

POLICY DEVELOPMENT AND MAINTENANCE

Direct Care and Treatment

Issue Date: October 2, 2018

Effective Date: November 6, 2018

DCT Policy Number: 110-1000

POLICY:

Direct Care and Treatment (DCT) follows a standard process for the development and maintenance of policies.

AUTHORITY:

Minn. Stat. § 246.014, subd. (d)

APPLICABILITY:

DCT-wide

PURPOSE:

To establish a policy process that complies with applicable licensing, accreditation, regulatory and legal standards and guides conduct reflecting the mission, vision, and values of DCT and the Department of Human Services (DHS).

DEFINITIONS:

DCT-wide – includes the following divisions/programs:

- Community Based Services (CBS) – Community Support Services (CSS), Minnesota State Operated Community Services (MSOCS), Minnesota Life Bridge (MLB), and Minnesota Intensive Treatment Homes (MITH).
- Forensic Services (FS) – Competency Restoration Program (CRP), Minnesota Security Hospital (MSH), Transition Services (TS), and Forensic Nursing Home (FNH), the Forensic Evaluation and all physical plant and support services.
- Mental Health and Substance Abuse Treatment Services (MHSATS) – Community Addiction Recovery Enterprise (C.A.R.E.) – Carlton, Fergus Falls, Anoka, St. Peter, and Willmar; Minnesota Specialty Health Systems (MSHS) – Brainerd, Willmar, Wadena, and Como; Community Behavioral Health Hospital (CBHH) – Baxter, Bemidji, Fergus Falls, Alexandria, Rochester, and Annandale; Anoka Metro Regional Treatment Center (AMRTC); and Child and Adolescent Behavioral Health Services (CABHS).
- Minnesota Sex Offender Program (MSOP)
- Includes all staff who work for DCT, including specific departments, such as: Medical Services, Operations Support Services (OSS) and the Office of Special Investigations (OSI).

Drafting Chair – employee appointed by the appropriate policy committee responsible for coordinating and leading a drafting team. The drafting chair ensures all associated work areas are included in the team.

Drafting Team – employees who draft or review a policy as assigned under the direction of an appointed drafting chair.

Policy - a document providing direction on how to carry out an objective or rule applicable as follows:

- DCT Policy – applicable to all of DCT. The Health Systems Chief Executive Officer is the signatory authority for DCT policies.

- Division Policy – applicable to one division in DCT. The division policy signatory authority is the associated division executive director.
- Program Policy - applicable to one or more program in a division of DCT. The program policy signatory authority is the associated division executive director.
- See DCT Policy Process (110-1000d).

Policy Archive - a complete electronic set of all historical policies, which includes:

- Final, signed policies;
- All past editions and track changes of what was changed and include any supporting information;
- Any unapproved change requests; and
- Pertinent historical information involving the policy or instruction development (including, but not limited to, resident family and advisory council suggestions, copies of correction orders, and email correspondence).

Policy Coordinator – a designated employee responsible for managing policies within a division or at the DCT level.

Policy Committee – leadership staff appointed by the executive director who review and approve policies.

Security Policy – a policy classified as security information pursuant to Minn. Stat. § 13.37 subd. 1(a), which must not be viewed by the public or clients served by DCT, with the following exceptions:

- Program licensing entities
- Other entities as authorized by the Health Systems Chief Executive Officer and/or division executive director or Minnesota Statutes, in consultation with records management.

PROCEDURES:

A. Policy System Management and Coordination

1. All policies are posted electronically, on the policy SharePoint.
2. Policies remain in effect until rescinded or superseded as outlined in this policy.
3. Unless specifically identified as security information pursuant to Minn. Stat. § 13.37, policies are public data.
4. The policy coordinator:
 - a) provides training to drafting chairs and teams to ensure timely policy development and revision;
 - b) provides training and education about the development, review, requirements and expectations of the policy process to staff as requested;
 - c) provides review and final editing of policy, which includes checking for spelling, proper grammar and appropriate sentence structure, prior to presentation to the policy committee;
 - d) schedules, organizes, facilitates and attends policy committee meetings;
 - e) maintains policy archives;

