

POLICY DEVELOPMENT AND MAINTENANCE

Direct Care and Treatment

Issue Date: October 3, 2023

Effective Date: October 3, 2023

DCT Policy Number: 110-1000

POLICY:

Direct Care and Treatment (DCT) follows a standard process for the development, review, implementation and maintenance of organizational 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.

DEFINITIONS:

Attachment – any structured collection of data in any medium to facilitate documentation of information.

- DHS Forms – forms developed by DHS and approved for use by all DHS entities
- Client Record Forms – forms included in the medical or treatment record. DCT utilizes paper and electronic health record forms (e.g. Avatar, Phoenix, etc.)
- Procedural Forms – forms developed for use within DCT that could be an informational document, such as a diagram, handbook or other supplemental information
- External Forms – forms used within DCT but managed by an external entity (e.g. Department of Health, Minnesota Management and Budget (MMB), etc.)

Biennial – taking place every other year.

Client – people served by DCT. Depending on the type of service, other terms may be used, including, but not limited to, patient, individual, consumer, or a person receiving services.

DCT-wide – includes the following divisions and programs:

- Ambulatory Services
 - Facility Dental Clinics – includes the three ambulatory care dental services clinics within DCT facilities (MSOP in St. Peter and Moose Lake, FS and AMRTC)
 - Special Care Dental Clinics – includes the five outpatient ambulatory care dental services clinics in Brainerd, Cambridge, Faribault, Fergus Falls, and Willmar.
 - Ambulatory Psychiatric Services
 - Ambulatory Primary Care Services
- Community Based Services (CBS)
 - Community Support Services (CSS)
 - Minnesota State Operated Community Services (MSOCS)
 - Minnesota Life Bridge (MLB)
 - Child and Adolescent Services (including Minnesota Intensive Treatment Homes (MITH))

- Forensic Services (FS)
 - Forensic Mental Health Program (FMHP)
 - Forensic Nursing Home (FNH)
 - Community Integrated Services (CIS)
- 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)
 - Child and Adolescent Behavioral Health Hospital (CABHH)
- Minnesota Sex Offender Program (MSOP)
 - St. Peter
 - Moose Lake
 - Community Preparation Services (CPS)
 - Reintegration
- Includes all staff who work for DCT, including specific departments, such as:
 - Medical Services
 - Operations Services (OS)
 - 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 drafting team.

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

Legal Department – see definition in DCT Policy 130-1000, “Responding to Legal Actions”.

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

- DCT-wide Policy – applicable to two or more divisions of DCT. The Health System Chief Executive Officer (CEO) and/or the executive medical director are the signatory authority(ies) for DCT-wide policies.
- Division Policy – applicable to one division in DCT. The division policy signatory authorities are the associated division executive director and/or the division medical director.
- Program Policy - applicable to one or more program(s) in a division of DCT. The program policy signatory authorities are the associated division executive director and/or the division medical director.

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

- Final, signed policies;
- Past editions and tracked changes of what was changed and include any supporting information; 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 Committee – leadership staff appointed by the executive director who review and approve policies.

Policy Coordinator – a designated employee responsible for managing 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 System CEO and/or division executive director or Minnesota State Statutes, in consultation with legal department staff or the DHS Data Privacy Official.
- Policies are identified with the words “Security Policy”, in red, under the division title

Workgroup - for the purposes of this policy, representatives of the program areas and professional support service areas within the division, that perform the role of drafting team for assigned division policies.

PROCEDURES:

A. Policy System

1. DCT ensures all policies are posted electronically on the policy SharePoint site timely and consistently.
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, all policies are public data.

B. All Staff Responsibilities

1. Staff must:
 - a) know how to access and locate all DCT wide and division/program policies;
 - b) read and be familiar with all DCT-wide and applicable division/program policies;
 - c) review all DCT-wide and applicable division/program standard and special issuance home page announcements and subsequent policies;
 - d) forward any suggested changes to the drafting chair or members of the drafting team when a policy is in the revision or development process; and
 - e) contact their supervisor if they want to become more involved in the policy process.
2. Staff may be subject to disciplinary action, up to and including termination for failure to comply with policies.

C. Policy Applicability

1. Policies are applicable as either:
 - a) DCT-wide polices;
 - b) division policies; or
 - c) program-specific policies.

2. DCT-wide policies may exclude specific divisions and/or programs based on applicability of regulation, subject matter, programming, etc.

D. 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.
3. The policy coordinator maintains all approved and denied requests in the policy archive and works with the drafting chair and drafting team in policy development.

DI. Policy Issuance

1. Standard Issuance
 - 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.
 - b) If the first Tuesday of the month falls on a holiday, policies are issued on the second Tuesday.
 - c) The review period for all standard issued policies is at least one month.
2. Special Issuance
 - a) DCT uses a special issuance when policies are issued outside of the standard issuance.
 - b) The appropriate policy committee approves special issuance and determines issue and effective dates.

