Critical Access Hospital Policy and Procedure Workshop



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	08:00 - 08:30	Welcome and Introductions		
	08:30 - 09:30	Compliance and Legal Purpose to P&P		
	09:30 - 09:45	Break		
	09:45 – 10:45	Policy vs Procedure vs Plan vs Protocol		
	10:45 – 11:45	Policy Governance: Process to Develop, Review, and Approve		
	11:45 – 12:45	Lunch		
	12:45 – 1:45pm	Steps to Creating Policy: planning, analyzing, researching, writing		
	1:45 – 2:00pm	Break		
	2:00 – 3:00pm	Components of a Policy		
	3:00 – 4:00pm	How to Vet Organizational and Shared Policy and Supporting Documents		
	4:00 – 4:30pm	Call to Action / Closing		
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Plans, Policies & Procedures

Compliance & Legal Requirements



Learning Objectives

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- Recognize role of PP&P in meeting/maintaining regulatory and legal compliance
- List strategies for mitigating risk and liability through effective PP&P practices
- Identify steps to remain in compliance with current/changing statutes and accreditation standards



Outside Drivers of PP&P (to name a few!)

Federal Statutes/Agencies

- · CMS CoP
- Accrediting Organizations TJC, DNV, etc.
- · HIPAA, EMTALA
- · CDC, OSHA, OIG, OCR, etc.

• State Statutes/Agencies

- Texas Administrative Code/Health & Safety
- · HSSC
- Standards of Care
 - Professional Organizations

SB240: Work Place Violence

- Committee
- Governance Policy
- Plan



Examples of Internal Drivers of PP&P

- · Organizational Structure & Governance
- · Strategic Plan
- · HR Practices
- Accounting Processes
- Contractual and Vendor Relationships
- Services Provided



Effective PP&P Can...

- Help ensure patient safety
- Help achieve better standards of care
- Make the accreditation process faster and easier
- Guide compliance with laws and regulations
- Standardize processes to reduce variance and human error
- Minimize risk exposure
- · Provide evidence to reduce liability
- Promote employee safety and well-being
- Guide response to emergency situations
- Improve communication and teamwork

What does "effective" mean?



Significant Risk If PP&P Are...

Outdated

Why would a policy <u>not</u> be followed?

- Contradictory
- Inconsistent
- Vague or overly prescriptive
- Not based upon current standards
- · Poorly disseminated
- · Hard to find
- Not followed



Mitigating Risk

- Avoid policy proliferation
 - Is it required?
- Use clear and easily understood language
 - Terms a newcomer would recognize
- · Be concise
 - Overly long policies create confusion
- Ensure compliance
 - Establish and follow a defined review process
- · Obtain consensus
 - Involve appropriate stakeholders
- Manage references
 - File references separately
 - Avoid cross-referencing policies
- Standardize and Centralize



Policies Are Often Discoverable

Consider...

- Certain policies may warrant a "disclaimer statement"
- Ensure and document policy dissemination, training, and accessibility
- Overly prescriptive policies may not allow for situational professional judgement and variation
- Inconsistencies across the organization can be red flags



Strategies to Ensure Compliance

Leverage Internal Experts

- Legal and Advocacy
- Compliance Officer
- Quality and Risk Leaders
- Safety Officer
- Human Resource Leader
- Medical Staff Leadership
- Look to Outside Resources
 - Professional Organizations
 - Accrediting Agencies
 - Liability Insurer
 - Policy & Procedure Software
 - Consultants



Questions/Discussion



References

- Ays, J., et. al. (2021). *Effective Health Care Policies Mitigate Litigation Risks.* Retrieved 2/26/2024 from https://forum.ashrm.org
- Irving, A. (2014). Policies and Procedures for healthcare: A Risk Management Approach. Retrieved 02/26/2024 from <u>https://www.psqh.com</u>
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- Kelly, U., Edwards, G., and Shapiro, S. (2021). *Nursing policies and protocols: Do nurses Really use them.* Journal of Nursing Care Quality, 36(3), pp217-222.







