

2017 ACCESSIBILITY PLAN

ClearPath Clinic

Medically Assisted Treatment & Recovery
A Program of the Center for Alcohol & Drug Treatment

Purpose

The purpose of the Accessibility Plan is to promote accessibility and remove barriers. The ClearPath Clinic addresses accessibility concerns to enhance the quality of life for those served by the Clinic; implement nondiscriminatory employment practices and meet legal and regulatory requirements; and to meet the expectations of stakeholders in the area of accessibility. This report and improvement plan is meant to enhance access to programs, services, facilities, and the community.

Assessment and Practices

In order to assess accessibility, the ClearPath Clinic examined its identification of barriers in the following areas:

- Architectural (physical)
- Environmental
- Attitudinal
- Financial
- Communication
- Transportation
- Community integration
- Technology
- Employment

Any identified barriers to service are addressed through one of the following internal committees:

- Safety Committee
- Quality Improvement Committee

ARCHITECTURAL BARRIERS

The ClearPath Clinic was built out to be compliant with the Americans with Disabilities Act (ADA). Patients park in the parking lot that has an accessible entrance to the facility. The clinic is located in the lower level of the facility and there are stairs to access the clinic. If a patient is not able to use the stairs, there is an elevator available for use in the main lobby. There is an accessible window at the front desk in the Clinic for those individuals in wheelchairs.

Architectural barriers are identified through the incident reporting process or through inspections conducted by the Safety Committee representatives. Alterations are made when possible or referral sources are identified. The stairway does get dirty during winter months due to sand, salt and snow being tracked in on patients' shoes. The ClearPath Clinic did have an incident occur in 2016 when a patient fell on the stairs. The stairway is monitored more closely and cleaned on a more regular basis when reported to be dirty. In 2017, the goal is to have no accidents in the stairway area.

In 2016, as the ClearPath Clinic took on more patients, it became clear that more dosing stations were needed. Not only did the total population of patients increase, but the Clinic also had more patients being prescribed buprenorphine than the average MAT clinic. In 2016, the Clinic had over 50 patients who were prescribed buprenorphine, out of a total of 350 active patients. This is important as it takes longer to dose these patients, which in turn increases wait times to dose. Two additional dosing stations were completed in November of 2016, and were fully operations by the end of the year. The ClearPath Clinic now has 5 dosing stations.

ENVIRONMENTAL BARRIERS

Environmental barriers can be interpreted as any location or characteristic of the setting that compromises, hinders, or impedes service delivery and the benefits to be gained. Some service sites may be located in areas where the person served and/or personnel do not feel safe or feel that confidentiality may be risks. In addition to such external environmental barriers, internal barriers may include noise level, lack of soundproof counseling rooms, and highly trafficked areas used for service delivery. The Program Director will monitor and address these barriers throughout the year.

The Chief Executive Officer (CEO) and Chief Operating Officer (COO) has worked with the local community to ensure that the ClearPath Clinic is located in an area of the city that is most accessible to the patients. The Clinic is located in the same building as the Detoxification Unit and Men's Residential Program; an area in the community already familiar to many of the patients. The ClearPath Clinic is located on the bus line. During 2016, the parking lot at the ClearPath Clinic was utilizing was reduced by half due to another agency building in the area. This has created accessibility issues. There is a staff parking lot behind the building and there is parking for both staff and patients on the street. A parking space is left open by the back door entrance to the Clinic for patients with disabilities in need of quick access to services. The security guard monitors patients entering through the back door entrance. The parking will continue to be evaluated in 2017 as the patient population is expected to increase and solutions will be discussed.

Client confidentiality is a priority at the ClearPath Clinic. There are separate reception areas and locked medical records office for the Clinic. If a patient needs to use the elevator to access the Clinic, he/she needs to go through the lobby area that serves the Detoxification unit and Men's Residential Program. The reception area is secure and staffed at all times.

During 2016, relocation of several of the counselors has occurred to more private office areas. There are still a few counselor office areas that are shared. Counselors can utilize group rooms or other private office areas to meet with patients during times when clinical sessions are occurring with patients. In addition, the ClearPath Clinic was reduced down to two medical exam rooms during the first half of 2016 to accommodate more counselor offices. To improve intake/exam processes, the Clinic has converted the lab room into another exam room. If nursing staff continue to deal with a congested intake/exam waiting area, the Clinic can open a fourth exam room to improve the flow of exams and intakes. Due to limited space and increasing client population, the Clinic will continue to evaluate and make adjustments to the space as needed throughout 2017, to best accommodate private meeting areas for counselors and patients as well as efficiency and space needs of medical staff.

The ClearPath Clinic contracts with a security agency and a security guard is on staff, monitoring both the internal areas of the facility and the grounds surrounding the facility during hours of operation.

ATTITUDINAL BARRIERS

Attitudinal barriers may include the terminology and language that the Clinic uses in its literature or when communicating with patients, other stakeholders, and the public; how patients are viewed and treated by the Clinic, their families and the community; whether or not patient input is solicited and used; and whether or not the eligibility criteria of the Clinic screens out specific individuals or groups of people.

