
Critical Access Hospital Policy and Procedure Virtual Series

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TEXAS DEPARTMENT OF AGRICULTURE
COMMISSIONER SID MILLER

Learning Objectives

- 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
- 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

Plans, Policies & Procedures

Compliance & Legal Requirements

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...

Why would a
policy not be

- Outdated
- 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

Policy / Procedure / Plan / Protocol / Guideline

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

Policy

Plan

Procedure

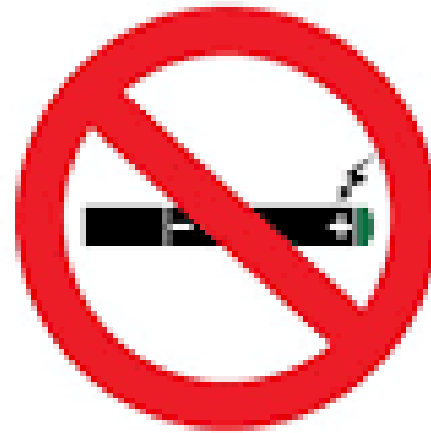
Guideline

Protocol

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



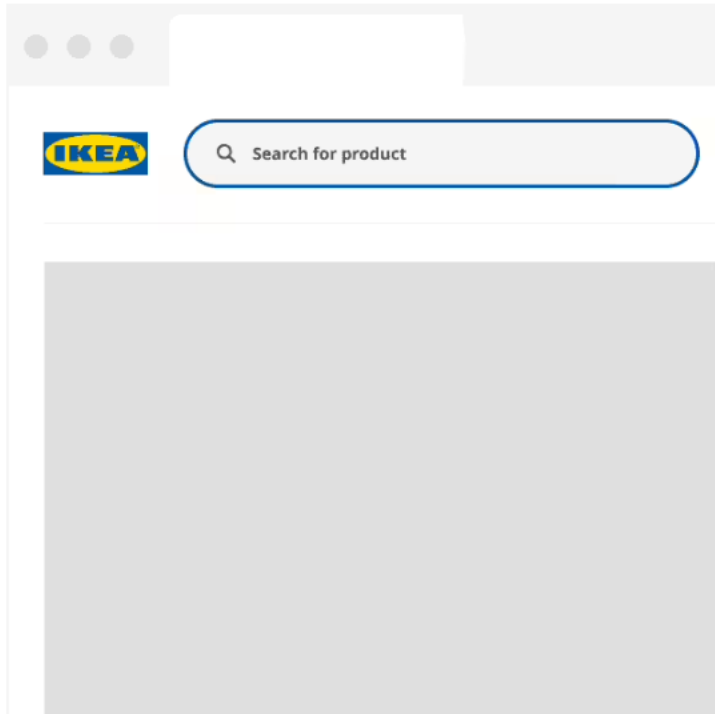
**THIS IS A
TOBACCO FREE
WORKPLACE**

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

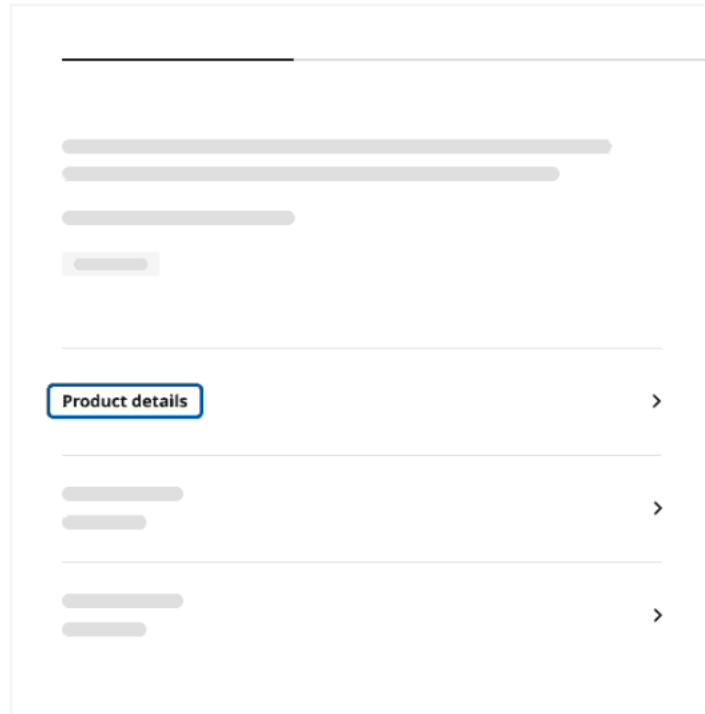
Example : How to put together IKEA bed frame

