Unit 3 – Policies and Procedures

NCQA Reference: PCMH 1 – Element A, D, E, F; PCMH 4 – Element B; PCMH 5 – Element B

Objectives

- Review the concept of practice policies and procedures
- Review NCQA requirements for policy documents
- Review BizMed policy and procedure templates and resources
- Unit 3 Assignments

Practice Policy and Procedure Statements – Overview

Policies and procedures are organizational documents containing a formal description of rules and regulations that govern operations in the organization. Larger medical groups and health systems should already have a set of policies in place, while small private practices, and sole proprietors in particular, rarely bother with formal documentation of their business practices.

Common Policies for Medical Practices

- Privacy & Security (HIPAA, EHR, red flags ...)
- Medical Records (retention, disclosure, disposal...)
- Billing (patient payments, write offs, collections...)
- Communications (email, Internet, lab results...)
- Office Process (sharps, clean toys, scheduling...)
- Patient Relations (new patients, termination...)
- Clinical (meds renewal, narcotics, referrals...)

Purpose

Policies are usually put in place, whether in written format or verbal understanding in smaller practices for the following reasons:

- Regulatory – You have to have a written policy (audit)
- Standardize Staff Operations – For legal reasons, safety concerns, training of new employees, or per owner/governing-body business decisions

However policies and processes created based on those policies may be utilized to monitor and improve operational metrics, if they contain expected standards of performance or compliance with the policy statement.

To that end practice policies should also:

- Formally define measurable Practice Goals
- Enable measurement against stated Goals
- Facilitate improvement process to achieve Goals

In following units we will review examples of various policy making processes, and how these could assist a practice with meeting a variety of goal types, with particular emphasis on goals to promote and sustain primary care practice financial viability.
NCQA Requirements for Policies and Procedures

- Must be in place for 3 months
- Must include standards for performance

Policies and Procedures for JumpStart Level I

For the BizMed JumpStart Medical Home program the following policy documents must be in place:

- PCMH1A: Same-Day Appointments
- PCMH1A: Providing Timely Clinical Advice by Phone
- PCMH1D: Continuity of Care
- PCMH1E: Educating Patients about PCMH
- PCMH1F: Culturally and Linguistically Appropriate Services
- PCMH4B: Providing or Referring Mental Health Services
- PCMH5B: Referral Tracking

The above policies are addressed in depth in other units (Units 2, 9, 16). For this Unit, the policies should reflect your current operations.

Throughout this guide, items marked with a ★ have the potential to directly affect your practice’s financial viability and should be considered accordingly.

BizMed Policies and Procedures

In your BizMed Toolbox you will find the following resources to assist you with formulating policies for your practice:

- Examples of practice policies for operational processes listed above
- Resources with links to sources for these and other practice policy templates
- Instructions to assist you with retrieving BizMed policies and customizing them for your practice

Unit 3 - Assignment

This week your assignment is to review practice policies and customize them for your practice:

- Designate someone on your staff to review the policy statements in the BizMed Toolbox (see instructions materials for this unit)
- Customize the materials provided to fit the current needs of your practice
- Brand each policy with your practice identifiers
- Upload revised and branded documents to your NCQA dashboard for the appropriate Elements (see the list above for elements and descriptors)

Unit 3 – Materials

All materials are attached in the order listed below:

- Instructions for reviewing and customizing policies in BizMed
- Instructions for uploading policies to the NCQA Dashboard
Resources


2. Moghadas KI, Medical Practice Policies & Procedures, American Medical Association (AMA)  

3. The Importance of an Operations Manual at Your Medical Practice, Carol Stryker, Physicians Practice, Blog Post, August 2012  
   http://www.physicianspractice.com/blog/importance-operations-manual-your-medical-practice

   http://www.physicianspractice.com/blog/creating-operations-manual-your-medical-practice

5. Sweet Medical Center Policies and Procedures, example policies from a Community Health Center in Montana,  
   http://www.sweetmedicalcenter.org/Policies.html
Unit 3: Instructions

Reviewing and Customizing Policies in BizMed
Log into your BizMed Toolbox account and navigate to the Toolbox tab

On the left navigation panel click on the small grey triangles to the left of each folder in the order illustrated above to display the policy materials.

Click on any document to read, download or print. On the browser dialog box click Open to view the policy

Each document is an editable Microsoft Word template that you can customize with your practice name and use in your practice (see preview below).
When Microsoft Word opens, first enable Editing by clicking on the yellow button at the center top.

Now you can enter your practice name and address at the top left and edit the highlighted areas of the text to match your practice operations, plans and goals. If you are not sure what your goals should be, leave the document as is, until we reach the pertinent Unit of learning. Note that on the right margins of each document, there are prefilled annotations for NCQA. Do not edit these boxes.

At the bottom of each document, you will find a signature line and an effective date. Make sure you sign each policy document after it meets your approval.

Save each document to your local computer after you complete this first round of edits.
Uploading Policies to the NCQA Dashboard

Once you have a policy that works for your practice, either an existing one that you are already using or a new one created from the materials supplied in BizMed, you will need to upload the document to your NCQA Dashboard.

Note: Make sure your policies are approved, dated and signed.

To upload your policies, log into your BizMed Toolbox account and navigate to your PCMH project by clicking on the My Projects tab

Note: If your practice has multiple sites, you will need to repeat this process for each site in your practice.

In your PCMH project click on the name of the site you are working on. Next click on the Tools folder and finally click on the NCQA Dashboard

Navigate to the PCMH Standard indicated for each particular policy.
Example: PCMH 1A – Open Access and Continuity of Care Policy

Navigate to PCMH 1 tab and click on the small grey triangle next to Element A and note that the uploaded documents column under Policies/Process is highlighted, denoting that you need to upload documents.

To upload your policies, click the upload icon on the far right of each factor and follow the instructions provided in Unit 4 for uploading clinical guidelines.

Linking Existing Documents to Other Elements/Factors

You will note that some policies are labeled to satisfy more than one NCQA Factor. For example the Open Access and Continuity of Care Policy for PCMH 1A is also applicable to PCMH 1D. You do not need to upload the document twice. Once you upload the policy for PCMH 1A, you will be able to “link” it to PCMH 1D.

Locate Element D by scrolling down from your currently open Element A and click on the grey triangle to the left of its title. Element D will now expand and you will note that Factor #1 requires a policy document. Click on the blue upload icon as you did previously to upload a new document.
In the upload dialog select Existing and go through the three dropdowns to reach PCMH 1-Element A-Factor 1, which is where your Policy resides. All documents linked to PCMH 1A-1 will display. Select your policy by clicking on it, and click the Copy button.
Your Policy will be linked to PCMH 1D-1

Close the dialog and note that the Policies column in 1D is no longer highlighted and it shows 1 document available.

To view, or edit or download again, any of your documents, use the View Uploaded Documents link on the right (see instructions for Unit 4 – Clinical Guidelines).