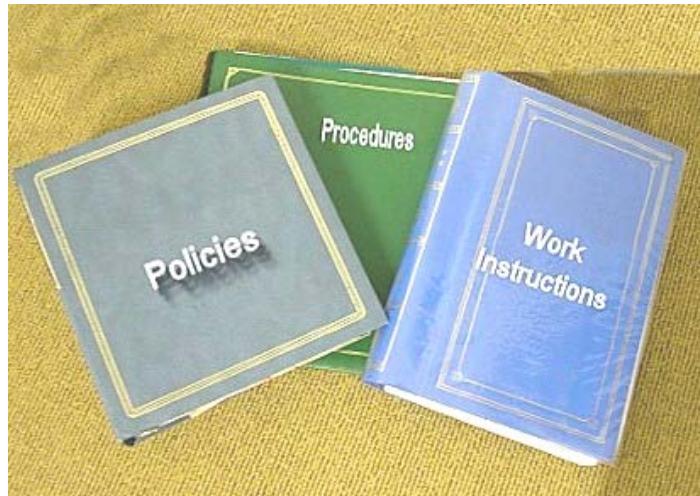




MODULE 6



**RULE COMPLIANCE,
POLICIES AND PROCEDURES**

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Mission Statements

Every organization needs to define its fundamental purpose, philosophy, and values. The mission statement clarifies the essence of an organization's existence. It describes the needs an organization was created to fill and answers the basic question of why it exists. The mission statement provides the basis for judging the success of the organization and its programs.

A powerful mission statement attracts donors, volunteers, and community involvement. It helps the organization and its stakeholders to verify whether the organization is doing its intended job and making the right decisions.

It provides direction when the organization needs to adapt to new demands, helps the board to stay true to its primary purpose, and serves as a touchstone for decision making during times of conflict.

The mission statement can also be used as a tool for resource allocation.

What is your mission statement? Is your mission statement on your agency's letterhead?

On the next page there some samples of Mission Statements for agencies:

Mission Statement - Department of Human Services Division of Developmental Disabilities

The Illinois Department of Human Services, Division of Developmental Disabilities provides leadership for an effective management of the design and delivery of quality outcome-based, person-centered services and supports for individuals who have developmental disabilities. These services and supports will be appropriate to their needs, gifts, talents and strengths; accessible; life-spanning; based on informed choice; and monitored to ensure individual progress, quality of life and safety.

Mission Statement – Illinois Department of Public Health:

Promotes the health of the people of Illinois through the prevention and control of disease and injury.

We, as a diverse public health workforce, care about the well-being of people and are guided by the following principles:

- Prevention of disease and injury
- Protection of food, water, air and environment
- Promotion of safe and healthy communities
- Scientific approaches to analyzing and solving problems
- Partnership and collaboration to achieve coordinated response to community health issues
- Population-based strategies to address public health issues
- Individual responsibility as important to achieving healthy lifestyles
- Advocacy for public health policies to improve the health of populations
- Recognition of the unique value and needs of diverse populations
- Innovation as essential to the practice of public health

Mission Statement - Council on Accreditation

The Council on Accreditation (COA) partners with human service organizations worldwide to improve service delivery outcomes by developing, applying, and promoting accreditation standards.

Mission Statement – Illinois Environmental Protection Agency

The mission of the Illinois Environmental Protection Agency (IEPA) is to safeguard environmental quality, consistent with the social and economic needs of the State, so as to protect health, welfare, property and the quality of life.

Defining Policies and Procedures

It is important for all individuals within your agency to be involved in the development and implementation of policies and procedures and to have an understanding of what policies and procedures are.

Written policies can prevent chaos, confusion, and legal problems. Policies provide less chance that the administrator or executive director will make an illogical, irrational, or possibly even an illegal decision. Such decisions may disrupt employee relations and workplace harmony, and run afoul of government and agency regulations.

A policy is a definite course or method of action to guide and determine present and future decisions. A policy is also a guide to decision making under a given set of circumstances. Policies are usually based upon accepted, well-defined norms/standards of practice. Norms/standards are needed to establish consistency; expectations and patterns for practice. Norms/standards articulate what is done, who is served, and what services and resources are needed. In addition, standards provide a benchmark for quality measurement and improvement.

A procedure is a particular way of accomplishing something, an established way of doing things, a series of steps followed in a definite order ensuring the consistent and repetitive approach to actions.

Why Do You Need Policies and Procedures?

The main purpose of having policies and procedures is to establish a high degree of understanding, cooperation, efficiency and unity among employees of your agency or facility, fostered by a systematic application of good procedures in personnel management. Another purpose is to provide uniform policies for all employees with all the benefits such a program ensures, without regard to race, color, creed, religion, national origin, gender, age, disability or political affiliation.

The fundamental objectives of these personnel management policies are to:

- Promote and increase efficiency and economy among employees;
- Provide fair and equal opportunity to all employees and qualified applicants on the basis of demonstrated merit and fitness as ascertained through fair and practical methods of selection;
- Develop a program of recruitment, advancement, and tenure that will make employment with the agency/facility attractive as a career and encourage each employee to render the best service; and

- Establish and promote high morale among the employees by providing good working relationships, a uniform personnel policy, opportunity for advancement, and consideration for employee needs and desires.