Step 1



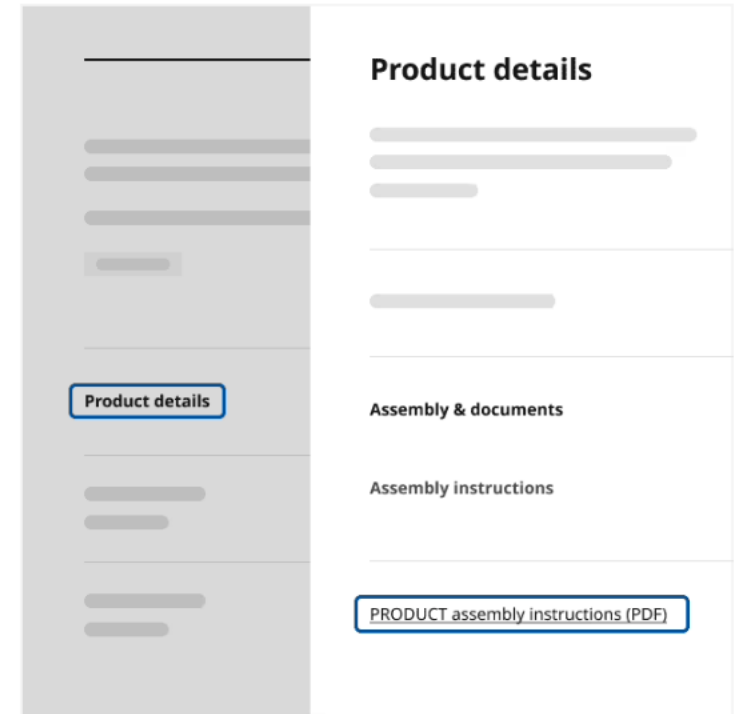
Search for your product at the top of the page and go to your product's page.

Step 2



Scroll down the product information page and click product details. A pop-up will open with a link to Assembly & other documents.

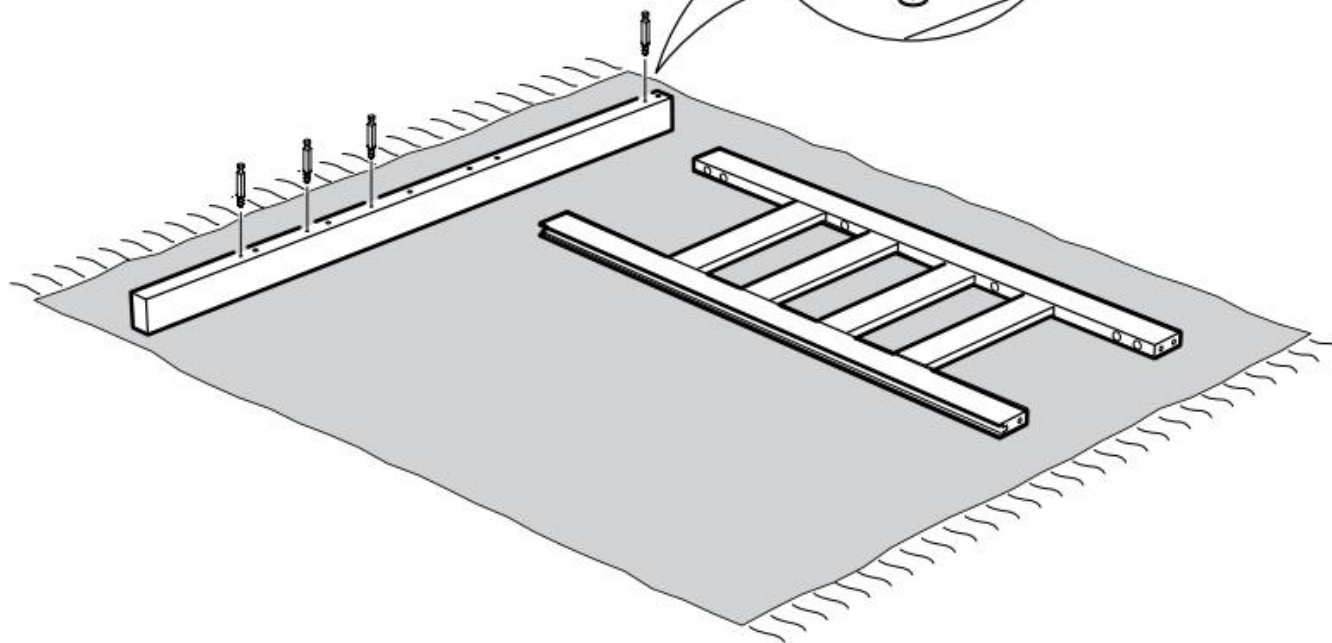
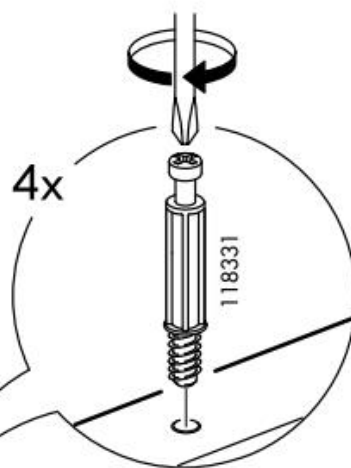
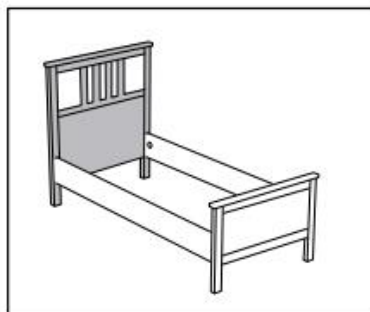
Step 3



