

(was MCCMH Policy 1-04-020)

Chapter: **ADMINISTRATION**
Title: **POLICY DEVELOPMENT, IMPLEMENTATION AND REVIEW**

Prior Approval Date: N/A
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Approved by: _____
Executive Director Date

I. Abstract

This policy establishes the process for identification of appropriate policy issues, development of proposals and promulgation of proposed and approved policies, and review and revision, if needed, of Macomb County Community Mental Health (MCCMH) policies and Executive Directives.

II. Application

This policy shall apply to all directly-operated and contract network providers of the MCCMH Board.

III. Policy

It is the policy of the MCCMH Board that:

- A. A Managed Care Organization Manual and an Administrative Manual containing policies for operating standards and procedures be maintained for MCCMH,
- B. All policies proposed for adoption and inclusion in the MCCMH Board Manuals shall be developed and promulgated in accordance with the standards and procedures prescribed below,
- C. All policies contained in the MCCMH Board Manuals, including Executive Directives shall be reviewed on a scheduled basis to determine the need for revision,
- D. All policies shall conform to and comply with the Board Manuals and be approved by the Executive Director, acting as the MCCMH Board’s designee,
- E. Recipient Rights policies shall be approved by the Recipient Rights Advisory Committee and the MCCMH Board, and
- F. The MCCMH Board shall be provided with a quarterly status report on all policy approvals occurring in each quarter, including Managed Care Organization (MCO) and Administrative policies,

- G. All new MCCMH Administrative and MCO policies, revised policies, Executive Directives, and the most current Notice of Implementation shall be maintained on the MCCMH Intranet website.

IV. Definitions

- A. **Policy**
A document containing statements of policy, standards, definitions, procedures, references, exhibits, etc., pertaining to Board services, which is formally adopted.
- B. **Executive Directive**
A document issued by the Executive Director of MCCMH which may contain statements of policy, standards, definitions, procedures, references, exhibits, etc. An Executive Directive may be issued in response to specific problems or issues including but not limited to the health, safety, or welfare of consumers or staff. An Executive Directive may serve as an interim policy with a specific time limit. An Executive Directive remains in effect until or unless it is replaced by a promulgated policy or rescinded by the Executive Director.
- C. **Policy Work Group**
Members of the Policy Management Division (PMD), administrative offices, and representatives from other Divisions pertinent to the policy who may participate in the development of policy language and content, and in the review and development of proposed revisions for previously adopted policies.
- D. **Policy / Legal Compliance Coordinator**
PMD staff member who provides technical assistance and coordination in the development, implementation and oversight of Board policies to ensure consistency of format, language, clarity, and compliance with federal law, statutes, standards, rules and regulations.
- E. **Promulgation**
The formal publication of proposed policies and notification of agencies, staff members, and interested parties of the implementation of approved policies.

V. Standards

- A. Issues proposed for development or revision of policies may be submitted to the Policy Management Division Director or the PMD Policy/Legal Compliance Coordinator by Executive Staff, Division Directors, or any CMH staff member via the supervisory channel, or by any community member, or external agency/entity. Such submissions may include proposed policy, rationale, requirements, standards, language and supportive information.
- B. Policies may be assigned to a Policy Work Group as determined by the PMD, or remain within the PMD, to coordinate the development, review, revision, and/or continuing need, as appropriate.

- C. On a scheduled basis, each policy and Executive Directive, as appropriate, shall be reviewed to determine if revision is required to adapt to changes in federal laws, statutes, regulations, rules, policies, organizational structure, service delivery, or other requirements. Such reviews shall be documented by the PMD Policy/Legal Compliance Coordinator.
- D. Policies proposed for adoption or for reissue in a revised form (for other than technical or presentation changes) shall be presented to the Executive Staff in draft form. Policy draft preparation shall be coordinated by the PMD Policy/Legal Compliance Coordinator.
- E. Policies which contain pertinent excerpts of laws or rules without insertion of Board standards, or which are revised only for technical, format, and presentation reasons, may be presented to the PMD Director and the MCCMH Executive Director for review and approval.
- F. All Board policies and Executive Directives in the Board Manuals shall be cataloged according to the model framework adopted for the Manuals.
- G. Master copies of all policies shall be maintained in the PMD Policy/Legal Compliance Coordinator's office, reflecting all policies currently in effect. Policies removed or replaced by revised material shall be maintained in a file adjacent to currently effective policies.
- H. The Board Manuals shall be maintained in the Policy Management Division. The master copy of the Table of Contents for the Manuals shall be updated as policies are adopted. Notice of additions/revisions/deletions, shall be distributed to all authorized holders of the Manuals, including both directly-operated and contracted providers. Copies of the updated Table of Contents shall be distributed at least annually. Electronic distribution is permitted and encouraged where feasible. One hard copy shall be mailed to each MCCMH contract provider.
- I. The Administrative Manual, MCO Manual, Executive Directives, and the most current Tables of Contents and Notices of Implementation shall be maintained on the MCCMH Intranet website: <http://webserver/policies/> Policies shall be added to the website as they are revised.
- J. Portions of Board policies and Executive Directives found to contradict laws or administrative rules are considered null and void.
- K. All network providers shall maintain internal operating policy manuals (service unit manuals) which include procedures that comply with MCCMH policies.

