



# POLICIES & PROCEDURES

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# OBJECTIVES

- ▶ To understand the key components required in the policy/procedure manual.
- ▶ To understand the yearly review, provider involvement and implementation of policies.
- ▶ To learn the requirements of staff understanding of policies and what the surveyor reviews.

# CFR GUIDELINE

- ▶ 0055
- ▶ 491.9(b)(1)
- ▶ The clinic's health care services are furnished in accordance with appropriate written policies which are consistent with applicable State law.

- ▶ Written policies are consistent with clinic operations.
  - The policies include medical guidelines
  - The policies include program evaluation

- ▶ Clinic policies identify ALL the services that are performed onsite.
  - If you do it, you need a policy.
  - If you have a policy, you must follow it

- ▶ Follow CFR 42 for sections to create the policy manual.
  - Administration
  - Physical Plant and Safety
  - Organizational Structure (Human Resources)
  - Patient Care
    - Medical Guidelines
    - Laboratory
    - Patient Care additional policies
  - Medical records
  - Program Evaluation



# CFR GUIDELINE

- ▶ 0056
- ▶ 491.9(b)(2)
- ▶ Patient care policies are developed with the advice of a group of professional personnel that includes one or more physicians and one or more physician's assistants or nurse practitioners. At least one member of the group is not a member of the clinic staff.

- ▶ The Advisory Group has met within the past 12 months to review the clinic's policies.
  - This group includes a community member. This must be someone that is NOT paid under the TAX ID that is being reviewed.

# CFR GUIDELINE

- ▶ 0057
- ▶ 491.9(b)(3)
- ▶ The patient care policies include a description of the services the clinic furnishes directly and those furnished through agreement or arrangement; guidelines for the medical management of health problems which include the conditions requiring medical consultation and or patient referral, the maintenance of health care records, and procedures for the periodic review and evaluation of the services furnished by the clinic; and rules for the storage, handling, and administration of biologicals.

- ▶ Direct services offered at the clinic.
- ▶ Services offered through arrangement or agreement.
  - Consultation or referral.
    - Provider or diagnostic.
- ▶ Health Care records.
- ▶ Yearly review and evaluation.
- ▶ Storage, Handling and administration of biologicals.

# CFR GUIDELINE

- ▶ 0058
- ▶ 491.9(b)(4)
- ▶ The patient care policies are reviewed at least annually by the group of professional personnel which includes one or more physicians and one or more physician's assistants or nurse practitioners, and are reviewed as necessary by the clinic.

- ▶ Annual Advisory Group Meeting
  - Medical Director
  - Midlevel provider
  - Community Member
- ▶ Required to meet yearly and review, update and implement.

# STAFF UNDERSTANDING

- ▶ The manual is a tool to give guidance.
- ▶ Staff need to understand the components of the manual.
- ▶ Use as part of the orientation process.

# ADMINISTRATIVE POLICIES

- ▶ Business Associates Agreement
- ▶ Health Services
- ▶ Non-Discrimination Policy
- ▶ Patient Complaints
- ▶ Patient Rights and Responsibilities
- ▶ Schematic Floor Plan
- ▶ Smoke Free Environment

# PHYSICAL PLANT AND SAFETY

- ▶ Acts of Terrorism, Threats and Disturbances
- ▶ Cleaning Schedule
- ▶ Emergency Evacuation Plan
- ▶ Exposure Control Plan
- ▶ Failure of Essential Services
- ▶ Hazardous Materials Right-To-Know
- ▶ Inclement Weather
- ▶ Medical Waste Management Plan
- ▶ Physical Plant and Environment
- ▶ Preventive Maintenance
- ▶ TB Testing

# HR AND ORGANIZATIONAL STRUCTURE

- ▶ Credentialing Providers
- ▶ Job Descriptions
  - Medical Director
  - Physician (if applicable)
  - Non-Physician Provider
  - Nursing
  - Business Staff
  - Additional as required
- ▶ Mandatory Reporting for Licensed Professionals
- ▶ Organizational Chart
- ▶ Personnel Files
- ▶ Query of and Reporting to NPDB