Click Assembly & other documents to open the product assembly instructions will be listed.



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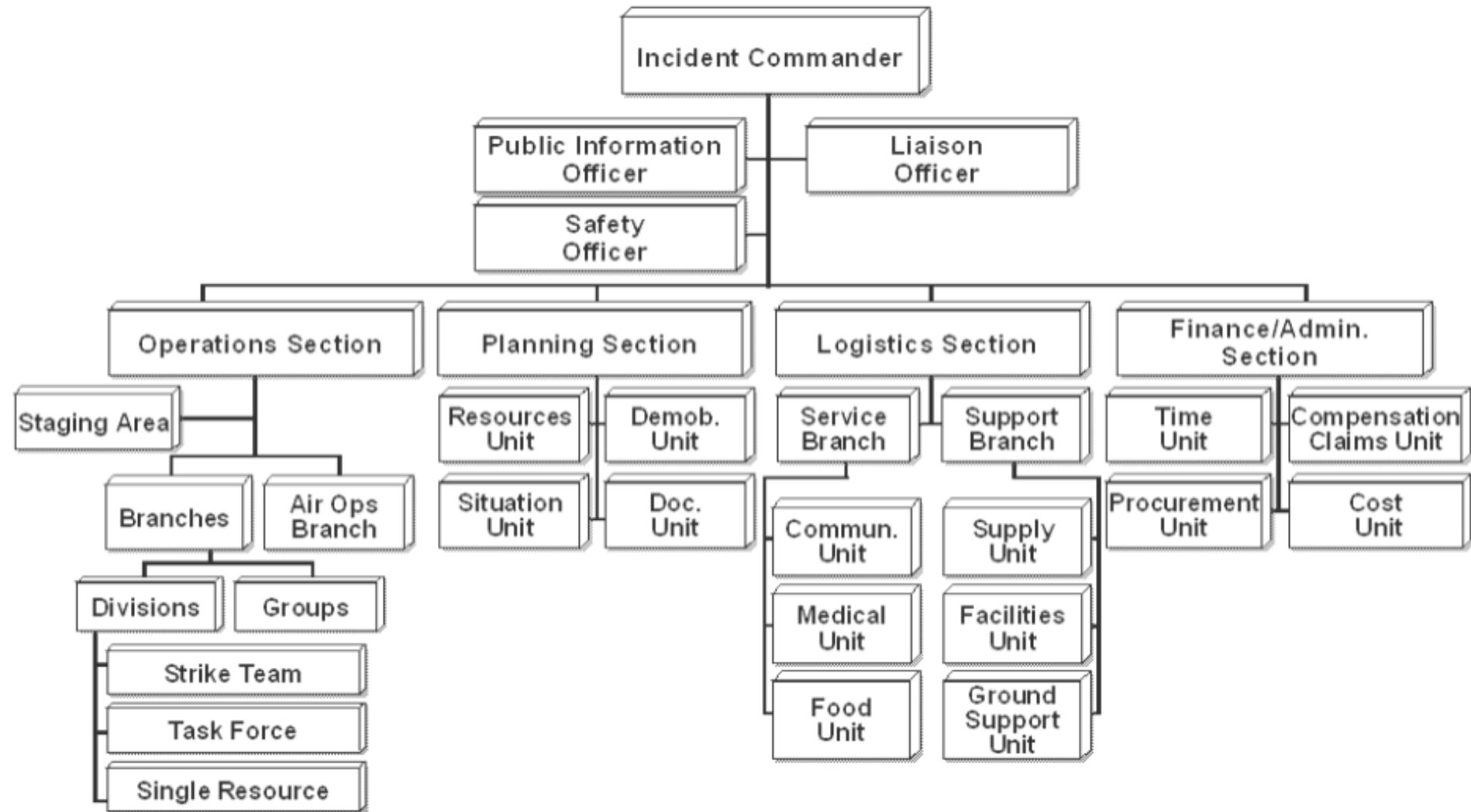


