

The benefits of online policy and procedure management systems

ABSTRACT

Operational inefficiencies, sub-optimal patient care, financial losses and missing or ineffective sanctions for non-compliance are all potential outcomes that can stem from passive policy and procedure management. Automation can help solve these problems and provide strategic, operational and financial benefits to health care organizations and their professionals.

The implementation and use of an online policy and procedure management system can facilitate and support excellence and sound risk management practices in compliance and accreditation, document management, education and risk management/patient safety.

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INTRODUCTION

User-friendly software applications represent a notable advance over the dysfunctional policy and procedure handling systems and practices common within the health care community, which faces an enormous challenge in developing, managing and distributing policies, procedures and forms. “Inaccessible,” “outdated,” “inconsistent” and “incomplete” are a few of the adjectives health care workers routinely use to describe policies and procedures they face every day.

Policies and procedures also are burdensome, time consuming and complicated to develop, distribute and maintain. Further, internal efforts to measure workers’ compliance with, and comprehension of, policies and procedures are often ad hoc.

Operational inefficiencies, sub-optimal patient care, financial losses and missing or ineffective sanctions for non-compliance are all potential outcomes that can stem from passive policy and procedure management.

This article will explain how the structure of automation, via online policy and procedure management, can solve these problems and provide strategic, operational and financial benefits to health care organizations and their professionals. A sidebar article offers a vendor evaluation checklist.

Operational efficiencies and return on investment

Cascading internal and external influences affect the ability of health care organizations to comply with governmental legislation, changing regulations, accreditation requirements, professional standards and recommended best practices. Policies are utilized as “swords” by plaintiffs, an observation specifically noted by medical malpractice

insurers as the national jury-award median in medical malpractice cases reached \$1 million. (1) The commitment of health care leaders to establish effective means for managing policies and procedures therefore must exist if risks and losses are to be avoided.

Online policy and procedure management systems offer a flexible, practical and cost-efficient means to address enterprise-wide and ongoing responsibilities. Generally, they are designed to operate as an application service provider (ASP) whereby users interact via the Internet with applications and data/document repositories. The foundation of an online policy and procedure management system is to support and protect corporate interests – especially the delivery of safe, efficient and satisfactory patient care.

Specifically, online policy and procedure management is intended to help health care organizations to efficiently and effectively:

- advance patient care/satisfaction;
- develop, modify and/or implement policies, procedures and forms to comply with the Health Insurance Portability and Accountability Act (HIPAA) and regulatory, licensure and accreditation agencies such as the Centers for Medicare & Medicaid Services (CMS) and Joint Commission on Accreditation of Healthcare Organizations (JCAHO), along with decreased resources needed for survey preparation (e.g., consultant fees);
- standardize, coordinate and track the dissemination of policies, procedures and other information/materials;
- eliminate outdated, contradictory or duplicate information that may result in or be a component of litigation;

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- train, educate and test providers, staff and contractors/trading partners, 24/7;
- cut training and education expenses (e.g., food, lecturer/instructor fees);
- improve dissemination of policies, industry news and best practices throughout the organization;
- strategically address current and future operational needs;
- maximize resources and reduce operating costs;
- decrease claim payouts due to failures to follow policies and procedures resulting in patient injury or losses of collectible revenue; and
- identify, locate or even isolate policies consistent with the time of the adverse event.

Policies and procedures: creating a foundation for success

When well written and properly administered, policies and procedures establish the foundation for the successful operation of health care organizations. They provide secure and efficient means for communicating among personnel; focusing on critical actions to assure employee/patient safety and financial solvency; coordinating process responsibilities to prevent adverse events; providing standards for measuring and assessing performance; and identifying barriers to efficient and consistent performance.

Policies, procedures and related documents typically comprise thousands of pages, fragmented into dozens or even hundreds of three-ring binders. Documents range from those covering standard business functions (e.g., recruitment, hiring, billing) to clinical guidelines (e.g., administration of medications, performance of surgical procedures) and required regulatory practices (e.g., HIPAA, corporate compliance). Further, materials often exist in various templates and in a combination of hard copy forms and word-processed documents.

O N L I N E A D V A N T A G E S

The installation and use of an online policy and procedure management system can help health care organizations in a number of areas. Following are some examples, detailed in this article, which may apply to multiple areas.

Accreditation and compliance

- organization of accreditation, legislative and regulatory information, developments and guidelines into a customized reference collection;
- standardization of current operating and clinical documents into a manageable electronic format;
- robust browse-and-search functions with word search capability to quickly identify relevant policies and protocols;
- split-screen viewing to facilitate policy-to-policy and policy-to-standards comparisons, creation and editing;
- administrative tracking, documentation and reporting;
- instant availability of utilization and performance reports;
- expedited development, distribution and implementation of draft, new or revised policies and procedures; and
- on-demand printing of documents, including clinical forms, to expedite release of new versions.

Document management

- systematic conversion of current operating and clinical documents, binders and manuals, forms and other materials into a manageable electronic format;
- notification via targeted e-mail of about-to-expire or expired policies and superseded documents;
- version-tracking and secure archival preservation of documents;
- scalable, multi-user access via Internet; and
- linkage among related documents, policies and reference materials.

Education

- centralization of current operating and clinical documents in a standardized, manageable electronic format;
- availability of application content anytime, anywhere to authorized users; and
- testing and online scoring to monitor staff, contractor and business associate knowledge and performance.