DII. Policy Management and Coordination

1. The policy coordinator:
 - a) provides guidance to:
 - (1) drafting chairs and teams to ensure effective policy development and revision; and
 - (2) all staff, as requested, about the development, review, requirements, and expectations of the policy process;
 - b) 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;
 - c) schedules, organizes, and facilitates policy committee meetings;
 - d) maintains policy archives;
 - e) maintains the policy share point site;
 - f) updates and maintains biennial policy review list;

- g) notifies drafting chairs when policies are due for biennial review according to the schedule in Procedures G.1. of this policy;
 - h) tracks and documents biennial review progress, including communication with executive leadership on the progress of all policy reviews;
 - i) prioritizes policy requests for drafting, in consultation with the policy committee;
 - j) finalizes policy drafts after the policy committee approval, including obtaining executive signature(s);
 - k) issues announcements on the share point site regarding new and revised policies and attachments;
 - l) 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 is unavailable;
 - m) serves as a liaison between policy committees;
 - n) sends out the agenda prior to the policy committee meeting so the committee members can review the drafts before attending the meeting;
 - o) MHSATS: chairs workgroups with program leaders, including creating and sending recurring placeholder outlook invites, creating agendas one week in advance, notifying the workgroup of the specific need and expectation to attend the specified workgroup meeting the following week; and
 - p) 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;
 - q) Ambulatory Services: chairs workgroup and works with key staff to ensure policy biennial review completion and new policy development progress.
2. The policy committee:
- a) members:
 - (1) review all new and revised policy drafts prior to attending the policy committee meeting;
 - (2) bring all comments/questions/suggestions to the meeting for discussion;
 - (3) send a designated back-up if they are unable to attend the meeting; and/or
 - (4) send their comments via email to the drafting chair, policy coordinator or Policy Director to bring to the meeting when they are not able to attend:
 - b) approves all new and revised policies;
 - c) is consulted when policy drafting chair assignments are made;

- d) reviews and approves proposals for new policies and determines the new policy's due date; and
 - e) determines the deadline for new and revised policies if outside the scope of this policy.
3. The drafting chair:
- a) completes the biennial review of the policy in collaboration with the drafting team;
 - b) serves as the policy subject matter expert, identifies drafting team members (may require the approval of the policy committee and/or supervisor of potential drafting team member) for the policy and consults with policy coordinator(s) or policy committee for input;
 - c) obtains assistance from policy coordinators for policy drafts, 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 on the appropriate checklist prior to finalization:
 - (1) DCT-wide Policies – Use DCT-wide Policy Checklist (110-1000a);
 - (2) Division/Program Policies – Use Division Policy Checklist (110-1000b);
 - g) consolidates all checklist suggestions for edits and feedback on the policy draft;
 - h) consults with Learning & Development (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 ensures all changes are tracked;
 - j) provides the finalized, tracked changes draft of the policy or revision, any new or revised attachments and the appropriate, completed policy checklist to the policy coordinator;
 - k) attends the policy committee meeting on the scheduled date to present a new policy or changes made to an existing policy; and
 - l) consults with the policy committee to determine the appropriate communication plan (other than the homepage announcement) for implementation of the policy; and
 - m) responds to questions after the policy is approved and issued.
4. 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.); and
- b) act as a liaison to staff/clients regarding implementation of policies.

5. Workgroups

- a) 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; and
 - (b) identify the staff who will attend.
 - (2) Regional leadership teams will attend and provide oversight to the workgroups.
- b) 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.
- c) Ambulatory Services: Utilize monthly workgroup meetings as their drafting team(s) for new policy development and biennial reviews. The policy coordinator chairs and organizes the workgroup meetings.

G. Biennial Reviews and At-Need Revisions

1. All policies will be reviewed biennially according to the Biennial Review Schedule (110-1000d), unless otherwise required by licensing, statute or other regulatory agencies. Each division is responsible to identify policies that must be reviewed outside of the biennial review schedule and establish a review schedule to meet requirements on the Exception to Biennial Review Process (110-1000e) attachment.
2. Biennial reviews are considered completed when the policy coordinator receives the completed checklist from the drafting chair.
3. Biennial review with no recommended changes:
 - a) Ambulatory Services, FS, CBS, MHSATS and DCT-wide Policies: The drafting chair sends the policy to the required checklist for review. The policy coordinator documents completion of the biennial review on the biennial review SharePoint site and archives the checklist.
 - b) MSOP Policies: The policy coordinator documents completion of the biennial review on the SharePoint biennial review list.

4. At-need revisions are completed as necessary and follow the same checklist process as a biennial review.

H. Policy Format

1. Attachments
 - a) Policies requiring staff to use an attachment must have the attachment included in the body of the policy and be listed under the attachments section.
 - b) The policy coordinator includes communication of new or revised attachments uploaded to the DCT policy site on the standard or special issuance SharePoint site announcement.
2. All listed definitions must be used in the body of the policy or on an attachment.

REVIEW:

Biennially

REFERENCES:

DCT Policy 115-1005, "Training Requirement Approval"

ATTACHMENTS:

DCT-wide Policy Checklist (110-1000a)

Division Policy Checklist (110-1000b)

Policy Request Form (110-1000c)

Biennial Review Schedule (110-1000d)

Exception to Biennial Review Process (110-1000e)

SUPERSESSON:

DCT Policy 110-1000, "Policy Development and Maintenance", September 6, 2022

/s/

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