- f) maintains the policy share point site;
 - g) updates and maintains annual policy review/revisions list;
 - h) notifies drafting chairs when policies are due for annual review according to the schedule in D.1.;
 - i) tracks and documents annual review progress, including communication with executive leadership on all overdue annual policy reviews;
 - j) MHSATS: Chairs workgroups with program leaders, including creating and sending recurring placeholder outlook invites, creating agendas one week in advanced notifying the workgroup of the specific need and expectation to attend the specified workgroup meeting the following week;
 - k) CBS: Chairs workgroups with key staff and from all program areas, including creating agendas, notifying participants, posting policies to be reviewed to the SharePoint site at least two weeks prior to the scheduled meeting, manage the workgroup SharePoint site and bring completed policies to workgroup meetings;
 - l) prioritizes policy requests for drafting, in consultation with the policy committee;
 - m) finalizes policy after the policy committee approval, including obtaining executive signature(s);
 - n) issues announcements on the share point site regarding new and revised policies;
 - o) serves as the drafting chair for a policy when there is an urgent need for policy development/updates, and a drafting chair is not assigned or unavailable; and
 - p) serves as a liaison between policy committees.
5. The policy committee:
- a) reviews and approves all new and revised policies;
 - b) determines whether formal training and/or a communication plan is needed:
 - (1) if any formal training is needed staff work with the division the Learning and Development (L&D) and follow DCT policy 115-1005, "Review and Approval of Proposed New Training Requirements";
 - (2) if a communication plan is needed, develop and implement a communication strategy with key stakeholders;
 - c) assigns or approves drafting chair and drafting team member assignments;
 - d) reviews and approves proposals for new policy development and determines the policy due date; and
 - e) determines the deadline for new and revised policies if outside the scope of this policy.

6. The drafting chair:
 - a) serves as the policy subject matter expert, identifies drafting team members for the policy and consults with policy coordinator(s) or policy committee for input;
 - b) identifies additional drafting team members (may require the approval of the policy committee and/or supervisor);
 - c) obtains assistance from policy coordinators for policy language information, forms, etc., as needed;
 - d) coordinates drafting team meetings, ensuring all areas have the opportunity for input into the draft and any questions/issues are resolved;
 - e) approaches policy coordinators/policy committee for direction when the drafting team cannot reach consensus on an issue;
 - f) documents all consultations with policy stakeholders identified on the attachment Drafting Chair Policy Checklist (110-1000b) prior to finalization;
 - g) consolidates all checklist suggestions for edits and feedback on the policy draft;
 - h) consults with L&D staff to identify training needs, if needed, prior to presenting the policy at policy committee;
 - i) makes final edits that include checking for spelling, proper grammar, appropriate sentence structure and that all changes are tracked;
 - j) consults with the policy committee to determine the appropriate communication plan for implementation of the policy;
 - k) provides the finalized draft of the policy or revision, any new or revised attachments and the completed Drafting Chair Policy Checklist (110-1000b) to the policy coordinator;
 - l) attends the policy committee meeting to present a new policy or changes made to an existing policy;
 - m) responds to interpretations, questions after the policy is approved and issued; and
 - n) completes annual review of the policy with the policy drafting team.
7. Drafting team members:
 - a) ensure all draft policies have appropriate review/input from the specific division/program/department they are representing to address any concerns or impacts (including communication plans, implementation, training, etc.);
 - b) act as a liaison to staff/clients regarding communication plan and implementation of policies; and

- c) MHSATS: Utilize weekly or bi-monthly program specific policy review/revision workgroups as their drafting teams, these workgroups will be organized by the policy coordinator.
 - (1) Program line specific leaders will:
 - (a) provide support to the policy coordinator and co-chair the workgroup;
 - (b) identify the staff who will attend;
 - (2) regional leadership teams will attend and provide oversight to the workgroups.
- d) CBS: Utilize monthly or bi-monthly program specific policy review/revision workgroups made up of key staff from all program areas as their drafting teams, these workgroups will be organized by the policy coordinator.
 - (1) Agendas and policies to be reviewed are posted to the workgroups SharePoint site so review and comments may occur outside of meetings.
 - (2) Members are expected to come with comments/edits and policy is modified during workgroup meetings.

