

COMMUNITY MENTAL HEALTH PARTNERSHIP OF SOUTHEASTERN MICHIGAN		<i>Policy and Procedure</i>	
Department: Compliance Author: Suzanne Kapica		<i>Affiliation Policy and Procedures Process</i>	
		Local Policy Number (if used)	
Revision Date	Approval Date 11/21/06	Implementation Date	
Archive Information			
Date:			
Reason:			

I. PURPOSE

The purpose of this policy is to define the process and criteria used for determining the creation, collaboration, approval, dissemination and tracking of affiliation policies and procedures while ensuring that the policies align with the vision, mission and strategic plan of the Affiliation.

II. POLICY

To ensure consistency and efficiency in outlined prescribed clerical or administrative practices and functions within the CMHPSM (Affiliation), policies and procedures will be developed and adopted by the members of the CMHPSM according to the following standards, exhibits, references and procedures. The only exception shall be those situations in which the members agree that procedures may be developed locally. This process is to define the process so that all of the necessary input from stake holders is obtained to ensure approval.

III. APPLICATION

This policy applies to the Comprehensive Specialty Services Networks (CSSN's), the Comprehensive Specialty Services Network (CSSN) look-alike and the Prepaid Inpatient Health Plan (PIHP) within the Community Mental Health Partnership of Southeast Michigan (CMHPSM).

IV. DEFINITIONS

Author: The person responsible for obtaining input and writing the policy/procedure and routing the document through the defined steps of this procedure.

Local Affiliate Point Person: The appointed person from each affiliate designated as the responsible person for ensuring that the policy/procedure is routed through the defined steps of this procedure.

PIHP Point Person: The appointed person from the PIHP designated as the responsible person for ensuring that the policy/procedure is routed through the defined steps of this procedure.

Implementation Date: This is the date that is assigned to the policy of when the policy/procedure will be in full operational compliance across the affiliation.

Affiliation: The CMHP of Southeast Michigan composed of Lenawee; Livingston; Monroe and Washtenaw counties (CSSN's/Look-alikes and PIHP).

Policy: A high-level overall plan embracing the general goals and acceptable procedures especially of a governmental body.

Procedure: A series of steps followed in a regular definite order.

V. STANDARDS

- A. The Affiliation Executive Committee (AEC) can determine if an Affiliation policy should be created. If a committee recommends that a policy should be created, AEC will make the determination.
- B. All affiliation policies shall be reviewed and approved on a 3 year schedule to ensure the policy reflects the current practice, unless an earlier review is warranted due to significant changes in practice, regulatory or legislative changes.
- C. The PIHP shall keep a Policy Review Schedule that is shared with each affiliate partner. Changes to the date for affiliation policy review shall be negotiated between the affiliate point person and the PIHP point person.
- D. Each affiliate partner shall ensure local input from individuals, departments, individual management teams, or other stakeholders-prior the approval of the policy/procedure.
- E. The author of the policy is responsible for citing all related policies (cross-checking) regulatory or compliance standards.
- F. The author of the policy shall be responsible for creating **it** in the affiliation approved template, using Arial 11 Pitch Font, 1 inch margins with page numbers (i.e. page 6 of 6) located in the bottom of the policy.
- G. When applicable, to ensure implementation of policy/procedures, the author will create a flow chart to accompany a policy/procedure.
- H. The author is responsible for fully completing all steps within the policy/procedure development process and completing a board action form when presenting to the AEC and the Regional Subcommittee of the WCHO board.
- I. All affiliation policies/procedures shall use general terms to describe the multiple titles of employees who may carry out the implementation of the policy.

- J. Any policy that combines already existing policies shall identify policies to be rescinded.
- K. All changes shall be made using the strike/bold method so that reviewing bodies can see what specific changes have been made.
- L. The author shall be responsible for presenting the affiliation policy/procedure to the AEC and Regional Subcommittee of the board for approval.
- M. Should an affiliate board raise a significant issue regarding an affiliation policy/procedure, the director or designee of that affiliate must present the issue to the Affiliation Executive Committee (AEC) for review. If concerns are expressed by an affiliate board, the board shall be responsible for presenting options that would alleviate the barriers being presented. The AEC shall accept or deny the change and notify the author of the change and re-present it to the board for approval. If denied the director or designee from the affiliate with the issue will present it back to the affiliate board with the reason for denial.
- N. All affiliation policies/procedures once approved by the Washtenaw Community Health Organization (WCHO) board, shall be presented to each affiliate approving entity to adopt and implement the affiliation policy/procedure.