Policy / Procedure / Plan / Protocol / Guideline



Learning Objectives

- Define policy, procedure, protocol, plan and guideline
- Identify at least three differences between policy, procedure, plan, protocol, plan and guideline
- Describe what requires a policy
- Describe what requires a procedure or plan
- Identify when a protocol or guideline is appropriate



Strategic Planning

- **Strategic Plan**
 - Long-term goals of an organization
 - focuses on the bigger picture of what an organization wishes to achieve
 - **Reflects the mission / vision / values**
- **Tactical Plan**
 - Short term goals at department level
 - methods by which organization will achieve strategic plan
- **Operational Plan**
 - dealing with daily operations
 - carried out at the frontline level





Policies

- Set parameters for decision making
- Clear, concise and simple language
- May leave some room for flexibility
- Sets the rule not how to implement the rule
- Looking at the bigger picture

Example : Smoking policy





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Procedures

- Step by step instructions
- Written with the worker in mind
- Outline who is responsible for the task in general terms
- Provides each step that needs to be taken to complete a task or fulfill the obligation
- Answers the question of "HOW" for an action

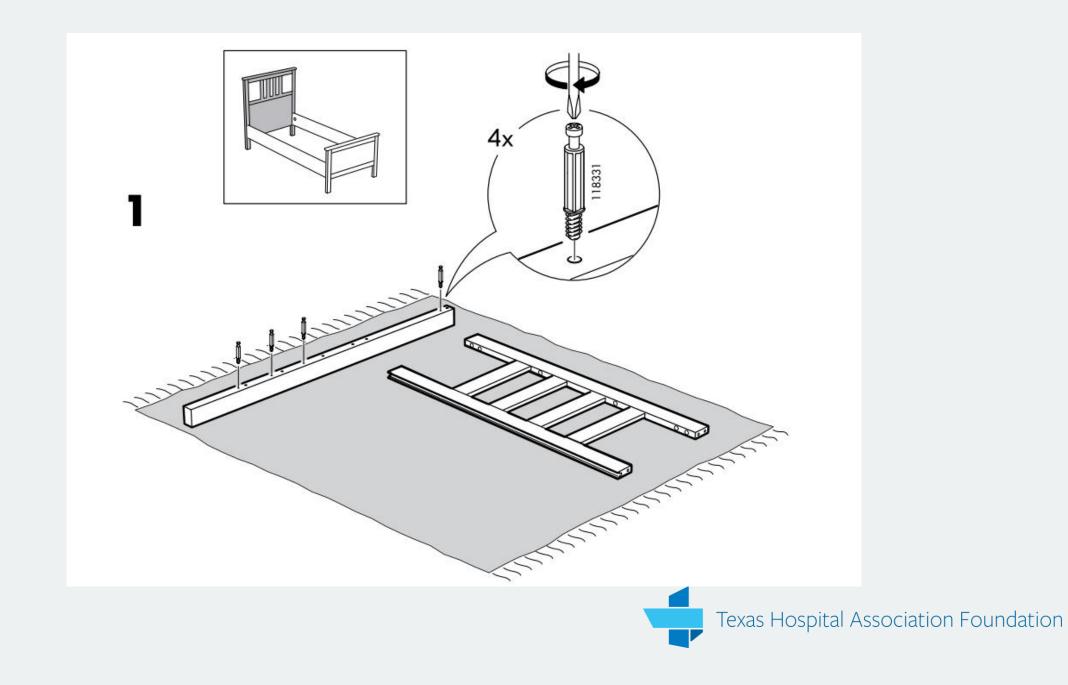
Example : How to put together IKEA bed frame



Step 1	Step 2	Step 3
Q Search for product		Product details
	Product details >	Product details Assembly & documents Assembly instructions
	,	PRODUCT assembly instructions (PDF)
Search for your product at the top of the page and go to your product's page.	Scroll down the product information page and click product details. A pop-up will open with a link to	Click Assembly & other documents to open t product assembly instructions will be listed.

product details. A pop-up will open with a link to Assembly & other documents.

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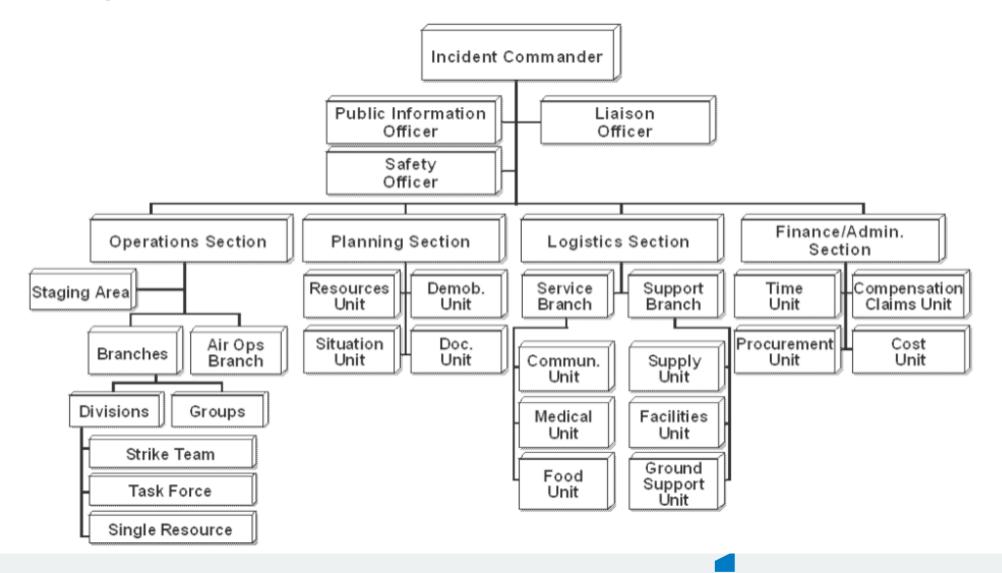
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- Differ from procedures as they are typically more specific
- May "name names" as to who is actually responsible for an action item
- Identifies key objectives and target dates for completion
- Identifies how success will be measures