Plans

- 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

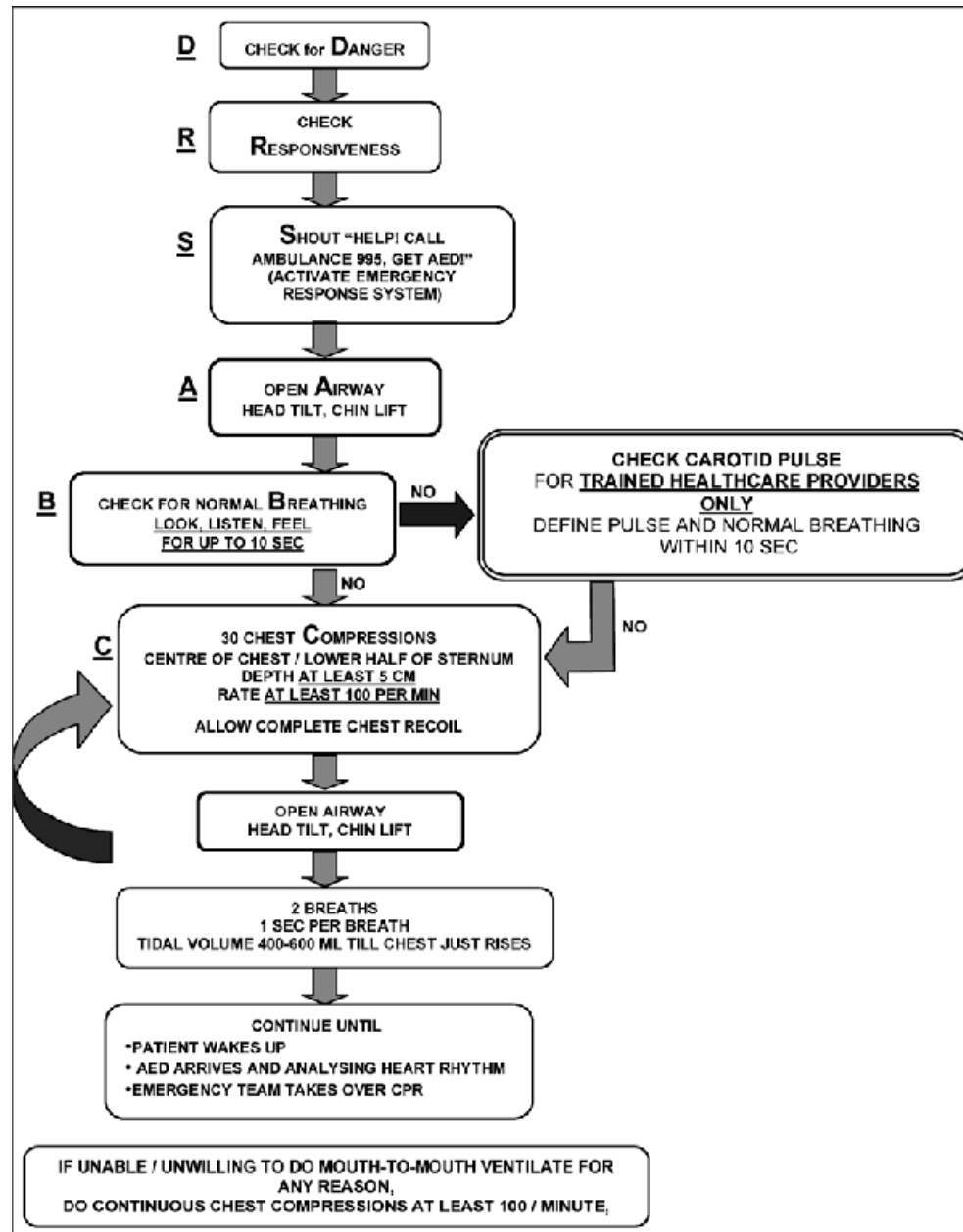
ICS Organizational Structure and Elements



Protocol

- 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

Fats, oils and sweets
Use sparingly

Key

■ Fat (naturally occurring and added)

▼ Sugars (added)