Reflecting Agency Values, Ethics and Principles in Policies and Procedures

All supervisors should be trained about policies and procedures. A large number of suits brought against organizations are because, although the organizations had clear policies, supervisors did not enact the policies because they did not understand them.

Below is a CBTA on Policies and Procedures. Answer the questions based on your agency's Policies and Procedures.

1. Do our Policies and Procedures reflect the mission and vision of our organization/agency? How do you verify/incorporate?
2. Are policies and procedures written in a clear, understandable manner-- preferably at an 8th grade reading level? Are they "user friendly"? How could you find out?
3. Are they person-centered? How could you find out? What are some "key" words?
4. Do policies and procedures reflect "best practice" in the field of developmental disabilities? How could you find out?
5. Does your Human Rights Committee review your policies and procedures for rights restrictions?
6. Are policies and procedures written to clearly protect the safety and well being of persons supported?
7. How often are the policies and procedures updated and by whom? Do those who use them the most have input into their creation/revision?
8. Do policies and procedures have built-in prompts for staff to adhere to certain time frames? For example: (twice yearly in January & July, etc.)
9. In what ways do our policies and procedures address the requirements of monitors, surveyors, rules, mandates, etc?
10. How is staff trained in policies and procedures? Do you we use competency-based training materials?

11. Do we follow our own policies and procedures? Do we ever deviate or make exceptions? If so, what method of approval do we have in place?

No policies and procedures manual should ever be regarded as "complete" in the sense that it will never change. The best manual is the one that is geared to continuous growth over time and incorporates design features that make this kind of growth possible.

A well thought out manual can enable just about everyone in your organization the ability and flexibility to make the right decisions in his or her job responsibilities.

Developing Policies and Procedures

Agencies develop policies and procedures to define issues relevant to the agency or facilities programs and services, including: goals and objectives, services provided, roles and responsibilities of staff, and existing regulations, standards, and guidelines important to the care of persons served.

The contents of your policies and procedures manual will depend on the nature and needs of your organization.

Each policy should include wording to the effect that the policies are for general guidance in the relationships between employees and the organization, the board has authorized the policy, that policies can be changed at any time and that the policies do not constitute a contract between the organization and the employee.

A policies and procedures manual guides both managers and employees as to what is expected and can prevent misunderstandings about what is permissible and what will work well. In addition, supervisors and managers are more likely to consistently apply policies that are clearly communicated in writing.

What are the characteristics of good policies and procedures documents?

Good Policies

- Policies are written in clear, concise, simple language
- Policy statements address what is the rule rather than how to implement the rule
- Policy statements are readily available to staff and their authority is clear
- Designated “policy experts” are identified and readily available to interpret policies and resolve problems
- As a body, they represent a consistent, logical framework for action

Good Procedures

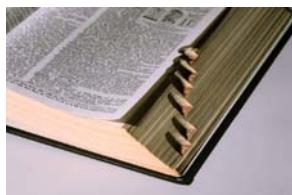
- Procedures are tied to policies. Making explicit the relationship along with how the procedure helps the agency achieve its goals or strategic plan helps ensure understanding and compliance
- Procedures are developed with the user in mind
- There is a sense of ownership among procedure users.
- The procedures are understandable.

Writing Style for Policy and Procedure Documents

- Concise, minimum of verbiage
- Factual – double-check accuracy
- Don’t include information that may be quickly outdated
- If you use an acronym, spell it out the first time you use it
- Include step-by-step instructions for completing forms (*procedures only*)
- Not too technical – simple enough to be understood by a new employee

Design and Layout of Policy and Procedure Documents

- Generous use of white space
- Presentation is structured so that the user can quickly focus on the aspect of policy or procedure relevant to the task at hand
- Use a flexible outline style to make the document easy to modify (and therefore keep up-to-date)
- Use labels to introduce key points (headings and labels in margins need to be consistent)



The policies and procedures must adhere to the mandates of the following Rules. Rule 115, 119, 116, 350.

Section 115.100 Purpose – CILA Rule

- Licensure and Certification Act [210 ILCS 135] is to license agencies to certify living arrangements integrated in the community in which individuals with a mental disability are supervised and provided with an array of needed services.
- The objective of a community-integrated living arrangement is to promote optimal independence in daily living and economic self-sufficiency of individuals with a mental disability. Agencies planning to develop and support community-integrated living arrangements shall do so pursuant to Department licensure in accordance with this Part.

Section 119.200 - General requirements – DT Programs

- Programs shall be located to promote integration of individuals into their communities. Some examples of integration include locations near public transportation, shopping, restaurants, and recreation.
- Programs shall provide a minimum of five hours of programming per day, excluding transportation time to and from the program, and excluding mealtime unless training during meals is a documented part of the plan.

- Individuals may attend less than 5 hours if required and documented by a physician or the interdisciplinary team.
- Transportation required for individuals shall be the responsibility of the provider.
- Programs shall not be located in buildings where individuals reside.