8. All Staff Responsibilities - Staff must:

- a) read and be familiar with all applicable policies;
- b) forward all comments to the drafting chair or members of the drafting team when a policy is in the revision or development process; and
- c) contact their supervisor if they want to become more involved in the policy process.
- d) Failure to comply with policies may be subject to disciplinary action, up to and including termination.

B. Policy Applicability - Policies are applicable as either:

- 1. DCT-wide policies;
- 2. division policies; or
- 3. program policies.

C. Requesting New Policies

- 1. Staff may submit requests for new policies to the appropriate policy coordinator using the Policy Request Form (110-1000c).
- 2. If the request is approved by the policy committee, the policy committee establishes a due date for policy completion. The policy coordinator works with the drafting chair in policy development.
- 3. If the policy committee denies the request, the policy coordinator drafts a response to the person making the request.
- 4. The policy coordinator maintains all approved and unapproved requests in the policy archive.

D. Annual Reviews

1. The policy coordinator notifies drafting chairs when policies are up for annual review according to the schedule below:

First quarter (July, August, September)	Part 1 - Administration and Management
Second quarter (October, November, December)	Part 2 - Client Services
Third quarter (January, February, March)	Part 3 - Healthcare
Fourth quarter (April, May, June)	Part 4 - Facility Operations

2. Drafting teams and drafting chairs conduct the annual reviews on all assigned policies within 90 calendar days as outlined above and makes recommended revisions when necessary. Only the appropriate policy committee can approve extensions of the deadline.
3. The drafting chair:
 - a) requests an editable version of the policy;
 - b) reviews the policy, consulting with a drafting team, if necessary;
 - c) sends the recommended tracked changes to appropriate stakeholders utilizing the Drafting Chair Policy Checklist (110-1000b); including the following required departments:
 - (1) legal (Assigned General Counsel's Office Attorney and MSOP Legal and Records Director); and
 - (2) quality/compliance:
 - d) sends the completed draft with tracked/recommended changes to the applicable policy coordinator who schedules the policy for presentation; and
 - e) presents the policy to the policy committee on the scheduled date.
4. For FS, CBS, MHSATS and DCT-wide policies: If there are no recommended changes, the drafting chair sends the policy to c. 1. and 2 above for review, and archives the checklist with the completed annual review. The policy coordinator documents completion of the annual review on the annual review share point site.
5. For MSOP policies: If there are no recommended changes, the policy coordinator documents completion of the annual review on the annual review share point site.

E. Policy Issuance

1. Standard Issue
 - a) The policy coordinator posts new and revised policies on the applicable share point site for issuance on the first Tuesday of the month. Policies become effective on the following month's first Tuesday, except CBS, where policies may become effective after the first Tuesday of the month to meet licensing requirements.
 - b) The review period for all issued policies is at least one month.
2. Emergency/Urgent Issue

Only the appropriate policy committee, in consultation with the appropriate executive director or the Health Systems CEO, may approve emergent/urgent policy issuance and determine the issuance and effective dates.

3. If the first Tuesday of the month falls on a holiday, policies are issued on the second Tuesday.

F. Attachments

1. Policies requiring staff to use an attachment (form), or any other document, must have the attachment instructions included in the body of the policy and listed under the attachments section. If possible, all attachments are:

a) stored on the DCT Policy Site, under DCT Forms; and

b) hyperlinked to the policy.

2. The policy coordinator ensures communication of issuance of new or revised attachments.

G. Definitions – All definitions listed under the definition section must be used in the body of the policy.

H. DCT will continue to convert all policies and procedures in the previous system (i.e. iNet, eManuals, etc.) into the DCT policy system, as identified in this policy, until all policies and procedures have been transitioned.

REVIEW:

Annually

REFERENCES:

None

ATTACHMENTS:

Drafting Chair Policy Checklist (110-1000b)

Policy Request Form (110-1000c)

DCT Policy Process (110-1000d)

SUPERSESSON:

DCT Policy 110-1000, “Policy Development and Maintenance”, October 3, 2017

DCT Policy 100-1010, “Drafting Committee Responsibilities”, November 1, 2016

All facility policies, memos, or other communications whether verbal, written, or transmitted by electronic means regarding this topic.

/s/

Marshall E. Smith

Health Systems Chief Executive Officer

Direct Care and Treatment

Department of Human Services