These symbols show fats and added in foods

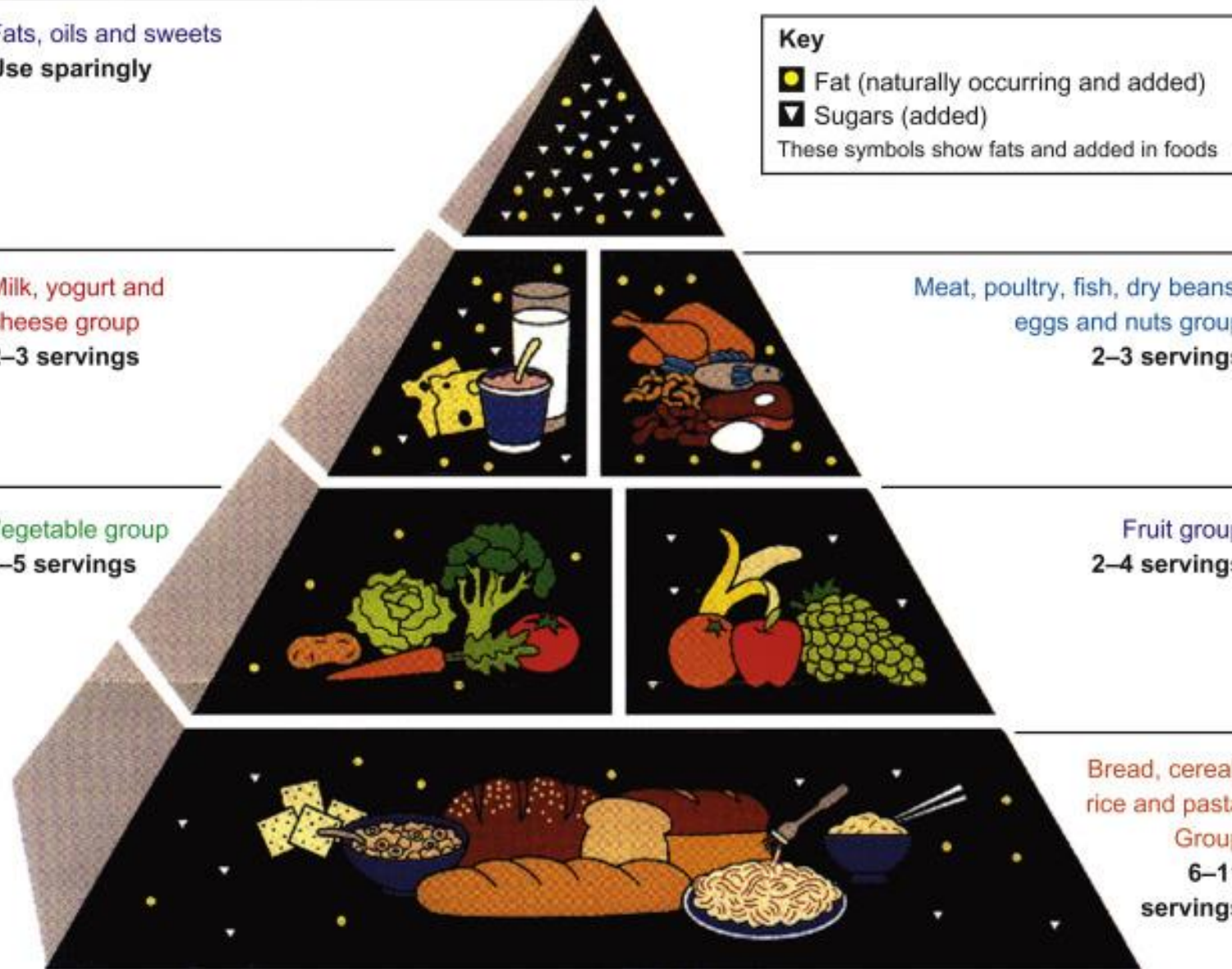
Milk, yogurt and
cheese group
2–3 servings

Meat, poultry, fish, dry beans,
eggs and nuts group
2–3 servings

Vegetable group
3–5 servings

Fruit group
2–4 servings

Bread, cereal,
rice and pasta
Group
6–11
servings



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

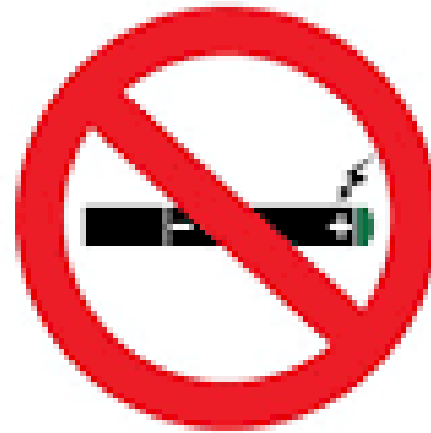
- Also known as scholarly publication
- Publications written by experts are reviewed by other experts in the same field
- Weeds out invalid or poor-quality research
- Maintains quality of scientific work