Example: Hospital Disaster Management Plan



ICS Organizational Structure and Elements

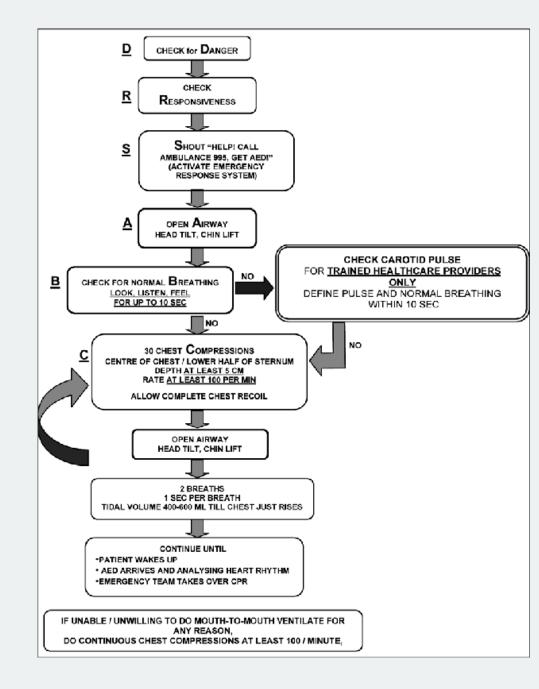




- Written list of procedures to follow in a specific situation
- A standard of care that describes interventions or a set of interventions
- Gives clear direction on what comes next to achieve a goal or complete a task

Example : CPR





Basic CPR Algorithm

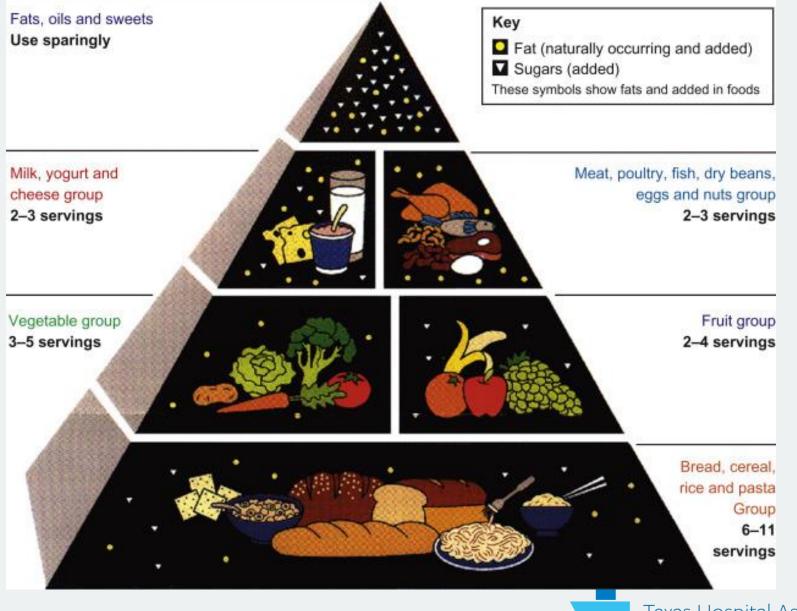


Guidelines

- A guide to a process
- Not mandatory to follow them
- Provide suggestions on what can be done in specific situations
- Can be used to make actions more predictable

Example : Set dietary guidelines





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We have identified the differences....

How are they all similar?



Similarities

- Should all be based on evidence based best practice
- Should all adhere to any rules / regulations set by regulatory or
- credentialing agencies
- Be supported by peer reviewed research
- Be approved through designated organizational process



Peer Reviewed Research

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Also known as scholarly publication

Publications written by experts are reviewed by

other experts in the same field

Weeds out invalid or poor-quality research

Maintains quality of scientific work





In light of increased incidence of school related shootings some schools now allow teachers to conceal carry on campus



School Safety

- · Policy
- · Procedure
- · Protocol
- · Plan
- · Guidelines



Workplace Violence

Workplace violence has dramatically increased since the Covid pandemic. New legislation requires organizations to take action.



