



Hello – My name is Laura McKenzie and I am a Licensed Clinical Social Worker. I work as the Director of Quality Improvement and Risk Management, and Compliance Officer for North Star Behavioral Health.

Mr. Chairman and the Committee – thank you for this opportunity to provide testimony regarding North Star Behavioral Health’s concerns regarding House Bill 214, mental health patient rights and grievances.

I would like to start by stating that North Star has been in business for over 28 years, and provides voluntary behavioral health treatment exclusively for children and adolescents at both our acute hospital, and residential treatment facilities. We welcome external oversight and community agency involvement in our facilities, and fully support our patients having access to grievance procedures.

We view their feedback as an important tool in our performance improvement efforts, and take our responsibilities for their treatment seriously. North Star is committed to providing the children in our facilities and the employees who care for them, a safe environment that complies with, or exceeds all local, state and federal requirements. As part of that culture of safety is continuous monitoring of all patients to prevent the unlikely occurrence of serious events such as sexual or physical abuse which are crimes, not grievances as outlined in this bill.

North Star program(s) are licensed by the State of Alaska, the Center for Medicaid and Medicare Services and accredited by the Joint Commission on Accreditation of Health Care Organizations. Monitoring is also conducted by external organizations such as the Disability Law Center, State of Alaska Office of Children's Services, the Division of Behavioral Health, and the Division of Juvenile Justice. Additionally inherent with treating children, each patient has one or more of the following who monitor and participate in care: parents, family, Guardian Ad Litem(s), Social Workers, external community treatment providers and school personnel. One can surmise from reviewing all involved parties that multiple levels of monitoring and or investigation are already in place.

As part of the requirements for licensure and operation we must have a grievance procedure that is patient friendly, efficient, and responsive to concerns. You have previously heard testimony that behavioral health patients do not have rights, or have fewer rights than prisoners. This is not accurate as patients at North Star have rights in 30 different categories, just like adults in other hospitals. We maintain a vigorous program that is written into policy and shared at multiple points. Information about this process is given to every patient and parent upon admission as part of the intake paperwork, and also in the parent or patient handbook. Additionally, we have this information posted on every unit, and groups regarding rights and grievance procedures are held with the patients. We have a designated Patient Advocate who is responsible for responding to grievances. We have installed locked boxes on each unit so that patients can submit concerns directly to the Advocate. The Advocate's picture is even on the box to assist patients with identifying him when making a complaint. We have

additional management staff trained and available during times the Advocate is not on duty to assure continuous access to this process at all times. Additionally, we provide the contact information for State of AK Facilities Licensing, Disability Law Center, and the Joint Commission to all employees as part of orientation; it is printed in the patient and parent handbook and it is posted on our website.

Complaints are investigated and a written response is given within a couple of days, not 2 weeks as previous testimony would allege. Parents/guardians and other support systems are involved in all aspects of treatment, and that includes complaint resolution. Concerns are then reviewed each month for trends and opportunities to improve by the Quality Council, Medical Executive Committee, and the Governing Board each quarter. Additional review of the complaint data is done by external agencies during annual, tri-annual and unannounced regulatory surveys. Inquiries and surveys in response to complaints are not uncommon, and can last up to four days while involving multiple departments.

A complaint received last month from a patient stated: "wake up time is too early on the weekends." This is a typical complaint we receive and clearly would not rise to the level necessitating investigation and response by an external party. Another point worth discussion is the inherent benefit of having an internal advocate who can investigate and work with the clinical team to address concerns, thus preventing triangulation and preserving the therapeutic alliance between patient and treatment team. Please note, that all patients are admitted to North Star on a voluntary basis and with the consent of their parent who can discharge their child at any time of they are unhappy.

As you can see, a patient receiving treatment at North Star Behavioral Health already has the participation of up to ten separate agencies and entities. It is questionable, how the addition of the process outlined in this bill will add value. HB 214 is unnecessary, redundant, and an inefficient use of resources given the onerous regulations and oversight already provided to health care facilities. I am available to answer any questions that the committee may have.

Thank you