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Owner:	<i>Allison Smith: Project Manager, PMP</i>
Policy Area:	<i>Strategic Planning</i>
References:	<i>NCQA – Q2 – Element A</i>

Policy Review Guidelines

POLICY

Detroit Wayne Integrated Health Network (DWIHN) shall adopt policies and procedures for the operation as an independent entity.

The Board delegates to the President/Executive Director, or her/his designee, the authority and responsibility to approve and implement operational DWIHN policies; provided, however, (i) the following policies shall require Board approval upon implementation or upon any substantial change: financial and budgetary policies, banking and investment policies, conflict of interest policies, and procurement policies and (ii) prior to the adoption of new policies not requiring Board approval, they shall be made available for Board members' review, comment and, if desired, formal consideration by the Board. Strategic policies and plans are reserved for the Board.

DWIHN provides a formal process for developing, revising and reviewing policies. All policies are reviewed annually, and updated as needed to meet contractual and regulatory requirements.

Only approved policies in PolicyStat are considered active, official policies.

PURPOSE

This document provides guidelines for initiating, preparing and updating DWIHN's policies and procedures; to outline the mechanism for review, approval, authorization, and distribution; and to ensure that policies are developed in collaboration with associated departments.

APPLICATION

1. DWIHN Board, all DWIHN Staff, including Contractual Staff are required to implement and adhere to this policy. Additionally, contracted Network Providers and Sub-Contractors are expected to develop their policies in alignment with DWIHN directives.
2. This policy serves the following populations: Adults, Children, I/DD, SMI, SED, SUD, and Autism
3. This policy impacts all lines of business and populations under the purview of DWIHN.

KEY WORDS

1. DWIHN: The standard acronym to be used in all policies is DWIHN. The first time the acronym is used in your document, the words should be written out with the short form placed in parentheses immediately

after. For example:

Detroit Wayne Integrated Health Network (DWIHN). Thereafter, utilize the acronym.

2. PolicyStat: A cloud-based Policy and Procedure Management Software used by DWIHN to centralize all policies, procedures, and exhibits in order to streamline the policy review process, provide automatic alerts when policies are due for review, ensure cross-departmental collaboration opportunities before policies are finalized, along with a comprehensive audit trail. <https://dwmha.policystat.com/home/>
3. Policy: The overarching idea, guide, regulatory requirement that encompasses how to make decisions that align with DWIHN's mission, philosophy, and program goals. Policies should rarely change. Policies will be approved and signed electronically; some may go the board.
4. Procedure: The actions and daily steps to support and operationalize a policy. A procedure is the sequence of steps for completing a given activity. It may outline the manner in which a particular policy is to be implemented, but it does not take the place of that policy. Procedures may change often, as indicated by any number of factors such as regulatory or contractual changes, staffing, equipment, space, and technology. Procedures will be considered an attachment/exhibit.
5. Stakeholder: Persons and organizations with some interest in improving the mental health of a population. They include person with a mental illness, developmental disability, serious emotional disturbance, and/or substance use disorder, family members, professionals and advocates, policy-makers, founder and other interested parties.
6. Stub Policy: A 'stub-policy' acts as the placeholder for a shared form that is used across several policies. When the attachment/form on the stub policy is revised, all policies with a hyperlink to the 'stub-policy' will see the latest revision without having to separately update the form on each policy.

STANDARDS

1. DWIHN Directors are the policy lead; responsible for the policies in their department. All policies and procedures must be developed using the approved template and follow the development and approval process. There is a template for policies and another for standard operating procedures located within PolicyStat: <https://dwmha.policystat.com/home/>
2. DWIHN-wide policies/procedures are developed to ensure consistency and standardization for significant organizational topics that are interdepartmental or mandated by accreditation agencies or state/federal legislation such as, but not limited to, National Committee for Quality Assurance (NCQA), and External Quality Review (EQR) standards.
3. DWIHN policies are developed to ensure that its business practices, those provided directly and/or delegated to other contracted entities, are in compliance with all current contracts, applicable state and federal laws and regulations.
4. All DWIHN policies, procedures, and policy exhibits are housed on a policy management system. Refer to Exhibit: [Policy and Procedure Development](#).
5. Standardized use of the term " Detroit Wayne Integrated Health Network" shall be referred to by the acronym DWIHN in all policies.
6. The policy lead is responsible for ensuring that contractual and/or clinical criteria are addressed in policy language and that policy development is succinct and appropriate to DWIHN and its delegated entity business needs.
7. The PolicyStat Administrator (PA), or other designee, monitors and tracks policies organization-wide to ensure DWIHN timelines for policy review and updates are met. The PA chairs the Stakeholder Feedback

committee queue. The PA reviews new policies and any existing policy that has significant changes before obtaining Stakeholder input. Applicable DWIHN policies are published for Stakeholder input.

8. Key Words will be defined in a separate document found posted on the DWIHN website under the Library tab <http://dwihn.org/library/policies-procedures-agreements/>
9. DWIHN approved policies and procedures that apply to contracted Network Providers, Persons Served and Stakeholders are considered External policies and posted on the DWIHN website: <http://dwihn.org/library/policies-procedures-agreements/>
10. All DWIHN policies are required to be reviewed annually. This includes all associated Procedures, and Exhibits, including Stub Policies. Updates will be made, as needed, to meet contractual and regulatory requirements.
 - a. Policies are considered the overarching idea, guide, regulatory requirement that encompasses how to make decisions that align with DWIHN's mission, philosophy, and program goals, and the rules by which DWIHN abides. Policies should rarely change.
 - b. Procedures define the actions and daily steps to support and operationalize the policy. A procedure is the sequence of steps for completing a given activity. It may outline the manner in which a particular policy is to be implemented but cannot take the place of that policy. Procedures may change often, as dictated by any number of factors such as staffing, equipment, space, and technology, in addition to regulatory and contractual changes. Procedures will be considered a policy attachment.
11. All applicable policies are to be developed with Stakeholder input garnered through public comment and feedback received.
12. Upon policy approval, the lead or their designee is responsible for presenting and training the network on its content as needed.
13. All policies are developed to ensure the best possible outcomes for the members it serves.

QUALITY ASSURANCE/IMPROVEMENT

DWIHN shall review and monitor contractor adherence to this policy as one element in its network management program, and as one element of the QAPIP Goals and Objectives.

The quality improvement programs of contracted Network Providers, their subcontractors must include measures for both the monitoring of and the continuous improvement of the programs or processes described in this policy.

COMPLIANCE WITH ALL APPLICABLE LAWS

DWIHN staff, contracted Network Providers, and subcontractors are bound by all applicable local, state and federal laws, rules, regulations and policies, all federal waiver requirements, state and county contractual requirements, policies, and administrative directives, as amended.

LEGAL AUTHORITY

DWIHN Bylaws, Article VI - Budget, Financial Controls and Policies

RELATED POLICIES AND PROCEDURES

1. [Procedure: Policy and Procedure Development](#)

RELATED DEPARTMENTS

All DWIHN Departments

CLINICAL POLICY

No

INTERNAL/EXTERNAL POLICY

External

Attachments:

Approval Signatures

Approver

Date

Dana Lasenby: Chief Clinical Officer

11/2019

Approver	Date