Workplace Violence

- · Policy
- · Procedure
- · Protocol
- · Plan
- · Guidelines







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Policy Governance

Policy on Policies



Learning Objectives

- Describe the key requirements of a standardized approach to policy development and maintenance
- Identify strategies to overcome resistance to and/or drift from standardization
- Understand how to utilize standardization to promote compliance and optimize organizational performance



Purpose of Policy on Policies

- Establishes Oversight and Accountability
- Defines Roles and Terminology
- Promotes Clarity and Organizational Efficiency
- Maintains Compliance and Mission Focus
 Mitigates Risk



Key Components

A Policy on Policies should establish and Define:

- · Policy Committee
- Policy Administrator role(s)
- · Policy ownership
- Format and Required Components
- Minimum review timelines
- Approval pathways
- Dissemination process
- Access and security
- Archival and retention



Oversight and Accountability

- Policy Administrator
 - Oversight of Policy Governance
- Policy Committee
 - Structure for operationalizing policy processes
- · Policy Owners
 - Accountable for following process for specific policies



Format and Requirements

- Clear and consistent
- Standardization of process
- Required fields
- · Promotes ease of understanding
- · Helps identify "rogue" policies



Development, Review, Approval

- · Process Map
 - Define steps and required documentation
- Approval Pathways
 - Guide inclusion of key stakeholders
 - Ensure orderly approval
- · Review Timelines
 - Minimum review deadlines
 - Timelines for higher risk policies



Dissemination and Access

- Target audience
- Education/Training Plan
- · Timeline
- Access location
- Access availability
- · End-user feedback



Archival and Retention

- Previous versions
- · Retired policies
- · Legal requirements
- · Liability protection
- \cdot Who and where
- How retrieved



Governance Strategies

- Enforcement of Process
- Rolling Calendar
- Ensuring Purpose and Necessity
- · Identification of "Rogue" Policies
- Eliminating "Silo" Policies
- Monitoring for Duplication and/or Conflicts
- Appropriate Linking and Referencing
- Solicit and Respond to Feedback _____



Questions & Discussion



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- Yusuff, G. (2023) *Building a Strategic Framework for Policy Governance.* Retrieved 2/26/2024 from https://onetrust.com







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Steps to Creating Policy

Planning, Analyzing, Researching, Writing

Objectives





Preparation and Planning

Importance of Policy and Procedure

Patient Safety

Reduced liability

Increased complexity of patient care

Types of Policies

	Administrative and human resources (HR)
	Health and safety
	Information management
Ę	Medicine and drug handling
(Je	Patient care
	Coding and billing
\checkmark	General compliance



Policy Research



Organizational Policy Audit

Subject Matter Experts



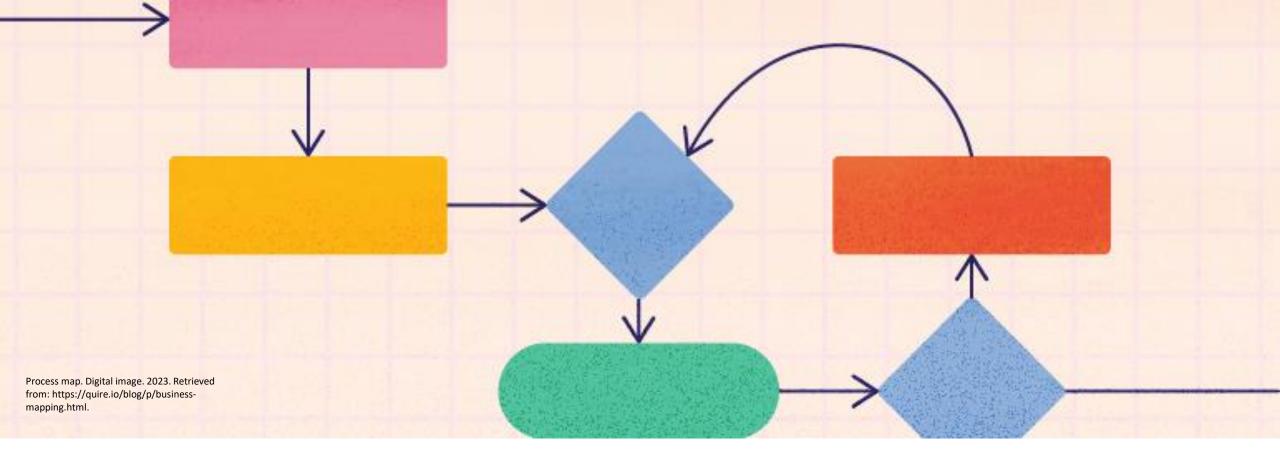
SME. Digital image. 2024. Retrieved from: https://asana.com/resources/subject-matter-expert-sme.

