, in compliance with Federal Guidelines, customers must be active patients (within one year) of the Squaxin Island Health Clinic.

2.4.4 Payment Policy

Payments will be collected in the following order of priority:

- Applicable private insurances will be billed first. The pharmacy does NOT accept all insurance. Please inquire before filling your prescription.
- Squaxin Island PRC/CHS will pay for prescribed medications (on approved formulary) and co-payments of Squaxin Island enrolled members.
- Other pharmacy customers (including other natives and descendants who are not PRC eligible) may pay cash for prescriptions.
- Payment for all over-the-counter medications are the responsibility of the patient.

Patients who use PRC/CHS dollars for a prescription or co-pay are required to use the Kamilche Pharmacy. In case of an emergency, during which the pharmacy is not available, the patient may receive medications from an outside facility, but must contact the PRC/CHS office within 72 hours in order to receive reimbursement.

2.5 BEHAVIORAL HEALTH

2.5.1 Hours of Service

The Behavioral Health Program operates under the same hours of service as the Health Clinic listed above in 2.1.1.

2.5.2 Explanation of Services

Mental Health and Substance Abuse Counselors are available for adults and children. The counselors work in the Squaxin Island community using a variety of therapies. Patients are encouraged to establish appointments with or without a referral from their primary care provider.

2.5.3 Eligibility Policy

All Behavioral Health patients must be approved through the Health Clinic's Registration process. The eligibility policy for the behavioral health program is similar to that for the primary care programs listed in 2.1.3., with exceptions for patients referred by the Northwest Indian Treatment Center (per agreement) and for occasional, acute treatment of immediate family members.

2.6 MEDICAL ADVISORY TEAM (MAT)

This team consists of 5 members. The Medical Advisory Team is responsible for guiding Health Clinic policies and services. The MAT also reviews all grievances against the Health Clinic and, in some cases, against members of its staff.

The MAT will meet as needed. Emergency meetings of the MAT may be organized when necessary by the Health Director or another designee of the MAT.

3.0 HEALTH PROGRAMS - Miscellaneous

3.1 Hours of Service

The Health Promotions Programs maintain the same hours of operation as the Health Clinic.

3.2 Explanation of Services

Health Promotion/Disease Prevention

The Squaxin Island Tribe offers a variety of health promotion and disease prevention programs. These programs are designed to encourage healthy lifestyles and prevent the spread of infectious or chronic diseases. Current efforts are being made to reduce the impact of diabetes, tobacco use, breast and cervical cancer, other cancers Hepatitis C and HIV/AIDS in the Squaxin Island community.

Orthodontic program:

As funding allows, Squaxin Island tribal members up to 20 years old with a denial from their insurance or Provider One program.

They must be a patient of record in the Squaxin Island Dental Clinic with a good oral hygiene history and pass two consecutive oral hygiene exams. All restorative needs must be completed.

Disclaimer: These programs will be effective only as funds are available and will be reevaluated annually during the budgeting process.

Naloxone (adopted 5/23/16)

The Pharmacy will provide naloxone to the Police Department and the Behavioral Health Department by prescription from Dr. Ott with no charge. The cost will be charged to the Tribal Health budget. Dr. Ott or (other certified provider) will provide an overview and training on how to administer naloxone.

Suboxone Treatment Program (adopted 12/17/15)

Each of the participating parties will comply with the following requirements:

Patient:

Be an enrolled Squaxin Tribal Member
Be in compliance with a treatment plan at Squaxin Island Behavioral Health
Harassing staff will be grounds for dismissal from treatment

Behavioral Health:

Will ONLY send patients to Dr. Ott they have verified to be enrolled Squaxin Island tribal members (not descendants or community members)

Notify Dr. Ott of status changes and compliance issues

Dr. Ott (or other certified provider):

Remain certified for Suboxone prescribing

Verify tribal enrollment with Medical Front Desk

Notify Behavioral Health of status changes and compliance issues

Chronic Pain Treatment

- Pain contracts and urine screens are required.
- The patient must have an appointment for each refill.
- Behavioral Health will explore ways of managing chronic pain as part of the treatment plan.

Medical Coverage Sponsorship Program

The purpose of this program is to sponsor Medicare and Affordable Health Care Act (ACA) premiums for eligible Squaxin Island Tribal members who are PRC/CHS (Purchased Referred Care/Contract Health Services) eligible and descendants (up to age 19 who live in Mason County). Eligibility requirements are detailed in the Sponsorship Policy.

Medicare Part B:

Medicare Part B is deducted from participants' monthly Social Security benefits. We will reimburse no less than quarterly upon documentation, except initiation of coverage, which may be less than quarterly.

Medicare Part D

Medicare Part D has been an on-going program. We pay Medicare Part D monthly, directly to Humana and only pay for basic coverage. If someone chooses a plan that costs more, they will be responsible for the additional cost.

