

ST. CLAIR COUNTY COMMUNITY MENTAL HEALTH AUTHORITY

BOARD POLICY

Date Issued **1/23**

Page **1**

CHAPTER Administrative	CHAPTER 01	SECTION 001	SUBJECT 0040
SECTION Governance	SUBJECT Policy and Procedures Committee: Policy/Administrative Procedure and Forms Development and Review		
WRITTEN BY Peg Lawton	REVISED BY Latina K. Cates	AUTHORIZED BY SCCCMHA Board	

I. **APPLICATION:**

- SCCCMHA Board
- SCCCMHA Providers & Subcontractors
- Direct Operated Programs
- Community Agency Contractors
- Residential Programs
- Specialized Foster Care

II. **POLICY STATEMENT:**

It shall be the policy of the St. Clair Community Mental Health Authority (SCCCMHA) Board to issue agency policy. Policies are to adhere to applicable federal and state laws, regulatory body requirements e.g. Michigan Department of Health and Human Services (MDHHS), Commission on Accreditation Rehabilitation Facilities (CARF), etc., and applicable contract requirements and have a formal process for policy development, review and revision as outlined below.

III. **DEFINITIONS:**

- A. **Application:** For purposes of this policy, it identifies whom the policy governs, and who is to receive a copy of the policy.
- B. **Form:** A document used to gather and/or provide specific information, which may be required, to attain or release information or a service. Some forms require signature(s) and date.
- C. **Policy:** A document that contains the Board's policy statement, definitions, standards, procedures, and applicable references and exhibits.
- D. **Policy Statement:** Establishes a principle or position regarding a specific matter adopted by the Board.
- E. **Procedure a.k.a. administrative procedures:** The actions taken by designated individuals, with specific steps and responsibilities that operationalizes the Board's policy statement.
- F. **Purpose Statement:** This item identifies the need or reason for the Administrative Procedure.
- G. **Standard:** An authoritative directive (law, rule, regulation, requirement, or good business practice) establishing an expectation of particular conduct or procedure.

CHAPTER Administrative	CHAPTER 01	SECTION 001	SUBJECT 0040
SECTION Governance	SUBJECT Policy and Procedures Committee: Policy/Administrative Procedures and Forms Development and Review		

IV. STANDARDS:

- A. Policies should provide direction, legal framework, and operational standards that impact the entities identified in the policy application.
- B. Policies shall have a standardized format that includes sections for: application, policy statement, definitions, standards, procedures, and if applicable references and exhibits.
- C. Administrative Procedures shall have a standardized format that includes sections for: application, purpose statement, definitions, standards, procedures, and if applicable references and exhibits.
- D. Policy review shall take place annually and will include review by SCCCMHA Board Members and staff, contract providers, individuals served, and their family members.
- E. Administrative Procedures review shall take place annually and will include review by staff, contract providers, individuals served, and their family members.
- F. SCCCMHA Board reserves the right either prospectively or retrospectively to review any policy or administrative procedure at any time. Moreover, it reserves the right to add or delete policies to the Provider Manual as it deems necessary to achieve SCCCMHA desired ends and outcomes. SCCCMHA policies and administrative procedures are divided into nine (9) major categories:

- 01 Administrative
 1. Governance
 2. Operations
 3. Provider Management
- 02 Access to Services
 - 001 Access
 - 002 Customer Service
 - 003 Utilization Management
- 03 Service Delivery
 - 001 Treatment
 - 002 Records
 - 003 Client Services
- 04 Health/Medical
 - 001 Drugs and Medications
 - 002 Health Care
 - 003 Residential and Day Programs
- 05 Recipient Rights
 - 001 Recipient Rights
 - 002 SUD Recipient Rights
 - 003 Individual Rights

CHAPTER	CHAPTER	SECTION	SUBJECT
Administrative	01	001	0040
SECTION	SUBJECT		
Governance	Policy and Procedures Committee: Policy/Administrative Procedures and Forms Development and Review		

- 06 Human Resources
 - 001 Personnel
 - 002 Training
- 07 Fiscal Management
 - 001 Budget
 - 002 Accounting
 - 003 Reimbursement
- 08 Information Management
 - 001 Information Systems
 - 002 Data Management
- 09 Facilities
 - 001 Building
 - 002 Transportation
 - 003 Safety

