

SAN MATEO COUNTY HEALTH SYSTEM
BEHAVIORAL HEALTH & RECOVERY SERVICES

DATE: April 9, 2008

BHRS POLICY: 08-02

SUBJECT: Policy Management, Development, and Approval Process

AUTHORITY: Departmental; Divisional

AMENDED: August 29, 2016: Also renamed with flowchart added

ATTACHMENT: Attachment A: Policy Process Flowchart

PURPOSE: To set forth standards on how new policies are developed, and existing policies are reviewed and updated as required or as needed.

POLICY:

For new policy development: The Executive Team Sponsor will assign a content area expert to author and provide project leadership to develop new policies that are feasible, and compliant with applicable laws, rules, and regulations. Quality Management (QM) will be consulted and involved in each step of new policy development and in many cases may be the content area expert and/or content researcher/developer.

For policy updates/revisions: If a change occurs that necessitates a revision or update of a policy, the Executive Team Sponsor and/or content area expert will contact QM for guidance and consultation. In some cases QM will be the first to become aware of needed changes. The policy will be changed and the draft circulated among managers or other employees as needed for input prior to going to QIC for final approval.

ROLES:

Executive Team Sponsor:

For the purpose of this policy, the Executive Team Sponsor is a member of the BHRS Executive Team. The development of any new policy must be approved and stewarded by a member of the BHRS Executive Team. An Executive Team Sponsor determines the need for new policy development in their area of oversight. The Executive Sponsor will be knowledgeable about all current BHRS policies related to their area of oversight. The Executive Sponsor will assign a policy content expert/project lead and subcommittees as needed to create and revise policies. Executive Sponsors will review all content area policies for accuracy and will submit documentation of these reviews to the Quality Manager by printing, signing and dating each new or revised policy. QM will initiate review and edits as needed.

Content Area Expert/Content Developer:

Assigned and directed by the Executive Sponsor. Is a knowledgeable individual who will lead in the development and review of policies in their area of oversight.

Quality Manager:

Responsible for the management of all current policies and initiates the revision or development of policies as needed.

BHRS Quality Improvement Committee (QIC):

Discusses and votes for approval of new policies and revisions for most BHRS policies and procedures prior to them going into effect. Compliance related policies are handled as described in the paragraph below.

Compliance & Delegation Oversight Committee:

The BHRS Assistant Director in his/her role as BHRS Compliance Officer chairs this committee. This committee is responsible for oversight of all compliance related policies mandated by law or regulation. Compliance policies are sent to the Compliance & Delegation Oversight Committee for approval. The BHRS Director will only accept for review compliance related policies with two-thirds approval of the Compliance & Delegation Oversight Committee. The QIC will be informed of compliance related policy revisions or new compliance policies and may submit feedback or questions to the Compliance & Delegation Oversight Committee; however, QIC will not vote on or provide oversight for compliance related policies.

BHRS Director:

Provides final review and approval of all BHRS policies. Works closely with the Executive Committee, Compliance Officer, and Quality Manager in all policy related matters.

BHRS QM Policy Committee: Manages all policies at the direction of the Quality Manager. Determines needs for training and education, makes recommendations to content area experts to conduct additional training or communication to ensure compliance with all current policies. Maintains indexes of current and obsolete policies. Posts policies on the Health System website at <http://www.smchealth.org>. Maintains signed hard copies of all policies in the QM office.

POLICY DEVELOPMENT:

1. Any individual or unit may identify the need for a new or revised policy whether for specific programs or system-wide applicability. An Executive Sponsor must agree to sponsor it. The Executive Sponsor will appoint a content area expert to develop and/or revise the policy. The Executive Sponsor will work with QM to disseminate and help implement it.
2. The content area expert develops the policy content in consultation with QM. At appropriate times during drafting of the policy, the document is shared with stakeholders for their comments. Input from the BHRS QM Policy Committee may be sought at this point in the process. The content expert, in consultation with the

Executive Sponsor, considers all feedback (solicited or otherwise) from other managers and other staff impacted by the policy and determines how to incorporate it. It is expected that the policy development and review process will include a representative group of staff, including some of those staff who will be impacted by the policy.

3. Once the policy has been sufficiently vetted it will be presented to the BHRS Quality Manager.

POLICY APPROVAL:

1. The Executive Sponsor approves the final draft version. It is then sent to the Quality Manager for review and presentation to the QIC or the Compliance & Delegation Oversight Committee for a vote. The Quality Manager must recommend/present the policy to the QIC prior to it being voted on.
2. If 51% of the voting members of the QIC approve the policy (with or without suggested edits) the Quality Manager will take the policy to the BHRS Director for final consideration and approval. If less than 51% of voting members approve the policy, it will not become a policy and it will be returned to the responsible Executive Sponsor with recommendations for further actions. If the BHRS Director does not give final approval for a policy passed by the QIC, it will be returned to the Quality Manager and/or the Executive Sponsor for follow-up.
3. For policies related to compliance, The Compliance & Delegation Oversight Committee requires the approval of two-thirds of the members before being sent to the BHRS Director for final review and approval.
4. Once final approval is obtained by the BHRS Director, QM will post the new policy on the Health System public website, maintain the original signed copy of the policy, update all indexes, and will either notify the system by email or ensure that the responsible Executive Sponsor or their designee notifies the system of the new or revised policy.

POLICY COMMUNICATION AND EDUCATION

1. The assigned content area expert assists the Executive Sponsor, as needed, in developing a plan for communication and/or training about new or significantly revised system-wide policies. The Executive Sponsor or content area expert will develop a communication and training plan and will establish oversight protocols and monitoring necessary to achieve ongoing compliance with the policy.

Approved: *(Signature on File)*
Stephen Kaplan, LCSW
BHRS Director

New Policy Need Identified

Policy Process Flowchart