All promotional material and/or policies and procedures are reviewed on an ongoing basis by Management Staff to ensure that bias or potentially offensive language is not present. Mandatory training is provided to all staff members annually that addresses sensitivity to cultural differences. Medication Assisted Treatment trainings continue to be offered during 2017. The Program Director completes community outreach contact on a monthly basis and this will continue on at least a monthly basis throughout 2017. In addition, the CEO completes community outreach contacts on a regular basis that includes education through formal presentations. In 2016, the CEO attended 20 meetings with Essentia Health system to develop principles and a care model for patients on long-term opioid medication who are showing signs or symptoms of an opioid use disorder. The CEO also sits on the system-wide Opioid Oversight Committee to work on implementing a consistent policy for primary care physicians which include access to Suboxone. The ClearPath is proposed as the hub in a hub-and-spoke model to provide

primary care physicians with consultation and problem-solving with their patients. In addition, CADT/ClearPath collaborated on 3 grant proposals: 1) SAMHSA; 2) NIH; and 3) Minnesota DHS. These proposals were designed to obtain grant support for the expansion of MAT within Essentia Health. Similar efforts are underway with Wilderness Health System, which includes St. Luke's Hospital and other unaligned primary care clinics and hospitals in our region. Numerous presentations by CADT staff were made in 2016, including a regional Opioid Summit hosted by Essentia Health for all primary care physicians in their system.

The ClearPath Clinic conducts patient satisfaction surveys with each patient upon admission and then every 6 months following admission to the program. Responses to the survey are reviewed by the Quality Improvement Committee on a quarterly basis. Goals and data regarding the Patient Satisfaction Surveys are included in the performance improvement plan. ClearPath's goal is to maintain a 90% favorable level of patient satisfaction and complaint resolution.

FINANCIAL BARRIERS

The ClearPath Clinic will strive to maintain sufficient funding for the program. Staff and board members of the ClearPath Clinic understand the importance of finances and the direct impact that these finances have on agency personnel, individuals being served, and the community at large. Leadership at the ClearPath Clinic is active in advocating not only at local levels but also at legislative levels for funding increases. ClearPath has a goal to be at a census of 500 patients by July of 2017. ClearPath also has a goal to reach a "break even" point financially as soon as possible in 2017.

The ClearPath Clinic is funded through a per diem rate established by the state of Minnesota and adopted by most health plans for both state sponsored (Medicaid) and commercial products. This rate has been below our "break even" cost at the original design capacity (400 patients). CADT has utilized margins generated by the other programs and services it offers to maintain the operation of the Clinic, while simultaneously working to recruit staff and remodel the Clinic. In 2016, the Clinic added two additional dosing stations to increase total capacity. Demand for services continues to exceed the design capacity, so the market can support this expansion.

A current proposal by the Minnesota Department of Human Services would "unbundle" the per diem rate to allow for separate billing of psychosocial counseling services, depending on the individual level of care. This would enhance the revenue stream and result in a sustainable clinic operation.

The ClearPath Clinic seeks to reduce and/or eliminate financial constraints that may restrict the ability of all eligible patients to access any services consistent with their needs and preferences. Intake staff works closely with financial staff to determine a patient's funding source prior to the start of treatment. Additionally, intake staff works with potential patients offering possible alternative solutions to explore when a patient is having difficulty obtaining funding for treatment.

EMPLOYMENT BARRIERS

The ClearPath Clinic recognizes that the Americans with Disabilities Act (ADA) and its policies prohibit discrimination in all employment practices, including job application procedures, hiring, firing, advancement, compensation, training, and other terms, conditions and privileges of employment. It applies to recruitment, advertising, tenure, layoff, leave, fringe benefits, and all other employment-related activities. The Management Team reviews policies at least annually and updates policies as needed.

The employee's direct supervisor may accommodate a request from an employee for reasonable accommodations to address any disability issues the employee may have. All requests for reasonable accommodations are handled on a case-by-case basis.

All open positions are posted at each CADT facility and on several websites on the Internet, including online employment websites. In 2016, the ClearPath Clinic reached out to colleges in the area to post job openings. Job applications have been modified to ensure they are culturally appropriate and easy to complete. ClearPath has a goal to be fully staffed in all areas by the 2nd quarter of 2017 and remain fully staffed going forward.

There is competition in the area for medical staff, as there are large hospitals that are able to offer higher wages. During 2016, the Clinic had difficulty recruiting LPNs and clinical staff. The entry level wage at the Clinic was raised for both of these categories of employees. The wages of current staff were also reviewed and clinical and medical staff received a wage increase. In 2017, the ClearPath Clinic will explore additional recruiting options as the clinic capacity expands and plans to be fully staffed throughout 2017.

COMMUNICATION BARRIERS

Communication barriers include the absence of telecommunication devices for the deaf (TDD) and the absence of materials in a language or format that is understood by the patient. The ClearPath Clinic currently does not have a TDD. ASL interpreters are available through subcontract. The ClearPath Clinic offers an accessible, user-friendly website that makes it possible to share information about the agency and its programs and services.