- G. SCCCMHA shall commission the Policy and Procedures Committee to conduct policy and procedure activities. The Committee Core Membership shall include representation from the following areas: Chairperson (appointed by SCCCMHA Director); Administrative Services; Adult and Family Services; Finance; Human Resources; Information Management; Medical; Recipient Rights; Support Services; Facilities.
- H. Committee members who miss three (3) meetings of the committee within a one-year period are subject to appropriate action determined by the Chairperson, which include the option of obtaining a replacement of the individual.
- I. The Committee shall meet every other month to develop, review and finalize policies/administrative procedures through discussion and action.
- J. A “Special Issue Policy” or “Special Issue Administrative Procedure” shall be implemented when Management / Administration determines that due to a MDHHS Directive, new law, or a change in agency position, etc., a new policy needs to be issued immediately.
- K. The Chief Executive Officer/designee may issue an “Administrative Directive” when necessary to convey a change in standards and/or procedures in any agency policy/administrative procedure. Change(s) must be written in the Administrative Directive, including reference to the specific section, letter, and number (as applicable) of what is changing via the Directive. The Administrative Directive will be an attachment to the policy/administrative procedure, which now includes the change(s) as set forth in the directive, and will stand in lieu of a complete policy/administrative procedure review until scheduled for the next review at which time it will be incorporated and the Administrative Directive is removed.
- L. Forms may or may not be part of a policy/administrative procedure. Forms that are included are reviewed annually by the Policy and Procedure Committee. Form development and implementation must go to the Form Committee for approval prior to implementation.

CHAPTER	CHAPTER	SECTION	SUBJECT
Administrative	01	001	0040
SECTION Governance	SUBJECT Policy and Procedures Committee: Policy/Administrative Procedures and Forms Development and Review		

M. All forms will use a standardized heading and font. Forms to include a form number, issue and revision dates, policy/administrative procedure reference, when applicable, a file path, and /or an Electronic Health Record path.

N. All Forms on the Forms Index and in OASIS are reviewed annually.

V. PROCEDURES:

A. **Policy/Administrative Procedure Development Process**

Person Drafting / Reviewing Policy/Administrative Procedure

1. Drafts policy and administrative procedure using standard Format (See Policy Committee binder) and "Policy Drafting and Review Guidelines" (Exhibit A).
2. Forwards new policies and administrative procedures to committee Chairperson who assigns a number and assigns the policy/administrative procedure to committee member.
3. Makes revisions on the computer using "Track Changes".
4. Completes a "Required Review Sheet" (Exhibit B) on each policy/administrative procedure that are newly written, reviewed, revised, or proposed for deletion, as part of presentation.

Committee Member

5. Ensures policy/administrative procedure is on next Policy Committee agenda.

B. **Policy/Administrative Procedure Review Process**

Committee Support Staff

1. Forwards the scheduled Board policies the Executive Secretary and IT Technician on the Thursday before the Board Meeting and when appropriate (usually 3 to 7 business days) forwards Board feedback to the assigned Policy Committee Member, as applicable.

Policy Committee

2. Reviews scheduled policies/administrative procedures (reviewed, revised, delete, and new), at Committee meeting.

Committee Support Staff

CHAPTER Administrative	CHAPTER 01	SECTION 001	SUBJECT 0040
SECTION Governance	SUBJECT Policy and Procedures Committee: Policy/Administrative Procedures and Forms Development and Review		

3. Forwards all clinically related proposed policies/administrative procedures to the Advisory Councils for review, and when applicable forwards Advisory Council feedback to the assigned Policy Committee member.
4. Posts policies/administrative procedures to be reviewed on SCCCMHA website and sends notice to system that they are available for two-week system-wide review.

Staff Member / Contract Providers

5. Reviews Policy Review Packet by accessing on the SCCCMHA website.
6. Forwards feedback to designated Policy Committee member by due date.

Policy Committee Member

7. Receives feedback on policies/administrative procedures and determines whether to incorporate recommended changes.
8. Re-presents policy/administrative procedure to Policy Committee at next scheduled meeting if substantive changes have been made based on feedback received. In those cases, an additional two week system-wide review period may occur before being final-issued.
9. Saves in Final Committee Folder all policies/administrative procedures presented at committee in their final state: new policies/administrative procedures, final drafts, policies/administrative procedures without changes, and those proposed for deletion.