VI. EXHIBITS

- A. CMHPSM Policy Template
- B. Regional Author Policy Flow Checklist
- C. Policy Flow Chart

VI. REFERENCES

Reference:	Check if applies:	Standard Numbers:
JCAHO- Behavioral Health Standards	X	LD 3.90
PIHP Policy Review Schedule	X	
Affiliation Policy Tracking Form	X	
Local Policy tracking template	X	
WCHO Policy tracking template	X	

VII. PROCEDURES

CMHPSM Procedures

WHO

DOES WHAT

DRAFTING/REVISION STAGE

Committee/Individual/Other Is notified or determines that a policy and or procedure must be created or revised for the affiliation.

The committee coach will present the policy need to Affiliation Executive Committee (AEC) to seek approval for the addition of a new policy.

The Committee/Individual or other identifies the primary author of the policy/procedure.

Waits for AEC decision of approval or decline.

Committee Coach

Presents the policy to be created and reasons for it to the AEC for group approval or decline.

Reports back to the committee on the decision.

Author

Notifies the PIHP point person that a new policy/procedure is being developed and the expected timeframe for completion.

Obtains and uses the Author Policy Flow sheet Checklist as needed.

PIHP Point Person

Begins to track the progression of the policy once notified by the author.

Notifies the affiliate point persons that a policy is starting through the development process.

Author

Obtains official policy template from the PIHP Policy format specialist. (Policy format specialist will send latest version of the past policy in the newest template.)

Ensures that all compliance related standards are obtained and incorporated into the policy/procedure.

Collects and incorporates all necessary information from stakeholders that may be impacted by the policy/procedure.

Forward draft policy/procedure to the PIHP point person.

REVIEW STAGE

PIHP Point Person

Forwards the draft policy/procedure to the affiliate point persons.

Provides to the affiliate point person dates of when review should be completed by, the author of the draft policy/procedure.

Documents in tracking system when policy was forwarded to each affiliate.

Affiliate Point Persons	<p>Forward draft policy/procedure on to the affiliate management teams within the necessary timeframe.</p> <p>If a new time frame is identified, contacts the PIHP point person with new timeframe.</p>
Affiliate and PIHP Management Teams	<p>Review the draft policy/procedures and provide any feedback.</p> <p>During this review, if the author is not present, will identify a person to collect the feedback obtained to forward to the affiliate point person.</p> <p>The compliance officer will review draft policy/procedure during the PIHP management team review time and provide any feedback.</p> <p>The collected feedback is given to the affiliate point person.</p>
Affiliate Point Persons	<p>Forward feedback obtained from affiliate management teams back to the author for incorporation into the policy/procedure.</p> <p>Notify the PIHP point person that the review is complete for that affiliate.</p>
Author	<p>Incorporates all necessary feedback obtained from the affiliate management teams.</p> <p>Creates a flow chart of all key steps related to the implementation of the policy/procedure if applicable.</p> <p>Notifies the PIHP point person that the policy/procedure is ready for review by the AEC.</p>
PIHP Point Person	<p>Notifies the affiliation management assistant to place the policy/procedure on the AEC agenda.</p> <p>Documents in the tracking system that the policy/procedure is ready for the AEC agenda.</p>
Affiliation Management Assistant	<p>Notifies the author of when the policy/procedure is on the AEC agenda. If date is modified, notifies the author and PIHP point person of the date change.</p>

APPROVAL STAGE

Author	<p>Presents the draft policy/procedure to the AEC.</p> <p>Makes any necessary changes to the policy/procedure after input from the AEC.</p> <p>Completes a board action form that includes implementation</p>
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	dates and attaches it to the policy/procedure.
	Forwards the most recent version of the policy/procedure to the affiliation management assistant and notifies the PIHP point person.
PIHP Point Person	Documents in tracking system that the policy/procedure is ready for the regional subcommittee of the WCHO board.
	Forwards the policy to be formatted and prepared for the board packet.
PIHP Policy Format Specialist	Ensures that the policy is in the proper template and ensures: <ul style="list-style-type: none"> • All grammar and spelling errors are corrected • Page numbers are included • Changes are highlighted • Font type and size meet requirements • Margins are the same • All needed attachments are included
	Places the policy in the appropriate board policy electronic folder.
Affiliation Management Assistant	Obtains the policy from the appropriate electronic file and Includes the policy/procedure in the packet for the regional subcommittee of the WCHO board and notifies the author of the board meeting date.
Author	Presents the policy to the regional subcommittee of the WCHO board.
Regional Subcommittee	Approves, Approves with changes or Denies the policy/procedure
Author	Makes any necessary changes to the policy/procedure based on approval with changes within 5 business days and sends to PIHP Point Person.
	If Denied, takes any feedback from the regional subcommittee and makes any necessary changes and starts back at the beginning of the process again.
Affiliation Management Assistant	Documents via minutes the action to approve or deny policy.
	Forwards minutes to the WCHO management assistant to be included in the WCHO full board packet.
WCHO Full Board	Approves or denies the regional subcommittee policy/procedure actions.
WCHO Management Assistant	Notifies the PIHP point person of when regional subcommittee actions have been approved or denied the policy/procedure action.
PIHP Point Person	Documents in the tracking system that the policy/procedure is approved or denied.
	Notifies PIHP Policy Format Specialist and sends the policy.

