

What Is A Policy and Procedure Document And What Does It Do:

Policies and procedures form the backbone for an organization. They help align the missions and goals of the organization, the applicable Administrative Code(s), federal, state and local laws, and the processes by which the work is to be done. It serves as a consistent source for organizational policy, which are the overall regulations that govern the business, and the procedures that define how those policies will be implemented. Therefore, writing them well will help keep the organization on path and ensure that standard procedures are being conducted the same way by all staff. The policies spell out for all employees what is expected of them and how to accomplish it.

A well written policy and procedure document will serve the organization in the following ways:

1. Protect the organization: It provides evidence that the standards of practice within an organization meet all applicable legal and ethical standards.
2. Allow the organization to operate more efficiently and effectively: It provides consistency in, and coordination of, agency operations. It also outlines lines of authority/supervision.
3. Assist in conflict resolution: It clearly delineates the responsibilities of all members.
4. Streamline staff orientation and training: Policies and procedures are used to orient and train new staff as well as refresh experienced staff.
5. Assurance for referral sources and the general public: Written policies and procedures, based on current Administrative Code(s), help assure the public and referral sources that ADMH Certified agencies provide and monitor competent treatment carried out by appropriately credentialed staff in a safe environment.
6. Identification of and response to problems: Written policies and procedures provide an operational baseline by which agencies can identify and generate solutions for problems that occur in administering and delivering services.
7. Assist in new member recruitment: Policy and procedures clearly outline your agency processes for interested individuals.
8. Set a positive direction for the organization: It will help align goals and missions with day-to-day operations.
9. Provide a way to review existing programs and services: Clearly defined policies and procedures give a tool by which existing programs and services can be measured. Used effectively, clearly defined policies and procedures is an additional tool that may be used for quality assurance and hold staff accountable in program and service delivery.
10. Provide a resource for all staff to use when they have a question on how an agency is implementing the Administrative Code, federal, state and/or local laws/regulations. It is the "how to guide" resource that clarifies and explains the expectations for agency staff when they have a question about an Administrative Code, etc.
11. Remain in compliance with all rules, regulations and policies associated with *current* ADMH Administrative Code(s).

Why Separate Policies and Procedures:

Policies reflect governing Rules and are general in nature. Procedures indicate the specific implementation of a given policy. Policies adapt to changes in Administrative Code. Procedures, in addition to adapting to changes in policies, should also evolve with new tools and methods of treatment. This separation will ultimately serve to distinguish what is based on rules and what are the existing standards of practice.

Where to Begin:

You must begin by assembling all applicable ADMH Administrative Code(s). All applicable Administrative Codes become the foundation of your new policy and procedure manual. In the absence of all else, these

things must be satisfied.

The key to writing strong procedures and policies is to make the documents rigid enough to clearly indicate the rules of the organization, but flexible enough to be able to be followed easily and without significant deviation.

Organizational and Treatment Program Introduction:

Providing an introduction to the policy and procedure manual can establish a clear picture of the organization's history, mission, vision, and overall structure. This information will allow those who work with your agency to get a sense of your organization and to better comprehend how their activities fit into the overall framework. This information is useful for training staff and volunteers, as it will allow them to align themselves and their work with the philosophies and ideologies of the organization. Additionally, providing an introduction to the agency's treatment program, inclusive of relevant treatment curricula and evidence-based practices utilized, helps establish a context for the agencies processes outlined within the policies and procedures.

5 Steps to Policy and Procedure Development:

The following is a sample method of putting policy and procedure together for your manual.