Understand regulatory and accreditation requirements



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List out steps of Processes and Procedures





Best Practices to Support Policy



Medical Library



AHRQ, CMS, Joint Commission, IHI



Professional Organizations



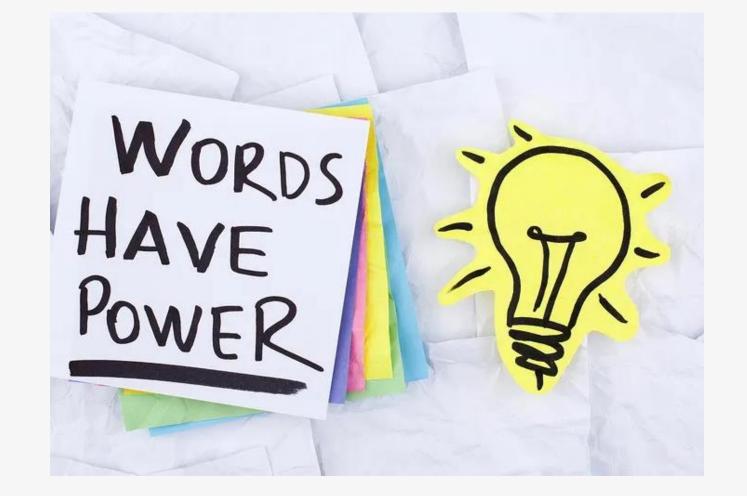
Policy Writing Process



Standard Policy Format

- Date
- Policy number
- Approvers (including who has final approval authority)
- Associated procedures
- Definitions of any unique terms in the policy (ideally hyperlinked to an online glossary)
- Any applicable statutes, regulations, or other related source documents
- Specific examples of when this policy will apply





Words have power. Digital image. 2015. Retrieved from: https://leaderchat.org/2015/05/12/leaders-what-areyour-word-choices-saying-about-you/. Use Common Language, Abbreviations

Word choice matters

Legal requirements

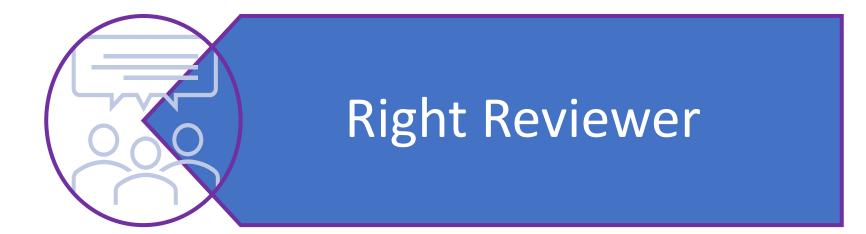
Include measurable objectives

- Communicates the reason (the why?" behind the policy)
- Examples:
 - Reduce infection
 - Improve attendance
- Helps to manage and assess effectiveness of the policy