Workplace Violence

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

Workplace Violence

- Policy
 - Establishes the rule

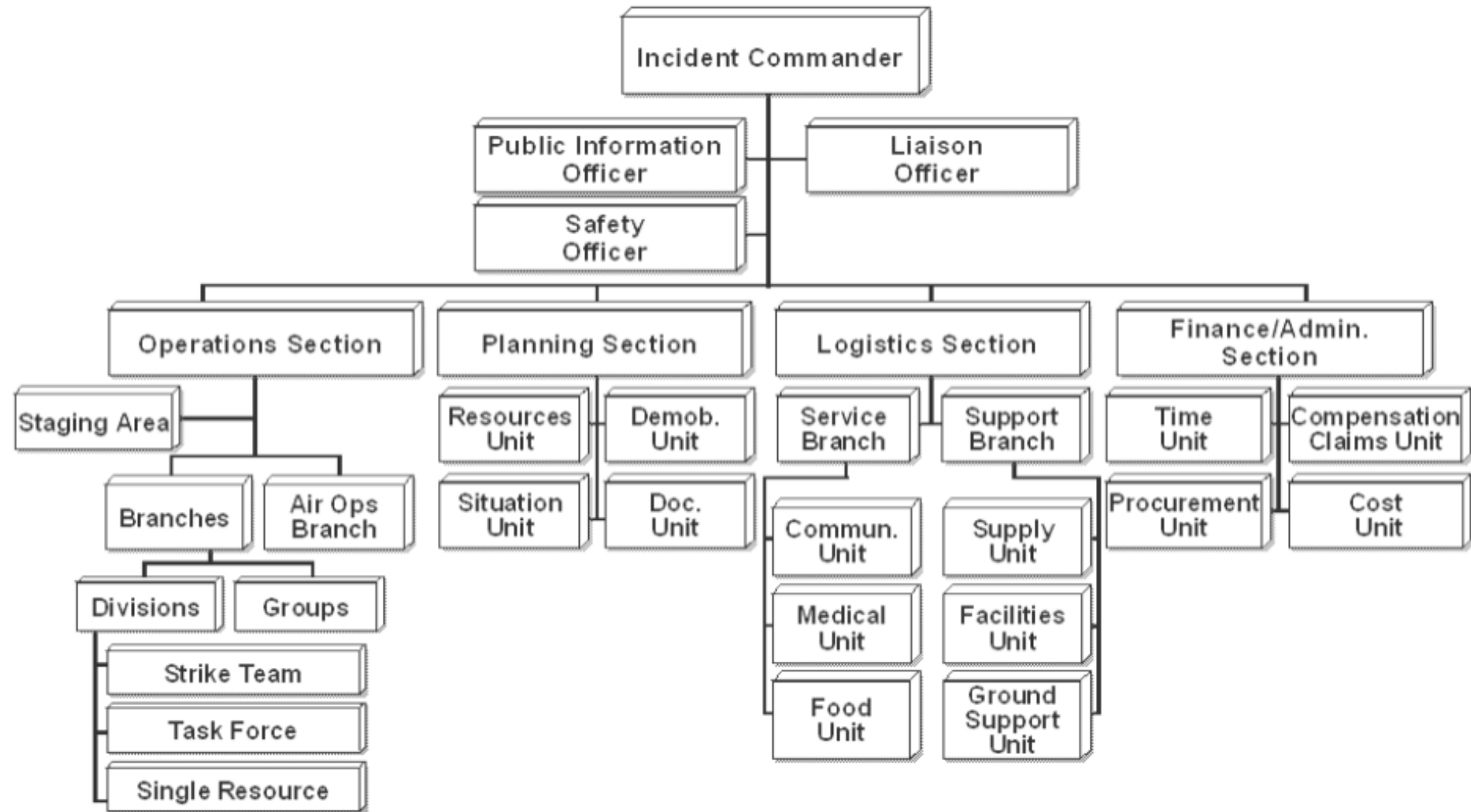


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WORKPLACE**

Workplace Violence

- Plan
 - More specific than procedures
 - Key objectives
 - How success will be measured