POSTING/DISTRIBUTION STAGE

PIHP Policy Format Specialist	Formats the policy and saves policy to policy manual within 5 business days.
PIHP point person	Sends the policy to PIHP Point person, Affiliation website specialist and Provider Website specialist (if needed) Sends the WCHO full board approved policy/procedure to each affiliate.
Affiliates	Adopt the policy/procedure through their approving bodies. Once adopted, formats policy/procedure for affiliates manual.
PIHP Point Person	Notify PIHP point person when policy/procedure has been adopted. Documents in the tracking system that each affiliate has adopted the policy/procedure.
Provider Relations Department	Places policy/procedure in appropriate provider manual in all applicable locations.
Affiliate Point Person & PIHP Point Person	Notifies all staff of new policy/procedure If applicable, ensures policy/procedure is placed on affiliate websites or other intranet/shared drive locations.

Exhibit A

Policy Action

Policy name: _____

Author Name & Email: _____

Background:

New Revised Rescind

Replaces:

Old only

Other (please list):

Compliance Date:	
Steps:	1. 2. 3.

Policy Manual Chapter:

Administrative (General)	Management of Information
Environment of Care	Performance Improvement
Finance/Contract Management	Provision of Care
Human Resources	Recipient Rights

Management Team: Approve As Is Approve with Attached Changes

Sub Committee: Approve As Is Approve with Attached Changes

Post Policy to:

Provider Manual

Affiliation Website

BOARD ONLY

Recommendation:

Approve Deny

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- I. PURPOSE
- II. POLICY
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- VI. EXHIBITS

VII. REFERENCES

Reference:	Check if applies:	Standard Numbers:
42 CFR Parts 400 et al. (Balanced Budget Act)		
45 CFR Parts 160 & 164 (HIPPA)		
42 CFR Part 2 (Substance Abuse)		
Michigan Mental Health Code Act 258 of 1974		
JCAHO- Behavioral Health Standards		
MDCH Medicaid Contract		
MDCH Substance Abuse Contract		
Michigan Medicaid Provider Manual		

VIII. PROCEDURES

WHO	DOES WHAT

Exhibit B

Affiliation Author Policy Flow Checklist

Author must ensure all steps, in order, of this process are completed.

- Policy Author notifies the PIHP point person of need for new/change policy
 - Notes expected completion date
 - Obtains official policy template from PIHP policy format specialist, action form and checklist if needed.
- Policy Drafting
 - Obtain all standards
 - Obtain stake holder input
 - Strike through and bold changes made to the policy
- Completed draft to PIHP point person
 - Sends to affiliate point people and notifies of review end date and documents
 - Affiliate point person renegotiates dates with PIHP point if needed and forwards to local management teams for review
 - Management team ID's a person to collect feedback if author is not present and forward to affiliate point person.
 - Affiliate point person forwards feedback to author and notifies the PIHP point person of completion of review
- Incorporate Management Team Recommendations
- Send PIHP Point Person for AEC review
 - Document and notify affiliation management assistant
 - Affiliate management assistant informs author of AEC agenda date/time
- Present Policy to AEC
- Incorporates changes from AEC
- Forwards policy/board action to PIHP Point Person
 - Sends to PIHP Policy Format Specialist: Formats Policy, corrects grammar/spelling & saves policy to Regional Subcommittee Policy File and notifies PIHP point person
 - Affiliate Management Assistant includes in board packet and notifies author of meeting date
- Present Policy to Regional Subcommittee
 - Regional Subcommittee approves, approves with changes or denies
- Incorporate board changes and send to PIHP Point Person
 - Affiliation management assistant documents in minutes and forwards the minutes to WCHO management assistant for full board packet
 - Full board approves and WCHO management assistant notifies PIHP point person
 - PIHP point person sends to PIHP Policy Format Specialist: Formats Policy, corrects grammar/spelling & Saves policy to Policy Manual and notifies PIHP point person
 - PIHP point person sends to all affiliate point people and to be formatted
 - Affiliates adopt policy via local boards and notify PIHP point person of approval date
 - PIHP point person documents approval date

This is an optional form to assist you through the policy development process. Please do not submit this form with the policy at each step of the process

Exhibit C

Policy & Procedure Development Flow

Wednesday, November 15, 2006