Write and Review

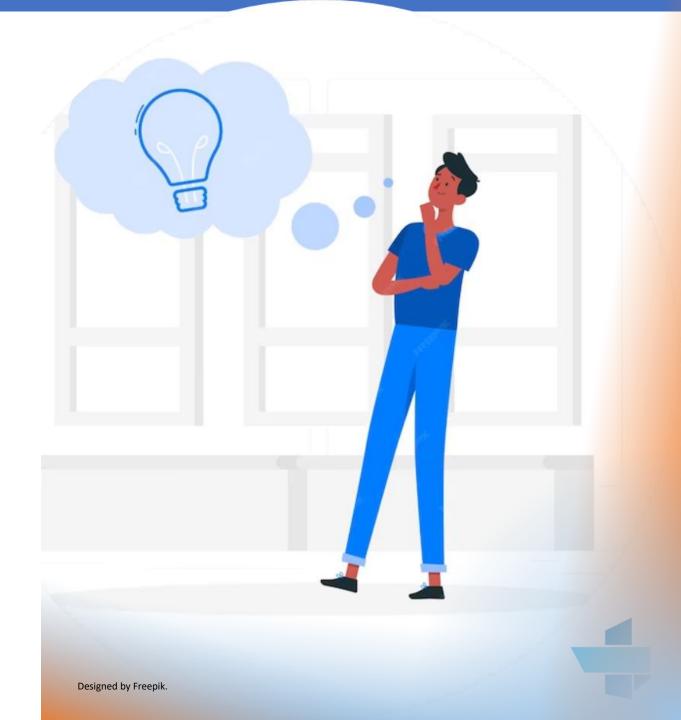




Things to Consider

• One size does not fit all

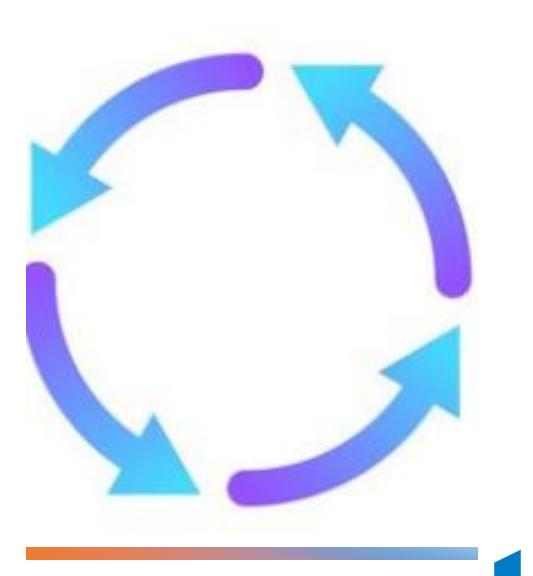
• Original/Custom



Policy Analysis

Set up a policy review cycle





Policy to manage policies

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Policy Committee

Policy Administrator

Maintain and Archive

Control Access and Security



Questions?



Components of a Policy

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Objectives

12Discuss the key
components of
policyIdentify features
of a reliable
policy

3

Demonstrate appropriate policy writing style



Demonstrate logical organization of information

Header and Title







DEPARTMENT OF NURSING POLICY AND PROCEDURE

SUBJECT: Faculty/Nursing Guidelines for Clinical Rotation at MWHC DISTRIBUTION LIST:	ORIGINAL DATE: August 2005 EFFECTIVE DATE: June 2012 REVIEWED BY:
Department of Nursing	Dina Rosenthal, RN, MS, CCRN Clinical Nursing Instructor
APPROVED BY:	



The Ottawa | L'Hôpital Hospital | d'Ottawa

CORPORATE POLICIES AND PROCEDURES

SOCIAL MEDIA No: 00672 (Formerly ADMIII390)

ISSUED BY: V.P. Communications

DATE OF APPROVAL: 2013/03/20

APPROVED BY: Senior Management Committee

CATEGORY: Communications

LAST REVIEW/REVISION DATE: 2013/03/20

IMPLEMENTATION DATE:



Policy and Procedure Manual

University of Iowa Health Care

Diagnostic Services- Department of Radiology – Diagnostic Division

SUBJECT/TITLE: IV Contrast Administration For Patients With Limited English Proficiency



State to whom policy will apply

May reference other key documents

Why the organization is issuing the policy and where it sits in the organization

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Scope

This policy applies to all XXX Hospital employees and its students. It presents guidelines that can be used to determine what information is confidential, what constitutes a breach of confidentiality and the disciplinary process for employees who breach confidentiality.

Title: Safety Sitters Scope: Clinical Index #: 12-304

Group Activity



Purpose

States the *need* for policy and provides rationale

Brief sentence or paragraph



PURPOSE:

To insure effective communication with patient with limited English proficiency.

PURPOSE:

This policy explains the use of safety sitters at XXX, and to provide guidelines for continuous visual monitoring of patients using XXX, including criteria selection.

Initiation of continuous visual monitoring is a nursing intervention. It can be utilized to ensure patient safety as an additional tool in the plan of care for patients at high risk for falls, confusion, impaired mobility, etc.

Purpose

Patient information, regardless of its medium (written, verbal, or stored in paper, photograph, video, or electronic format), may be used for a variety of legitimate purposes, for example, patient care, quality review, education, research, public health, legal and reimbursement. Regardless of its use, patients must be assured the information they share with health care professionals will remain confidential. Without such assurance, patients may withhold critical information that could affect the quality and outcome of care, as well as the reliability of the information.