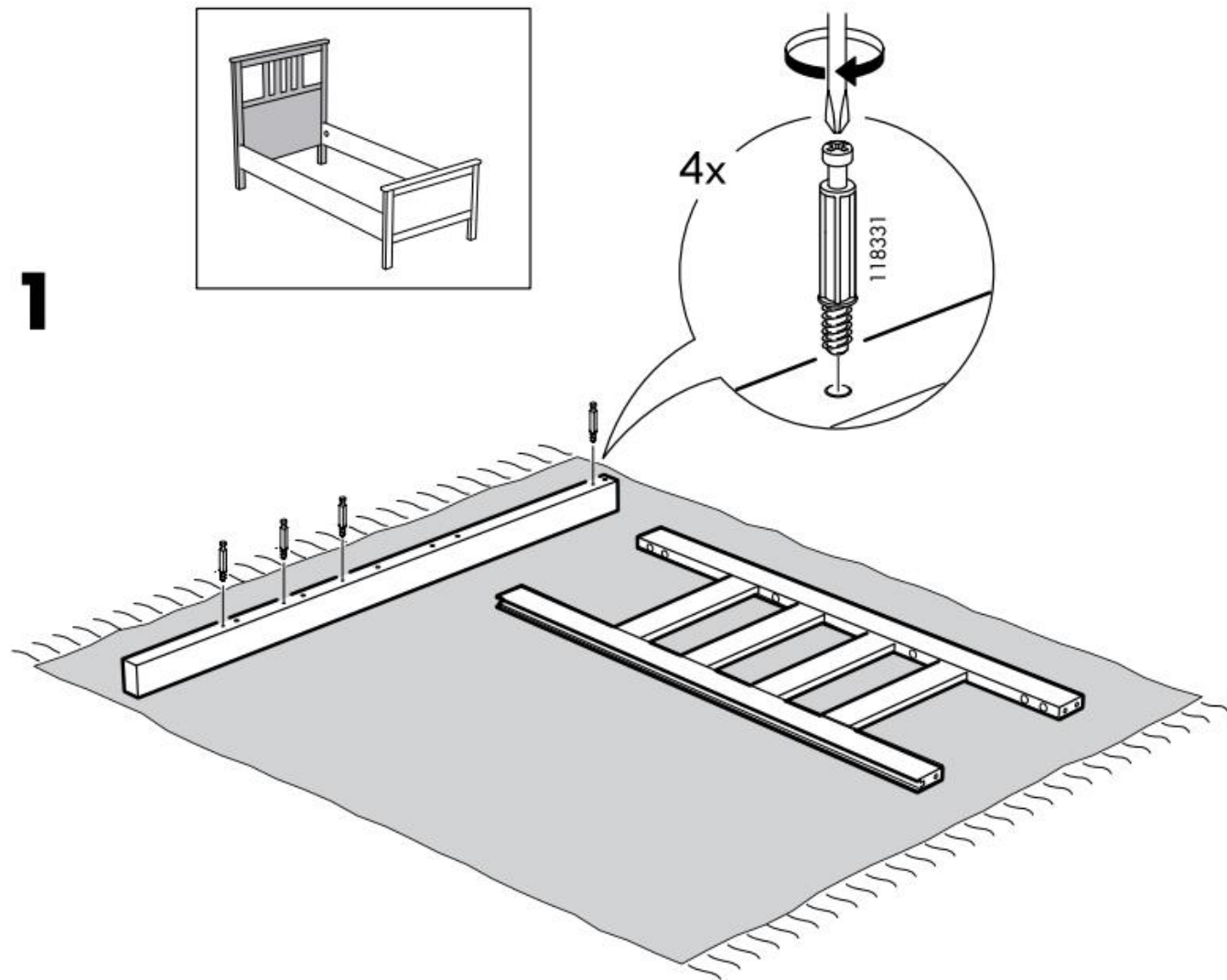
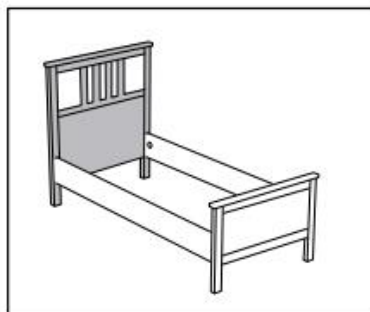
ICS Organizational Structure and Elements