# PATIENT CARE POLICIES

- ▶ Abdominal Pain
- ▶ Administration of Medication
- ▶ Adult Diabetic
- ▶ Adult Yearly Exam
- ▶ Adverse Drug Reactions
- ▶ Allergy Injections
- ▶ Anaphylaxis, Adult
- ▶ Anaphylaxis, Infant
- ▶ Care and Treatment of Minors

# PATIENT CARE POLICIES

- ▶ Chest Pain
- ▶ Contagious Patients
- ▶ Emergency Care
- ▶ Established Patient
- ▶ Gastroenteritis
- ▶ Infant Child Yearly Exam
- ▶ New Patient
- ▶ Sport Physical
- ▶ Upper Respiratory Infection
- ▶ Urinary Tract Infection

# PATIENT CARE-LABORATORY

- ▶ Clean Catch Midstream Urine/Female
- ▶ Clean Catch Midstream Urine/Male
- ▶ Culture Transmittal
- ▶ Glucose Monitoring/Log
- ▶ Hemoglobin/Log
- ▶ Laboratory Services
- ▶ Occult Blood/Log
- ▶ Pap Smear Patient Results Notification
- ▶ Proficiency Testing
- ▶ Strep A
- ▶ Urinalysis/Log
- ▶ Urine hcG
- ▶ Venipuncture



# PATIENT CARE-ADDITIONAL SERVICES

- ▶ Abbreviations and Symbols
  - ▶ Drugs and Biologicals/Storage, Maintenance, Disposal
  - ▶ Hand washing/Glove use
  - ▶ HIV Testing
  - ▶ Informed Consent/form
  - ▶ Notifying Patients of Abnormal Tests
  - ▶ Patient Exam Preparation
  - ▶ Patient Referral
  - ▶ Refusal of Treatment
- 

# PATIENT CARE-ADDITIONAL SERVICES

- ▶ Reporting Communicable Diseases
- ▶ Sample Medications/Log
- ▶ Sterile Field
- ▶ Sterile Supplies
- ▶ Tetanus Prophylaxis
- ▶ Universal Precautions
- ▶ Visual Acuity
- ▶ Vital Signs

# MEDICAL RECORDS

- ▶ Access and Denial of Patient Request for PHI
- ▶ Accounting of Disclosure of PHI
- ▶ Confidentiality
- ▶ De Identification of PHI
- ▶ Disposal of Patient Information
- ▶ Documentation Authentication Signatures
- ▶ Fax Transmittal of PHI
- ▶ Medical Record Audit Review
- ▶ Notice of Privacy Practices

# MEDICAL RECORDS

- ▶ Patient Rights to Amend PHI
- ▶ Permitted Use and Disclosure
- ▶ Printing or Copying of PHI
- ▶ Privacy Complaint
- ▶ Revocation of Use and Disclosure
- ▶ Security of Medical Records
- ▶ Storage of Medical Records

# PROGRAM EVALUATION

- ▶ Advisory Committee
  - ▶ Amending the Corporate Compliance Plan
  - ▶ Corporate Compliance Plan
  - ▶ Patient Satisfaction/Form
  - ▶ Policy Review
  - ▶ Quality Assessment and PI (Performance Improvement)
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# CIVIL RIGHTS

- ▶ Provider Based RHCs are required to have these for NEW RHC applications and CHOWs
- ▶ Website: :  
<http://www.hhs.gov/ocr/civilrights/clearance/index.html>
- ▶ You may download templates and fill in required information, but make it fit your clinic/corporation.

# REMINDER

- ▶ IF YOU DO IT, DOCUMENT IT.
- ▶ IF YOU DOCUMENT IT, DO IT.



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