



Policies and Procedures: Are Yours What They Need to Be?

By Pamela Gustafson

Executive Summary

The fundamental controls for an organization are its policies and procedures. It is through these that management sets their intent and guides their employees in the execution of their duties. As important as policies and procedures are, there is a tendency in many companies to fail to keep them current with regulations, standards and evidence-based best practice, whether administrative or clinical.

To be effective, policies and procedures require certain components, and managers need to know how to approach the development, communication, and management of these essential controls. This article assists auditors in evaluating the quality and value-added aspects of policies and procedures.

Policies and procedures. Just the words can induce a visceral reaction, a combination groan and eye-roll, that reflects the challenges most organizations face with policy and procedure management. Such a reaction is understandable, because policy and procedure management in hospitals is often onerous and confusing. Policies span the organization and touch every department and function. Yet, the process often has no single owner or standardized methodology.

When it comes to policy and procedure management, hospitals tend to suffer from the silo effect, a common problem in decentralized organizations. When each manager or department-head is responsible for his or her own individual policies and procedures, the result is a process that reflects individual preferences for format and content and a haphazard approach to the policy and procedure management process.

The lack of cohesiveness is especially challenging for auditors, a group for whom an organization's policies and procedures are a fundamental tool. Often, one of the first steps in an auditor's fieldwork is gathering relevant policies and procedures. So how do you determine what makes a good policy? How do you know which policies and

procedures are must-haves? And what best practices exist to harness policy and procedure management, transforming them from an administrative burden into a strategic tool? My article addresses these questions and also provides insight into the key components of an automated policy and procedure management system.

What are policies and procedures?

A policy is a rule or guideline that directs action. Policies are dictated by patient-care processes, administrative processes, regulations, and/or accreditation organization standards. They are typically high-level statements of what has to be done.

Procedures are the step-by-step instructions, the "directions" for how a policy should be implemented. One policy can include different sets of procedures that are specific to work requirements, departments, and personnel. Policy statements usually remain consistent, while procedures can change more often and must reflect current practice and/or regulations.

For example, a policy and procedure addressing care of the latex-sensitive patient will have one policy statement that is consistent across the organization:

The hospital will ensure that latex-sensitive patients will not come into contact with products made of latex.

However, the procedures for implementing this policy will vary based on an individual's role in the hospital:

- Procedures specific to non-urgent admissions :
 - Ask patient about any allergies, including latex sensitivities.
 - Appropriately document on the medical record any latex sensitivities.
 - Fulfill any other allergy documentation required by the organization.
- Procedures specific to nursing:
 - Only use equipment and supplies designated latex free or from latex free cart.
 - Ensure "Latex Allergy" sign is posted in patient's room.
 - Monitor the patient for any signs of an allergic reaction, such as rash, hives, eye tearing/itching, wheezing, shortness of breath, nausea, vomiting, faintness, etc.

Key components for all policies and procedures

One of the challenges in policy and procedure management is that there is no single reference source that outlines the required elements of a hospital policy and procedure manual. Because of this, and due to inconsistent policy and procedure development within hospitals, you often encounter policies and procedures that are inconsistent across the organization.

How then, do you know, when reviewing a policy and procedure, if they are

adequate? The characteristics to look for in good policies and procedures are clarity, conciseness, and straightforward reading. They should not contain information that easily becomes outdated, such as phone numbers or email addresses. They should only use abbreviations that are approved by the organization.

What makes for good content?

There are numerous sources that can contribute to the content of policies and procedures. Mainly, policies and procedures should be created from clinical

and administrative evidenced-based best practice, and rely on professionally accepted sources, such as:

- Medical evidence
- Professional practice organizations
- Centers for Disease Control and Prevention (CDC)
- Agency for Healthcare Research Quality (AHRQ)
- Food and Drug Administration (FDA)

Additionally, federal and state regulatory agencies contribute to the

content of a policy, including, but not limited to:

- Centers for Medicare and Medicaid Services (CMS)
- Health Information Portability and Accountability Act (HIPAA)
- Occupational Safety and Health Administration (OSHA)
- Federal Trade Commission's (FTC)
- State licensing agencies and State Health Departments

Lastly, hospital accreditation organizations, such as The Joint Commission, DNV Healthcare, and the American Osteopathic Association, have standards and requirements that will contribute to policy content by outlining requirements for accreditation.

Policies and procedures should contain the following components:

Manual Title

The name of each policy manual in which the policy and procedure resides.

Policy Title

The policy title should be brief and descriptive.

Policy Statement

A statement of the rule or guideline; a policy statement does not go into any detail about how the policy will be implemented.

Purpose

A statement of the purpose of the policy and procedure. Sometimes this is addressed in the policy statement and, therefore, a purpose description is unnecessary.

Definitions

Include definitions of terms that may be confusing or unclear.

Procedure

The step-by-step instructions that detail how the policy is implemented; procedures should include any required equipment. The procedure section may refer the user to a hospital-approved resource, such as a nursing practice and procedure textbook.

References/Cross References

Federal and state laws and regulations, accreditation organization standards, clinical evidence, or other references that are directly applicable to the procedure. Links to relevant evidence/forms/charts might also be included here.