Workplace Violence

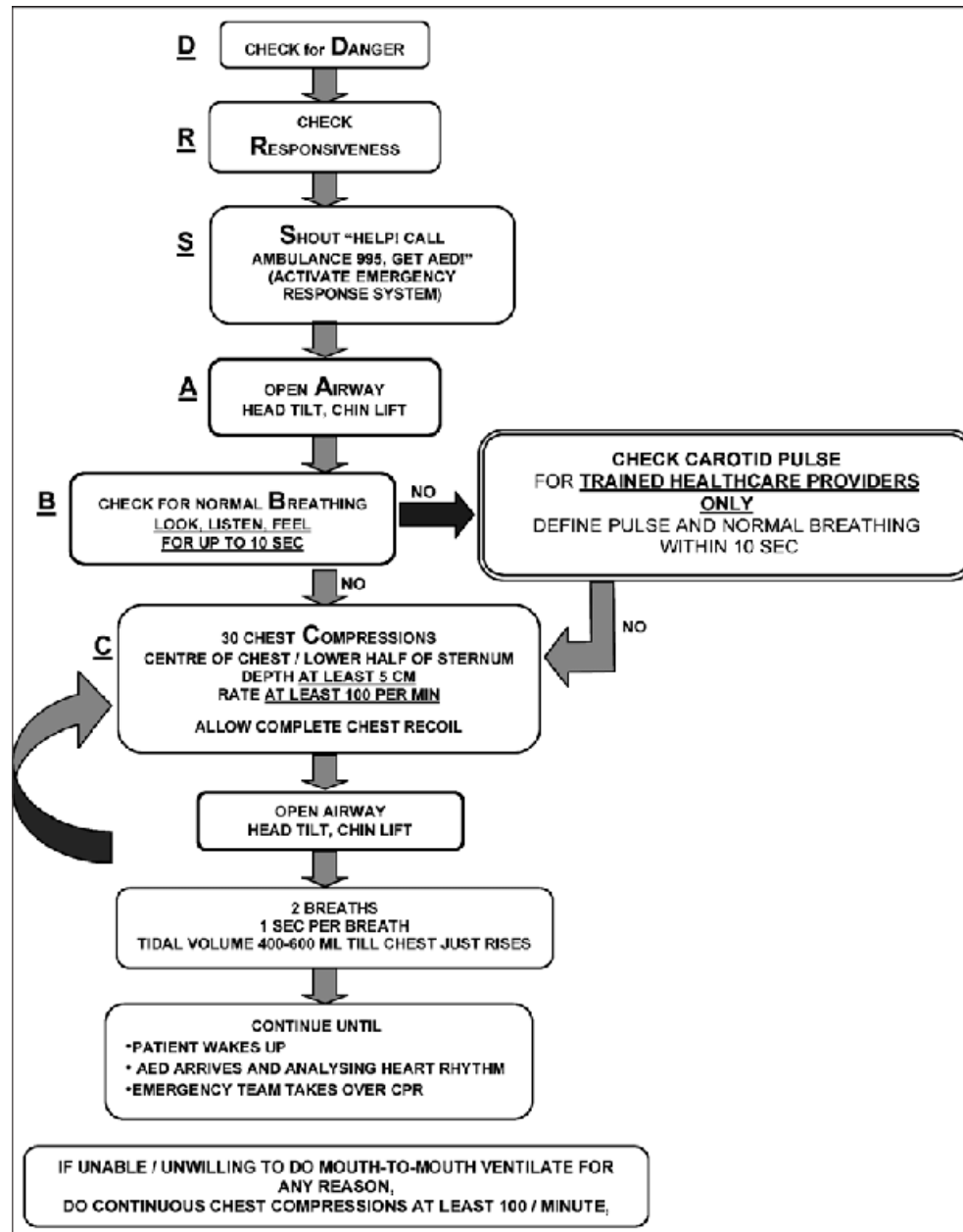
- Procedure
 - Step by step instructions
 - Who is responsible for what parts in general terms
 - The “how to”

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Workplace Violence

- Protocol
 - Set of interventions
 - Response at each step determines what comes next



Basic CPR Algorithm



References

Ays, J., et. al. (2021). *Effective Health Care Policies Mitigate Litigation Risks*. Retrieved 2/26/2024 from

<https://forum.ashrm.org>

Balanced Scorecard Institute (2023). What is strategic planning?.

[https://balancedscorecard.org/strategic-planning-](https://balancedscorecard.org/strategic-planning-basics/#:~:text=Strategic%20planning%20is%20an%20organizational,assess%20and%20adjust%20the%20organization's)

[basics/#:~:text=Strategic%20planning%20is%20an%20organizational,assess%20and%20adjust%20the%20organization's](https://balancedscorecard.org/strategic-planning-basics/#:~:text=Strategic%20planning%20is%20an%20organizational,assess%20and%20adjust%20the%20organization's)

InformedHealth.org [Internet]. Cologne, Germany: Institute for Quality and Efficiency in Health Care (IQWiG); 2006-.

What are clinical practice guidelines? 2016 Jun 15 [Updated 2016 Sep 8]. Available from:

<https://www.ncbi.nlm.nih.gov/books/NBK390308/>

Irving, A. (2014). *Policies and Procedures for healthcare: A Risk Management Approach*. Retrieved 02/26/2024 from

<https://www.psqh.com>

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.

Kelly, J., Sadeghieh, T., & Adeli, K. (2014). Peer Review in Scientific Publications: Benefits, Critiques, & A Survival

Guide. *EJIFCC*, 25(3), 227–243.

Lazzari, Zach (2019, May 19). Definition of tactical planning in business. *CHRON*.

<https://smallbusiness.chron.com/definition-tactical-planning-business-14401.html>

Rural Health Information Hub (2023). Operations Planning.

<https://www.ruralhealthinfo.org/toolkits/networks/4/planning/operations>

TJC. (2022). *Policies and Procedures for Hospitals*. Retrieved 2/26/2024 from <https://www.jointcommissioninternational.org>