Definitions

Identifies or clarifies important terms and phrases used in the policy





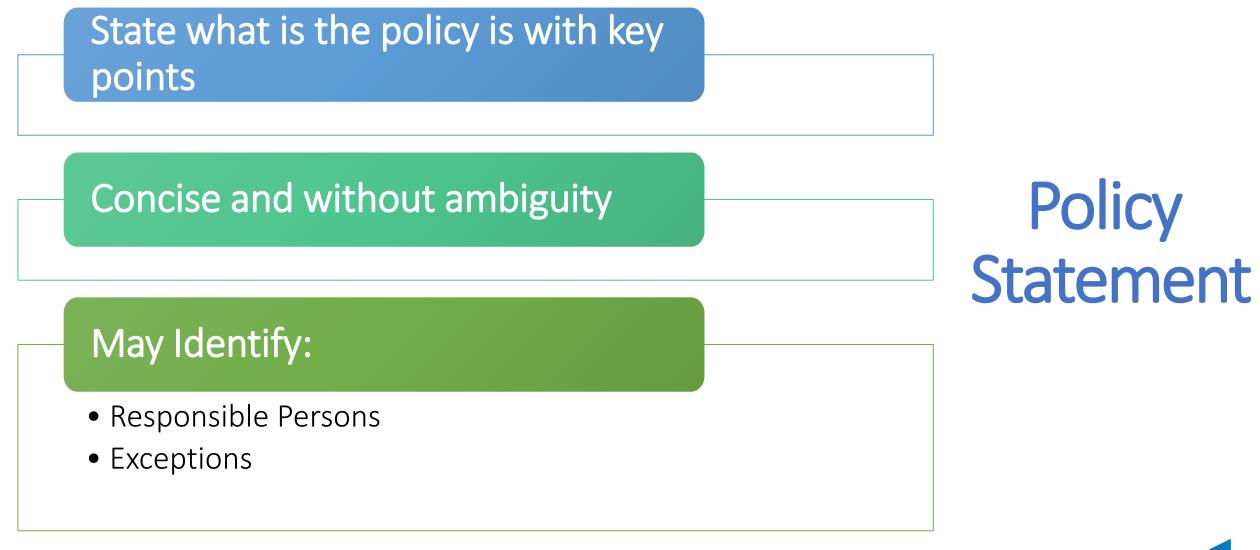
DEFINITIONS: Limited English Proficiency: A person who may be denied the opportunity to participate effectively in decision-making concerning his or her health care because of difficulty speaking, reading, writing, or understanding the English language. These persons may include speakers of a foreign language, deaf persons whose main mode of communication is one of various signed languages, or persons who are both deaf and blind.

Definitions

- **Confidential information** is information derived from a relationship between patients and health care professionals. Confidential information includes, but is not limited to:
 - health/clinical information diagnosis, treatments, test results, etc.
 - demographic information name, age, address, phone number, etc.
 - appointment information date, time, reason for appointment, provider, etc.
 - insurance/financial information source of payment, account balance, account for billing, etc.

A sitter is a XXX employee who will be at the patient's bedside to provide continuous observation of a patient and provides basic assistance with the activities of daily living (ADL) such as feeding, toileting, range of motion and ambulation assistance.

Group Activity



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POLICY:

All patients who are to receive an injection of contrast media via intravenous injection are provided with, and asked to read an information sheet regarding the procedure, and the potential side-effects that they may experience.

POLICY:

To ensure a safe environment for patients that are identified as a potential risk to themselves or to others, XXX shall utilize sitters to provide continuous observation. This may be provided through one on one bedside observation or by utilization of a remote safety monitor.

It is XXX belief that our patients:

- Should be provided respectful, compassionate and efficient care
- Should be provided a safe environment
- Should have patient rights maintained as outlined in the patient handbook

Relevant Procedures and Guidelines

Include detailed procedures or guidelines that will help employees adhere to the policy effectively and consistently

Consider using bullet points or lists to improve readability

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Procedure

- Employees may access patient information only when it is necessary to perform their jobs.
- Gossip, careless remarks and idle chatter may be a violation of trust and the patient's right to confidentiality.
- Employees are not authorized to access medical records and/or the Marshfield Ambulatory Record System (MARS), and Combined Medical Record (CMR) to obtain information on themselves, their spouse or their dependents. While this information is about you and your family, and you may have a right to know, information must be obtained through proper channels. Proper channels include calling the attending physician, health care provider or the Medical Record Department. The Release of Medical Information Policy outlines the steps required to retrieve information on yourself or your dependents. Employees are expected to follow the same procedure as nonemployees.
- Patient information must be disclosed only upon written authorization by the patient or his/her legal representative or where such disclosure is authorized by federal or state law, subpoena or court order, and in accordance with the Release of Medical Information Policy.
- Managers shall inform and educate employees about the Confidentiality Policy.
- An employee who needs clarification of the Confidentiality Policy should speak with his/ her manager.
- **Security:** Each employee has a password that enables him/her to access the computer system. This password is not to be shared with anyone. Each time an electronic record is retrieved, a tracking system identifies and records the time, date, locations and name associated with the computer terminal used. This tracking system is capable of identifying potential abuse. Employees are responsible for all inquires made using their password.

Stakeholders and Responsibilities



Stakeholders. Digital image. 2019. Retrieved from: https://www.projectengineer.net/guide-tostakeholder-management/. ✓ Identifies key roles and responsibilities of individuals or departments involved in implementing and/or enforcing the policy

✓ Ensures accountability



Clinical Staff Responsibility:

1. Assess that the patient is appropriate for continuous visual monitoring intervent criteria listed above).

2. Notify Monitor Tech, charge nurse, and house supervisor that patient is recomm telemonioring.

- 3. If patient meets criteria and is approved for telemonitoring, follow policy.
- 4. If patient is not approved for telemonitoring for any of the following reasons, in safety measures.