C. Policy/Administrative Procedures Approval/Final Issue

Committee Support Staff

1. Prepares finalized policies/administrative procedures for approval by Board and/or Executive Director/designee.
2. Issues approved finalized policy/administrative procedure by posting on SCCCMHA website and informing the system (staff and contract providers) via an email.
3. Updates Table of Contents and Policy/Administrative Procedures Database.

D. Form Implementation and Review

Staff

1. Completes a Request to Create, Modify or Delete a Form, form #284.

CHAPTER Administrative	CHAPTER 01	SECTION 001	SUBJECT 0040
SECTION Governance	SUBJECT Policy and Procedures Committee: Policy/Administrative Procedures and Forms Development and Review		

2. Submits Request to Create, Modify or Delete a Form with a draft Word Format (if this is a new form) OR most recent version of the form to modify or delete an existing form.

E. Forms Committee Chairperson/Designee

1. Acknowledges receipt of form #284.
2. Adds request to Forms Committee agenda for processing.
3. Ensures a response is sent to requesting party within two weeks from acknowledgment date.
4. Ensures new, modified or deleted form is updated on the Forms Index and in OASIS.
5. Informs staff of availability of new/revised form.

VI. REFERENCES:

None Available

VII. EXHIBITS:

- A. Policy Drafting and Review Guidelines
- B. Review Sheet

VIII. REVISION HISTORY:

Dates issued 11/02, 06/05, 05/08, 09/11, 01/13, 01/14, 01/15, 01/16, 01/17, 01/18, 01/19, 01/20, 01/21, 2/22.

Policy Drafting and Review Guidelines

1. **HEADER INFORMATION:** When completing this section of the policy, refer to the Table of Contents to determine the appropriateness of selecting these titles.

- Chapter 01 ADMINISTRATIVE
 - 001 Governance
 - 002 Operations
 - 003 Provider Management

- Chapter 02 ACCESS TO SERVICE
 - 001 Access
 - 002 Customer Services
 - 003 Utilization Management

- Chapter 03 SERVICE DELIVERY
 - 001 Treatment
 - 002 Records
 - 003 Client Services

- Chapter 04 HEALTH/MEDICAL
 - 001 Drugs and Medicine
 - 002 Health Care
 - 003 Residential and Day Programs

- Chapter 05 RECIPIENT RIGHTS
 - 001 Recipient Rights
 - 002 SUD Recipient Rights
 - 003 Individual Rights

- Chapter 06 HUMAN RESOURCES
 - 001 Personnel
 - 002 Training

- Chapter 07 FISCAL MANAGEMENT
 - 001 Budget
 - 002 Accounting
 - 003 Reimbursement

- Chapter 08 INFORMATION MANAGEMENT
 - 001 Information Systems
 - 002 Data Management

- Chapter 09 FACILITIES
 - 001 Building
 - 002 Transportation
 - 003 Safety

2. **APPLICATION:** Identifies to whom the policy/administrative procedure is sent and/or who should read/review. Check the appropriate boxes that indicate to whom this policy/administrative procedure should apply.

3. **POLICY STATEMENT:** This should be a brief statement that expresses the Board's position on the subject matter of the policy. This should begin with "It shall be the policy of" The actual statement of position should follow this. If there is more than one position statement, they should be identified separately by "A.... B ... ", however, this is not usually recommended.
4. **PURPOSE STATEMENT:** This should be a brief statement that explains the need or reason for the administrative procedure.
5. **DEFINITIONS:** These statements indicate the meaning of a word, phrase, or title. Whenever possible, definitions should be consistent when used throughout various policies/administrative procedures. The writer should refer to other policies/administrative procedures that may contain the definition. Definitions should never be in contradiction with authoritative definitions, e.g., definitions provided within the Mental Health Code, etc. Definitions are not required and should be included only when it is absolutely necessary to understand/implement the procedures. When definitions are used, they should be listed alphabetically.
6. **STANDARDS:** These authoritative statements establish the criteria or parameters within which the procedures are written. The source of the standards could be internal and therefore an extension of the policy or purpose statement, or the source could be external. Standards are an optional item. They should be included only when it is absolutely necessary to understand or implement the procedures; or as a reference of standards that are mandated by an outside inaccessible source. This section should NOT include procedures.
7. **PROCEDURES:** This section describes the actions that should be taken to implement the policy/administrative procedure. It clearly identifies "Who" is responsible for some action. The section numerically identifies what action should be taken and therefore, to be consistent, should ALWAYS begin with a verb. Writers should avoid putting too many tasks under one step. Procedural statements should be simple and brief. If there is a need to clarify further by referencing another policy/administrative procedure or special circumstance, the writer should, within the procedures section, indicate this by using "NOTE:...." or "SPECIAL NOTE:...." If other policies/administrative procedures are referenced, both the title and number should be indicated. When exhibits are referenced, they should be referenced in order (Exhibit A, Exhibit B, etc.).