Section 116.10-Purpose – Medication Administration

The purpose of this Part is to ensure the safety of individuals in programs funded by the Department of Human Services (DHS) by regulating the storage, distribution, and administration of medications in specific settings; training of non-licensed staff in the administration of medications. This applies exclusively to all programs for individuals with a developmental disability in settings of 16 persons or fewer that are funded or licensed by the Department of Human Services and that distributes or administers medications and all intermediate care facilities for the developmentally disabled with 16 beds or fewer that are licensed by the Illinois Department of Public Health.

Rule 350

This Part applies to the operator/licensee of facilities, or distinct parts thereof, that are to be licensed and classified to provide intermediate care for persons with developmental disabilities. The license issued to each operator/licensee designates the number of beds authorized for each level, the date the license was issued and the expiration date. The operator may not admit residents in excess of the licensed capacity of the facility. An intermediate care facility licensed and classified under the Act shall not use in its title or description "Hospital", "Sanitarium", "Sanatorium", "Rehabilitation Center", "Skilled Nursing Facility"

The Illinois Mental Health Code is an Illinois law which establishes the rights of persons who are recipients of services from mental health facilities and developmental disability facilities. Its purpose is to make sure that people who are receiving mental health treatment or developmental disability habilitation services are treated in a humane manner, free from abuse and neglect, with the greatest possible degree of freedom of individual choice.

The basic principle established by the Mental Health Code is that, people with disabilities do not lose any of their legal rights simply because they are a recipient of mental health (MH) treatment or developmental disability (DD) habilitation services. Rights as citizens are guaranteed by the U.S. Constitution and the Illinois Constitution. The Mental Health Code provides that those rights can be limited only to the extent necessary to prevent serious harm to self or others

Rules and Regulations: Where To Find Them

Rule Number	Title	Web Address
50	OIG Investigations of Alleged Abuse or Neglect in State-Operated Facilities and Community Agencies	www.ilga.gov/commission/jcar ✓ click on 'Administrative Code' ✓ click on Title 59 ✓ click on Part 50
115	Standards & Licensure Requirements for Community-Integrated Living Arrangements	www.ilga.gov/commission/jcar ✓ click on 'Administrative Code' ✓ click on Title 59 ✓ click on Part 115
116	Administration of Medication in Community Settings	www.ilga.gov/commission/jcar ✓ click on 'Administrative Code' ✓ click on Title 59 ✓ click on Part 116
119	Minimum Standards for Certification of Developmental Training Programs	www.ilga.gov/commission/jcar ✓ click on 'Administrative Code' ✓ click on Title 59 ✓ click on Part 119
350	Intermediate Care for the Developmentally disabled Facilities Code (ICFDD)	www.ilga.gov/commission/jcar ✓ click on 'Administrative Code' ✓ click on Title 77 ✓ click on Part 350
210 ILCS 30	Health Facilities Abused and Neglected Long Term Care Facility Residents Reporting Act	www.ilga.gov/legislation ✓ click on 'compiled statutes' ✓ REGULATION; Chapter 210; Health Facilities ✓ click on 210 ILCS 30
740 ILCS 110	Mental Health & Developmental Disabilities Confidentiality Act	www.ilga.gov/legislation ✓ click on 'compiled statutes' ✓ RIGHTS & REMEDIES; Chapter 740 Civil Liabilities ✓ click on 110
405 ILCS5	Mental Health & Developmental Disabilities Code	www.ilga.gov/legislation ✓ click on 'compiled statutes' ✓ HEALTH & SAFETY; ✓ Chapter 405 Mental Health; ✓ click on 405 ILCS 5/

Quality Assurance (QA) Programs

Quality Assurance programs can enhance agencies' policies and procedures and rule compliance through:

- periodic reviews of policies to maintain current and best practices
- emphasis on keeping abreast of changes within standards
- addressing each function of your organization through performance measures.

Would you agree that it helps you, your staff and the individuals when surveyors visit your organization and review, monitor and discuss your programs and procedures with you?

Monitoring, Licensing, and Accrediting Bodies

Who Are They and What Do They Expect?

State Mandated Policies and Procedures

When developing, reviewing and revising policies and procedures, consideration must also be given to an agency's monitoring, licensing and accrediting bodies. Here is a chart listing several monitoring, accrediting, and licensing bodies that may come to your organization.

NAMES	MONITORING/ LICENSING	FREQUENCY OF VISIT	LAST VISIT	NEXT VISIT
IDPH Illinois Department of Public Health	Monitoring (ICFsDD)			
CARF Commission on Accreditation of Rehabilitation Facilities	License Accreditation			
HFS Nurses Health Care and Family Services old (DPA)	Monitor Waiver			
DHS Department of Human Services	Monitoring Networks, Bureau of Quality Mgmt., Rates,			
CMS Centers for Medicare/Medicaid Services	Monitor Funding			
Bureau of Accreditation and License Certification (BALC)	License certification			
PAS/ISSA	Link individuals with services; independent advocacy services			
OSG Office of State Guardian	Monitoring			