- 1) Identify policy needs and Administrative Code(s) requirements
 - 2) Draft policy
 - 3) Approve policy
 - 4) Implement
 - 5) Review and evaluate
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- 1) Identify policy needs and Administrative Code requirements
 1. Review underlying concerns. Ask, "Do we have a policy about...?" Then, "Do we need a policy about...?"
 2. Relate to agency philosophy, values, mission, goals and Administrative Code.
 3. Collect information that will help you draft the policy.
 4. Describe desired outcome. What do you want this policy to do when implemented?
 - 2) Draft policy and procedures:
 1. Make it as clear as possible. Use plain language, be brief and to the point.
 2. Be certain it is in agreement with current Administrative Code(s).
 - 3) Approve policy and procedure per Administrative Code
 1. Governing Body approves policy and procedures.
 2. Governing Body signs and dates the policies at time of policy approval.
 3. Add to policy and procedure manual.
 - 4) Implement policy
 1. Communicate policy to all agency staff.
 2. Notify staff of effective or revised dates.
 - 5) Review and evaluate per Administrative Code or sooner if determined by Governing Body
 1. Review regularly.
 2. Evaluate effectiveness in service delivery.
 3. Is the policy applicable and relevant?
 4. Adapt to meet changing situations, modifications in licensure or designation or revision of Rule.

Writing Procedures

Procedures make policies operational. They are comprehensive action statements consisting of three key elements: **what** is to be done; **when** it will be done; and **who** will do it, not necessarily in that order. In the following examples, the **key elements** in each procedure are bracketed and in bold type.

Example 1:

(Policy)

Service plan reviews shall be completed and documented when there is a change in the individual's level of functioning, or when individual-related events occur that significantly affect planned treatment outcomes and/or lengths of stay in treatment, and within timeframes identified in current Rule, based on level of care.

(Procedures)

1. **[who]** Clinicians **[what]** shall schedule clients for service plan reviews and revisions **[when]** according to the current Rule requirement from the creation of the initial services plan and within the current Rule requirement thereafter.
2. **[who]** Clinicians and the clinical director **[what]** will evaluate individual treatment-related events to determine whether they have a significant impact on treatment outcomes, length of stay or other important aspects of individual treatment. When events are evaluated as having significant impact on individual treatment, **[who]** clinicians **[what]** shall schedule service plan reviews with clients **[when]** within 72 hours following evaluations.

Example 2: (Policy)

Qualified staff shall be certified or licensed addiction counselors whose credentials are current and in good standing.

Note: As previously mentioned, rules are usually too general in scope to be used as operating policies. However, some Rules are written so specifically that they translate directly to a policy statement. The above policy is an exact translation of such a Rule.

(Procedures)

1. **[what]** Copies of addiction counselor certificates and/or licensure shall be kept in clinician personnel files and their current status shall be checked **[when]** at least once per year by **[who]** the clinical director or a staff person specifically designated by the clinical director.
2. **[who]** The director **[what]** shall make sure that the need for certified and licensed addiction clinicians is emphasized **[when]** in all advertising for new clinicians.

Note: In 2. above, **[when]** is implied by the phrase, "in all advertising for new clinicians," since it is at the time the agency advertises for new counselors that addiction counselors or licensed persons will be emphasized.

3. **[who]** QSAPs **[what]** shall complete all required courses and supervised clinical hours required to obtain certification **[when]** within thirty (30) months of hire. **[who]** The clinical director **[what]** shall oversee and report their progress to the director **[when]** on a monthly basis.

Updating Policy and Procedure Documents:

Policy and Procedure documents should be regularly updated, so as to ensure that they are in accordance with current Administrative Code(s) and per Administrative Code(s), as well as being reflective of current best practices. It is likely that the policy and procedure document was comprehensive and efficacious at its inception, but changes in Administrative Code(s) and practices have since rendered it obsolete. On the other hand, a policy and procedure document may have initially been written too vaguely and, therefore, difficult to follow, which would also necessitate a review and update. The question is always 'do these policies and their procedures allow us to most efficiently and effectively do our work?'

Therefore, it can be most helpful to set aside time at least annually per Administrative Code, to review, revise, and update the policy and procedure document. Assign a particular individual to being in charge of keeping the document current.