5. If there are no telemonitoring units available, notify house supervisor to initiate telemonitoring. If telemonitoring cannot be removed from anyone, waiting patien list.

 Communication shall be entered in Electronic Medical Record as a nursing intera. Tele Sitter Monitoring – Continuous

b. Reason for monitoring

VI. Faculty Responsibility Related to Medication Administration:

- A. The nursing instructor or the RN caring for the patient must log on for each med task and student will document under preceptor/faculty's logon.
- B. Meds must be documented through the handhelds or the wireless is in downtime. If the medication barcode does not scan bypass the handheld and document directly on the Medication Administration Record on the computer.

Group Activity

Compliance and Enforcement

Explain consequences of policy violations and organization's steps to ensure compliance

Emphasize importance of adherence to policy



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If needed for clarification



Supporting documents such as FAQs, Examples, or Implementation guidelines

Additional Information

Revision History



Include why changes have been made



Updates in standards of care



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Include citations and references

Group Activity



Questions?



Resources

n.d. DOs and DON'Ts of policy writing. Policy Medical. Retrieved from: chromeextension://efaidnbmnnnibpcajpcglclefindmkaj/https://assets.hccainfo.org/Portals/o/PDFs/Resources/library/DOs%20and%20DONTs%200f%20Policy%20Writing.pdf.

n.d. Policy template. Retrieved from: chromeextension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.oberstown.com/wpcontent/uploads/2017/06/PolicyTemplate_Final_V1.odocx.pdf.

n.d. Policy template. Retrieved from: chromeextension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.nyp.org/pdf/vendor-policy-I230.pdf.

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2017. Policy and procedure manual: Diagnostic services. University of Iowa Hospitals and Clinics. Retrieved from: chromeextension://efaidnbmnnnibpcajpcglclefindmkaj/https://medicine.uiowa.edu/radiology/sites/medicine.uiowa.edu.radiology/files /wysiwyg_uploads/iv-contrast-adm-limited-english.pdf.

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How to Vet an Organizational or Shared Policy

Is it sound or is it in need of repair?





- Define peer reviewed research
- Identify appropriate documents that support a policy or procedure
- Demonstrate proper use of citations for supporting documents



Policies / Procedures in Healthcare

Why we need a vetting process

All organizations must adhere to regulations, laws, and accreditation rules and mandates

Most organizations share the same issues

Healthcare organizations seek shared resources rather than start from scratch

What happens if we do not properly vet a policy/procedure

Legality of putting something in place that does not align with best practice or standard of care

Policy or procedure may not align with regulations, laws or accreditation mandates



Things to consider...

- Does it align with current best practice or standard of Care?
- Is it relevant to your organization?
- Does it answer the who / what / why?
- Is there clarity? Is it understandable?
 - definitions for important terms
 - easy to follow
 - no room for interpretation
- Original date last date of review





- Who wrote the policy / procedure / protocol?
- Who approved it?
 - Did it go through appropriate process for approval?

Why are these things even important?



Peer Reviewed Research

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Also referred to as scholarly publication

Publications written by experts are reviewed by

other experts in the same field

Weeds out invalid or poor-quality research

Maintains quality of scientific work



When checking resources

- Look for scholarly resources
 - professional journals
 - academic institutions
 - professional organizations
- **Evaluate authors**
 - do they practice in the field?
- Look at date of work
 - Is it current?
- What about bias?





DEPARTMENT OF NURSING POLICY AND PROCEDURE

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Faculty/Nursing Guidelines for Clinical	August 2005
Rotation at MWHC	EFFECTIVE DATE:
	June 2012
DISTRIBUTION LIST:	REVIEWED BY:
Department of Nursing	Dina Rosenthal, RN, MS, CCRN
	Clinical Nursing Instructor
APPROVED BY:	





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Workplace- Advantages and Disadvantages.

https://blog.vantagecircle.com/social-media-in-the-workplace/



Resources

- How to use social media at work (12/3/22)
- Using social media effectively (4/15/21)



What if

- · Your listed resource was an individual?
- Resources were more than 5 years old?
- The document was approved and implemented at the department level?
- The document contained items not relevant to your organization?
- The document was current in review date with proper approval but did not reflect current service lines or practice in the organization?









Quality Improvement Bootcamps

May 1-3, 2024

May 22-24, 2024

Abilene, Texas

Seguin, Texas

CNO – Nurse Leader Bootcamp

August 1-2, 2024

Austin, Texas

Documentation Workshop for Nurses

Date TBD

Virtual Documentation Learning Session for Physicians

Date TBD







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