Page number(s)

Each policy and procedure should be individually numbered. Page numbering policies and procedures can be tricky. A policy should be a self-contained document; its numbering should be included on the policy and may be placed in either the header or footer of the document.

External Link(s)

Links to external information sources are useful.

Dates

The date should include the initial approval date and any subsequent review dates. In electronic systems this information would be stored and auditors would have access to the document history. Policies and procedures should not include expiration dates, but should include review periods. The organization should have a system in place to review policies as determined by regulations or organization policy.

Owner/Policy Authorization

Ideally, a policy will have a person or department that *owns* the policy. That person or department is available to interpret the policy and address any questions. The authorizing individual can be noted on the individual policies or within the manual as a whole.

Necessary policies and procedures

Hospital policies and procedures will vary depending on the type of organization, the population served, the state and federal programs in which the hospital participates, and the accreditation organization(s) your healthcare organization uses.

Development and management of policies is important

A centralized, comprehensive development and management of policy and procedure is fundamental to providing consistent communication, minimization of compliance risks and ensuring patient safety. The benefits are:

It is efficient, thereby freeing personnel to spend more time providing patient care.

It increases the likelihood of personnel using policies and procedure because they easily find what they need.

It reduces duplication of policies and procedures across departments, ensuring consistent care is provided to all patients.

Various approaches to the development and management of policies can be taken. These range from designated committees to departmental approaches that include upstream communication and approval.

The deployment of vendor software products with pre-developed policies and procedures that can be adapted to fit your organization can reduce the workload of those charged with developing and managing organization policies.

In addition to format and content, the distribution and communication of policies and procedures throughout the organization are fundamental to the policy and procedure management process. Proper communication ensures the consistent delivery of safe and effective patient care as well as various administrative activities that will help minimize risk and ensure compliance. Use of an automated system will greatly assist with the effective and efficient communication of policies and procedures to employees.

Automation—the wave of the future

Clearly, moving from a manual paper process to an automated policy and procedure management system is a logical step for hospitals.

When looking for an automated system to manage your policies and procedures, there are some key attributes that you should expect to see in the software.

Policies and procedures are tools that can prevent and/or mitigate risk. The goal of every policy and procedure is to ensure the intent of management regarding provision of safe and effective care, treatment, and service. Policies and procedures are also concrete ways to demonstrate compliance with regulatory requirements and accreditation body standards.

Regardless of format or the manner by which they are maintained, a policy and procedure manual must reflect operational practice. What the nurse on the floor or the clerk in the billing office is actually doing must be reflected through the written policy and procedure. A policy and procedure manual that is not reflective of approved operational practice does not add value and can place the organization at risk.

The benefits of an automated process are:

- A centralized policy library
- Reduction of compliance risk
- Policy and Procedure tracking
- Policy and Procedure revision archive
- Audit trails
- Improved intra-department communication
- Survey-readiness

Every hospital will want comprehensive policies and procedures that include:

- Organization-wide administrative and clinical policies that address:
 - Environment of Care (safety and security, hazmat, emergency management and preparedness)
 - Information Management (HIPAA, acceptable abbreviation-use, release of information, medical record management)
 - Corporate Compliance (including all Office of Inspector General-identified risk areas)
 - Finance
 - Patient Care
 - Patient Rights
 - Infection Prevention and Control
 - Human Resources
- Department-specific policies
- Patient-care policies that are department specific

Summary

Policies and procedures do not need to be onerous, difficult, or confusing. In fact, shifting your perception of the policy and procedure process can result in enhanced operational efficiencies and audit capabilities.

Often, in an effort to comply with every regulation and guideline, organizations throw together policies simply so they can

say the policy exists. The problem with this understandable, though dangerous practice, is the disparity that develops between the policy and/or practice. I am sure you have been in the position of asking someone about a policy and hearing “I’m not sure what the policy says, this is just how we do it.”

Automation is the ideal way to help discourage policy and practice



Key attributes of software to manage policies and procedures should include:

- User-friendly implementation
- Ease of maintenance
- Simple process for importing and uploading existing policies and procedures
- On-line access that does not require on-site dedicated IT resources for support
- Edit, share and workflow approval functions
- Clear, easy training
- A tiered system for users which creates different levels of access and control
- Links to regulations, related policies and procedures, external evidence
- Automated archiving
- Compliance features, such as user comprehension testing

Policy and Procedure Evaluation Checklist

A simple four-point checklist can be used to conduct an initial evaluation of a policy and procedure manual.

1. Is it easily accessible?
2. Is it easily readable & understandable?
3. Does it reflect the governing regulation, the standard, and/or evidenced-based clinical practice?
4. Is it consistent with operational practice?

disparities. Auditors can and should contribute to their organization's evaluation and selection of an automated policy and procedure management system. Given how important accessible, comprehensive, and accurate policies and procedures are to their work, auditors are in a unique position to evaluate such systems; using the criteria outlined in this article will assist in the automated system evaluation and selection process.

Additionally, using the simple four-step checklist provided, an auditor can conduct an easy initial evaluation of any policy and procedure which will assist in determining their value and utility. **NP**

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