Further, there is also an obligation to keep in mind the interest of those who will be impacted by any changes. It is, further, an obligation to ensure that all those expected to operate under a revised set of policies and procedures be made fully aware of any and all changes. Upon revision of Administrative Codes, agency policies and procedures shall be updated within 30 calendar days of effective date of changes in Administrative Code(s).

In Summation:

Writing a thorough policy and procedure document can feel like an overwhelming task. However, done correctly it will ultimately save your organization both time and money while increasing productivity. Therefore, the more work put into the creation of the document, the more benefit that will be realized. An applicant agency can use its own numbering system for its policies and procedures, but it speeds up the review process if they are in the same order as the Administrative Code on which they are based. The key in writing policy and procedure documents is to not make your manual overly restrictive. Write your procedures to meet the mandatory requirements as outlined by applicable and current Administrative Code(s), laws and rules. Next, write your procedures to ensure consistency in the areas where operational demands obviously require consistent behavior. Steer clear, however, of too many "thou shalt not" type statements and leave your staff some discretion as to how to accomplish their tasks. The Policy and Procedures manual should be viewed as a guide for current, as well as new members to the organization. This then puts the imperative on keeping the document clear, concise, and easy to follow. Also, the manual should not be viewed as a static tool, rather it something that is to evolve with the changing world in which the specified services are to be provided.

Example Administrative Code taken from SA Administrative Code 580-9-44-.13 (6) Program Description - Screening

- (1) Screening. The entity shall develop, maintain, and document implementation of written policies and procedures for a screening process to briefly screen individuals prior to initiation of a behavioral health screening or diagnostic interview examination, or early intervention, treatment, or recovery support service. At a minimum, this process shall:
 - (a) Identify the presence of risk factors for a substance use or substance use and co-occurring mental disorder.
 - (b) Specify when and where the screening process may take place.
 - (c) Specify the instruments utilized to conduct the screening process.
 - (d) Describe the procedures followed when the screening process:
 1. Identifies risk factors for a substance use or co-occurring substance use and mental disorder.
 2. Does not identify risk factors for a substance or co-occurring substance use and mental disorder.
 3. Identifies the need for crisis intervention.
 - (e) Specify the procedures for documenting the screening process.
 - (f) The entity shall document that the results of the screening are clearly explained to the client and to the client's family as appropriate.

(g) The entity shall submit screening data to the DMH management information system, ASAIS, as according to the most recent edition of Data Reporting Guidelines established and published by DMH, incorporated herein by reference.

To turn this rule into a policy, highlight the parts of the rule that tell the reader what needs to be done to follow the rule. Here it is again, with the action parts highlighted:

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(f) The entity shall document that the results of the screening are clearly explained to the client and to the client's family as appropriate.

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Here is an example of what this policy might look like:

Agency ABC staff (you identify who – counselor, person who answers the phone, etc.) are responsible for the following screening of individuals requesting services prior to the initiation of the Placement Assessment and other diagnostic interview. This screening takes place at the first point of contact – phone call or walk in the clinic utilizing the UNCOPE for Adults or the CRAFT for Adolescent. The purpose of this screening is to identify immediate needs relating to risk factors for substance use disorder, co-occurring disorders and/or crisis intervention. If the UNCOPE or CRAFT identifies risk factors, the recipient is immediately scheduled for ADMH Placement Assessment. If recipient is in crisis, appropriate interventions will be conducted by qualified staff and referral to any needed interventions/services will be completed and documented by qualified staff.

The following will be documented in the recipient's record by staff completing the screening tool:

1. The staff completing the screening will document in the recipient's record the screening process was completed.
2. The staff completing the screening will discuss the results of the screening with the recipient and document that the results of the screening were clearly explained to the recipient and the recipient's family as appropriate.

The Data management staff member will submit screen data to the ADMH management information system as according to the most recent edition of Data Reporting Guidelines established and published by ADMH, incorporated herein by reference.