VI. Procedures

- A. Development of New Policies
 - 1. The PMD Policy/Legal Compliance Coordinator shall review the proposed policy

development and, with appropriate consultation from the pertinent administrative office(s) or Division(s), evaluate the need to address the subject in policy form within the context of existing policies or the development of a new policy.

2. If policy development is needed, the PMD Policy/Legal Compliance Coordinator shall prepare the draft and submit it to the Policy Management Division Director, or designee, for review.

B. Review of Policies

1. The PMD Policy/Legal Compliance Coordinator shall compile and maintain a listing of all Board policies in effect, including information regarding their review status and review dates; review and analyze whether revision is needed, and after consultation with pertinent staff, shall present any revision suggestions to the PMD Director or designee for consideration.

C. Policy Development/Review

The following steps are to be followed for both the development of new policies and the revision of existing policies:

1. Based upon assessment of the need for substantive revisions and the subject matter of the revised or new policy, the PMD Policy/Legal Compliance Coordinator shall determine whether a policy revision or policy development is needed.
2. The PMD Policy/Legal Compliance Coordinator shall review issues, coordinate examination of pertinent laws, regulations, Board policies, etc., and may solicit comments from interested agencies, staff members, and members of the community. The PMD Policy/Legal Compliance Coordinator shall prepare and submit a draft to the PMD Director, or designee, incorporating relevant substantive or technical changes.
3. The PMD Policy/Legal Compliance Coordinator shall make technical changes, if applicable, ensure technical and legal compliance, and incorporate any substantive changes into the draft for review and approval by the PMD Director, or designee.
4. Final drafts of proposed new or revised policies with substantiative changes shall be presented to Executive Staff by the PMD Director or designee. Executive Staff shall review and act on the proposed new or revised policies submitted for consideration with notification of action taken to the PMD Director along with any recommended further action required.
5. If the Policy revision is purely technical in nature, the Policy may be submitted by the Director directly to the Executive Director for approval signature.
6. If the policy requires Board approval, e.g. Recipient Rights policies, the PMD Director shall ensure that the policy is forwarded to the Office of Recipient Rights Director for handling through the Board's committee approval process.

7. The PMD Policy/Legal Compliance Coordinator shall format and prepare the approved new or revised policy for submission to the Executive Director who shall sign the policy document and return it to the PMD Policy/Legal Compliance Coordinator.
8. The PMD Policy/Legal Compliance Coordinator shall implement promulgation, compiling and distributing the new or revised policy and Notice of Implementation to authorized holders of the MCO and/or Administrative Manuals and to other individuals to whom the policy may be pertinent, update Board Manual Table(s) of Contents, and update the master copy of the Manual(s).

D. Promulgation of Policies

1. The PMD Policy/Legal Compliance Coordinator shall
 - a. Electronically place new or revised policies, Executive Directives, and the most current Notice of Implementation on the MCCMH Intranet website, and electronically update the Administrative Manual and MCO Manual Table(s) of Contents accordingly.
 - b. Forward the Notice of Implementation of MCCMH Administrative Policies to authorized Administrative Manual holders by e-mail and direct them to new or revised policies or Executive Directives on the website.
 - c. Use the United States Mail to forward the Notice of Implementation and new or revised policies to the MCCMH contract network providers.
2. The Business Management Division Director shall provide all new MCCMH contract network providers with one hard copy or computer disk of the then existing MCCMH MCO Manual at the time of contract finalization; the PMD shall prepare the MCO Manual or computer disk for this purpose. Subsequent promulgation of new or revised MCO policies shall comply with D.1.c. above.

The MCO Manual or computer disk shall be given to the Administrative or central office of the new contract provider who shall ensure that a copy is made available to any subsidiary office/staff who serves MCCMH consumers under the provider's contract with the Board.

VII. REFERENCES / LEGAL AUTHORITY

None.

VIII. EXHIBITS

None.