There are two (2) other options for drafting within the procedural section. If the policy/administrative procedures involves more than one set of procedural steps, these should be separated by "A....", "B ... "; the numbering of steps would start over within each sub-procedural area. In addition, if a procedure is particularly complicated, or a detailed concurrent procedure, the writer could indicate as a procedural step "Follows the procedures established in Exhibit A." The Exhibit would then outline procedures.

8. **REFERENCES:** Authoritative laws, rules, guidelines, regulating bodies, etc., that drive the policy/administrative procedure. Some examples include Michigan Compiled Laws, MDHHS, Mental Health Code, Medicaid Manual, CARF, etc.
9. **EXHIBITS:** All exhibits to a policy/administrative procedure must be labeled. They should be alphabetical, with numerical indicators if needed, e.g., A-1, A-2, B, C, etc.... The writer, when changing an exhibit, should keep in mind whether or not the exhibit is contained in other policies/administrative procedures. The subject matter of exhibits should not contain material that frequently changes (e.g., staff names should not be used, rather that person's title).

POLICY/ADMINISTRATIVE PROCEDURE REVIEW SHEET

Name of Reviewer:

Title and Number of Policy/Administrative Procedure Being Reviewed:

1. The policy/administrative procedures is: required needed proposed for deletion
Give rationale (include Code or Rule reference, etc.):

2. Is application accurate, as far as you know?

Yes No

Check all entities to which policy applies:

- SCCCMHA Board
 SCCCMHA Providers & Subcontractors
 Direct Operated Programs
 Community Agency Contractors
 Residential Programs
 Specialized Foster Care

Is Chapter and Section Number still appropriate? Yes No

Recommended Changes:

Yes No; Name suggested:

3. Is the name user friendly?

4. In reviewing this policy/administrative procedure, did you consult with anyone? Yes No;
List with whom:

5. Is special review required for this policy/administrative procedure: Yes No

By:

- | | | |
|---|--|--|
| <input type="checkbox"/> Finance | <input type="checkbox"/> Compliance | <input type="checkbox"/> Professional Discipline |
| <input type="checkbox"/> Customer Relations | <input type="checkbox"/> Information Systems | <input type="checkbox"/> Recipient Rights Office |
| <input type="checkbox"/> Quality Management | <input type="checkbox"/> SCCCMHA Board | <input type="checkbox"/> Advisory Council |
| <input type="checkbox"/> Utilization Management | <input type="checkbox"/> | <input type="checkbox"/> <u>Other:</u> |

6. Are any of the forms/exhibits in the administrative procedures in other policies/administrative procedures or case records? Yes No

If so, please reference the policy/administrative procedure or form, etc.:

7. **What are the significant changes being proposed to this policy/administrative procedure and why?**

POLICY/ADMINISTRATIVE PROCEDURE (Name & #) BEING REVIEWED:

Send FEEDBACK To Policy Member:

Email Address:

FEEDBACK Due Date:

INSTRUCTIONS:

- 1) Review the policy/administrative procedures.
- 2) Provide written feedback and/or suggested language changes on this sheet or on the policy/administrative procedure.
- 3) NOTE: It is the Policy Committee's intent to notify each staff as to the disposition of his/her comments/suggestions.

NAME	PAGE #(S) COMMENTED ON	COMMENTS/LANGUAGE CHANGES