Arrangements for foreign language translators are made on an as needed basis.

Any patient that displays learning disabilities will be further evaluated and accommodations will be made to meet the needs of the patient on a case-by-case basis, as need arises.

Staff communication is facilitated through regular meetings, email and in person. A staff meeting schedule is in place for 2017 and minutes are kept for each meeting and shared with all staff. A required reading program was developed for 2017 to better help educate staff on policies and procedures; the effectiveness of this will be evaluated throughout 2017.

TECHNOLOGY BARRIERS

Technology barriers include the evolving technology, the upkeep of equipment, assistive technology, and issues more specific to the populations served. CADT/ClearPath has implemented monthly meetings with the agency subcontracted for IT services, CW Technology, in an effort to address any technology barriers as quickly as possible. In addition, CW Technology IT remote support and Methasoft remote support is available to all staff by phone.

During 2016, CADT received a grant from Arrowhead Health Alliance to install Vidyo, a teleconference system, into several of the CADT sites. Vidyo is also utilized by other community agencies who share the same patients as the ClearPath Clinic. Vidyo was installed in the Clinic during the last quarter of 2016. At this time, payment for services is not available through video conferencing; however, the ClearPath Clinic will continue to explore ways to utilize video conferencing throughout 2017, to optimize patient services and collaborate with community agencies who also utilize Vidyo. This is an ongoing goal which the Clinic will access throughout the year and review in January 2018.

TRANSPORTATION BARRIERS

Transportation barriers include persons being unable to reach service locations or being able to participate in the full range of services, supports, or activities offered. The ClearPath Clinic staff attempts to promote natural supports in meeting transportation needs as well. The Clinic maintains vehicles that are shared with CADT. Counselors work with patients on solutions to any transportation barriers. In cases where solutions to transportation outside of the clinic cannot be arranged for important appointments, patients may request to see if transportation is able to be arranged through ClearPath. The Clinic is located on an established bus line.

Patient Input

In 2016, accessibility satisfaction surveys were administered to patients at the time of intake to the Clinic. These surveys ask several questions pertinent to the topic of accessibility. The results are reviewed on a regular basis. Patients chose not to complete this survey due to the already large amount of paperwork they are completing at time of intake and this survey was removed.

Patients are advised at the time of intake of the process of filing complaints/grievances. All documented complaints/grievances will be handled and resolved as expediently and efficiently as possible to

guarantee the patient is satisfied with the resolution and to correct any possible issues in accordance with the ClearPath Clinic's Grievance Policy (9530.6470-R107). Any trends are noted, reviewed by the Quality Improvement Committee, and steps are taken to rectify any problems.

The Clinic offers a "Patient Quality Improvement" group with managers on a quarterly basis. This is an opportunity for patients to share their concerns and ideas with staff. Feedback from patients will be provided to the Quality Improvement Committee and ClearPath staff to address the legitimate concerns of patients. Patients did not sign up to attend this group in 2016, and ClearPath will continue to work on solutions to encourage patients to sign up, attend and actively participate in this group during 2017. This goal is included in the performance improvement plan also.

Reasonable Accommodation

The ClearPath Clinic subcontracts with agencies and/or individuals to provide necessary specialized services for persons who cannot be accommodated at internal facilities (i.e. dually diagnosed patients – mental illness & developmental disability; patients who need "specialty services – sexual problems or eating disorders; or deaf adults and children in need of psychiatric services).

Leadership and Responsibilities

The Executive Team at the ClearPath Clinic will be the entity responsible for the review of the Accessibility Plan. The Compliance Officer and Program Director will be in charge of the oversight of the Accessibility Plan and task management. The status of the plan will be reviewed annually. The Executive Team is responsible for prioritizing and reviewing the accessibility plan as well as the requests for reasonable accommodations. The Executive Team will evaluate and carefully consider the merits of all requests for accommodation to determine whether any remedial actions are appropriate. All requests will be identified, reviewed, decided upon, and documented. When an agreement has been reached to provide the accommodation, the steps to accommodation may be part of the person's plan. When an accommodation cannot be made, the ClearPath Clinic will demonstrate a referral system that assists the person served, personnel or other stakeholders in the use of other resources that are accessible. Processes can be different for requests from persons served versus those made by staff personnel.

Communication of the Accessibility Plan

The ClearPath Clinic will create an annual report in writing. This report will include progress made in the removal of identified barriers and areas needing improvement. Copies of the Accessibility Plan will be made available upon request to patients, employees, stakeholders, and the public. Alternative formats will be available upon request. In 2017, the Accessibility Plan will be posted to the ClearPath Clinic website, the plan will be reviewed with staff and copies provided to patients and stakeholders via posting in the Clinic and website by February 2018.

Summary

The ClearPath Clinic is active in its attempts to ensure that barriers to service are either nonexistent or minimal through continued self-inspection of facilities, monitoring of annual work plans, and attention to complaints, potential or real barriers can be identified and avoided or mitigated. All barriers noted above are evaluated throughout the year and barriers are responded to as they arise. This plan will be reviewed by the Executive Team in January 2018, and will be updated at that time.