Affordable Health Care Act

Under the Affordable Health Care Act, the majority of our patients without work related health care insurance qualify for free Expanded Medicaid coverage (Apple). The remainder are eligible for tax-credit subsidized insurance in the Washington Health Care Authority's Marketplace. Because of the complexities of residence, providers covered and patient needs, we will reimburse for premiums monthly. There are no copays or coinsurance in these plans for the members or descendants of federally recognized tribes.

Disclaimer: These programs will be effective only if funds are available and will be reevaluated annually during the budgeting process. *If the ACA is discontinued the program will be reevaluated.*

5.0 FRAUD, WASTE AND ABUSE

All health services and expenditures will be monitored for patterns of fraud, waste, and abuse. If a pattern is noted to be developing, a "stop loss" hold may be placed on that patient's account by

the Health Director until a meeting of the Medical Advisory Team can be convened. While the "stop loss" is in place, no new expenditures or services will be allowed on the patient's account. Patients will be notified in writing when a "stop loss" has been imposed upon their account.

In the event that the MAT determines that fraud, waste or abuse has occurred, the MAT may impose various control measures including, but not limited to, exclusions from specific services, medications, or providers. Fraud, waste or abuse that continues despite imposed restrictions may lead to the temporary or permanent revocation of a patient's PRC/CHS eligibility.

6.0 CONFIDENTIALITY POLICY

The Squaxin Island Health Clinic is in compliance with all federal regulations under the 1996 Health Insurance Portability and Accountability Act (HIPAA). Information regarding patient's health information is regulated using the HIPAA standards. All patients are informed of the HIPAA policies and their rights upon use of the Health Clinic and must sign a form acknowledging acceptance. A full explanation of the act is located with the HIPAA Compliance Officer in the Health Clinic.

All Health Clinic employees receive training in HIPAA compliance within the first 90 days of employment. Employees are also required to sign a "Confidentiality Statement" upon hire which holds them to the strictest confidentiality standards. For any confidentiality concerns against the department or one of its members, please see the Grievance Policy.

7.0 GRIEVANCE POLICY

The Health Clinic strives to continually improve the quality and breadth of services available to the Squaxin Island community and takes seriously all grievances against the department and its staff members and will consider each complaint in a timely and efficient manner.

All client/patient grievances must be submitted in writing to the Health Services Director.

Grievances related to personnel will be reviewed by the next immediate supervisor. These decisions are considered final and cannot be appealed. In no instance will confidential personnel actions be communicated to the client/patient.

Non-personnel related grievances will be reviewed by the Medical Advisory Team at the next scheduled meeting. A written response identifying the conclusions of the MAT to any grievance shall be sent within 30 days of the grievance submission.

An appeal request to a decision made by the MAT must be submitted in writing within 30 days of the decision being appealed, and must describe the decision being appealed and reason for the appeal. Every effort will be made to schedule an appeal meeting within 30 days of the appeal submission. The MAT will render a written decision on the appeal within 15 days of the appeal meeting. The decision of the MAT is the final administrative action.

If a person is unsatisfied with the final decision of the MAT, he/she may appeal that decision to the Tribal Court. Appeals must be submitted to the Tribal Court using the appeals notice form within 10 days of receipt of written notice of the final administrative action. The applicable law

at the appeal hearing will be this Policies and Procedures manual, and any other applicable written law or policy of the Squaxin Island Tribe as they now exist or as they may be amended. The remedies available in the Tribal Court in an appeal under this section shall be limited to injunctive relief. No monetary awards shall be available. The jurisdiction of the Tribal Court in appeals of MAT final administrative actions shall be limited to upholding the decision of the MAT or reversing the MAT where the decision of the MAT is found to be arbitrary, capricious, or unsupported by substantial evidence. The decision of the Tribal Court shall be final and no further appeals shall be available.

8.0 RIGHTS AND RESPONSIBILITIES

8.1 Rights and Responsibilities of the Patient

All Health Clinic staff and providers shall ensure that each patient:

- Is treated in a manner sensitive to individual needs and which promotes dignity and self-respect.
- Has all clinical information and medical/dental files treated in a confidential manner.
- Has the opportunity, upon request, to view patient's own files.
- May ask for an exam room chaperone at any time.
- Is protected from abuse (sexual, financial, physical and mental) by staff at all times.
- Be given the opportunity to express concerns or grievances confidentially.
- Have the right to refuse any treatment and to be informed of the consequences of refusal.

8.2 Rights and Responsibilities of the Employees

Employees of the Squaxin Island Health Clinic have the right to work in a safe environment.

- Patients interacting with Health Clinic employees will treat them with respect and dignity.
- Loud, intimidating, abusive or profane language will not be tolerated.
- Patients displaying any of these behaviors will be asked to leave and may be escorted off the premises by tribal police.
- Similarly, telephone abuse will not be tolerated.
- Abuse that continues despite two prior warnings may result in exclusion of the offender from direct and PRC/CHS services.

For policies that are not specified here, please refer to IHS Portland Area Policies and Procedures or those specified for each individual program.