Risk management/patient safety

- support for internal processes and disciplines, including policy circulation, training and review through automation;
- highlighting of individually important policies and procedures through use of a "My Policies" feature;
- distribution of risk management tips easily and in real-time, with minimal expense;
- systematic documentation, analysis and reporting of baseline credentials and educational requirements;
- tracking of practitioner behaviors (policy adherence) in relation to patient outcomes; and
- improved defensibility of claims through easy production of policies and procedures in effect at the time of alleged adverse events.

KEY AREAS OF BENEFITS

Health care organizations are in constant flux responding to changes in fiscal reimbursement, economic downturns, insurance availability, consumer demands and staff quality and availability. More has to be done with significantly fewer resources. With effective and efficient managing documents, health care organizations can enhance overall patient safety, improve organizational effectiveness and protect financial resources.

Health care organizations can realize benefits from the installation and use of an online policy and procedure system, including key and current areas of internal attention and external scrutiny.

Accreditation and compliance

Online policy and procedure management can be a solution for three prominent requirement areas.

Industry accreditation:

For industry accreditation initiatives of JCAHO, Accreditation Association for Ambulatory Health Care (AAAHC), COLA's Laboratory Accreditation program and others, health care entity adopters of online policy and procedure management systems can realize improved onsite survey results. During the review, for instance, a surveyor may request to examine policies and procedures to determine what policies may be past their scheduled revision dates. In the traditional model, the examiner would have to request or physically go to each department and then flip through numerous manuals. With online policy and procedure management, this process is simple and direct. Moreover, an online system prevents the scramble for the correct section of the right manual by allowing policies and procedures to be easily located after a couple of mouse clicks. Personnel, in turn, present themselves as more informed and comfortable (i.e., less stressed) and surveyors may be instantly impressed and satisfied with the accessibility, organization and thoroughness of the organization's practices.

Preparing for scheduled accreditation surveys has historically been resource-intensive and time-consuming, to the point that numerous individuals are often taken offline to ensure an acceptable evaluation. Online policy and procedure management systems, on the other hand, can foster a continuous survey readiness environment promulgated by JCAHO. This serves to create a corporate culture within which best practices are ingrained into daily operations rather than being pronounced only during scheduled surveys. "Collaboration on policies and procedures creates opportunities to determine the best practice for the hospital." (JCAHO L.D.3.4)

Coordination and preparation efforts, overall, can be vastly improved through the utilization of online policy and procedure management systems. This supports the overall intent of the JCAHO standards for "written policies and procedures to standardize practices and describe acceptable methods for carrying out activities while minimizing conflicting practices and understandings."

In addition to improving coordination and preparation efforts, organizations are continuously prepared for both scheduled and unannounced visits by surveyors. The unsuspecting 5 percent of entities accredited by JCAHO that will undergo a random, surprise survey of "variable" and "fixed" performance areas will have unprecedented confidence in how their staff will respond and how they will be evaluated. In 2005, JCAHO priority focus areas are consistent with the National Patient Safety goals, which emphasize patient safety and information management within accreditation programs.

Regulatory/corporate compliance:

The health care community has been encouraged by the Department of Health and Human Services (DHHS) Office of Inspector General (OIG) to promote a higher level of ethical and lawful conduct through the adoption of "voluntary" compliance programs. The nucleus of the OIG's guidance is the development of effective internal controls that promote adherence to applicable federal and state laws along with the program requirements of federal, state and private health plans. One of the key "minimum elements" stated in compliance guidance issued by the OIG is the development and distribution of written policies and procedures that promote the health care organization's commitment to compliance.

Online policy and procedure management applications provide an enterprise-wide, real-time platform to develop, distribute and implement new or revised policies and procedures. These aspects are crucial. For one, corporate compliance programs have matured from a focus on development to that of effectiveness. As a result, health care entities are refining and updating initial policy versions that will need to be re-distributed to all employees and affected business parties. Comprehension testing and tracking of policies received and/or reviewed by employees is also a focus in this advanced stage. Online policy and procedure management systems provide a means by which organizations can track and document the circulation of policies, affirm employees' understanding of written protocols and evaluate the level of individuals' comprehension (through multiple-choice or true-false quizzes) of such materials.

If being a good corporate citizen is not enough initiative for health care entities to have effective systems for monitoring compliance with policies and procedures, consider that the United States recovered more than \$2.1 billion in 2003 under the False Claims Act, a 75 percent increase over FY 2002. In fact, health care fraud accounted for the majority of recoveries in actions instigated by the government as well as whistleblowers, totaling \$1.56 billion.(2) If it could have been demonstrated that proper policies and procedures had been imple-

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mented and followed, then settlements and corporate integrity agreements (CIAs) may be avoided.

CMS initiatives have been aimed at improving the quality of care in all health care settings, calling for a foundation of “collaboration with providers and other stakeholders to ensure that providers aren’t being pulled in conflicting directions” and “the promotion of efficiencies through investment in administrative structures and processes.” Recently introduced Medicare Pay for Performance (P4P) initiatives reward outcomes that can be readily measured and demonstrated utilizing online policy and procedure management. (3)

HIPAA compliance:

The compliance obligation associated with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) is taxing the health care community and business associates. Clear evidence is established in the Winter 2005 U.S. Healthcare Industry Quarterly HIPAA Compliance Survey conducted by the Healthcare Information and Management Systems Society (HIMSS) and Phoenix Health Systems. The survey shows slow progress in implementing the HIPAA Security Rule and Privacy Rule compliance remaining incomplete, despite the fact the Privacy Rule deadline passed in 2003(4). For covered entities to achieve full compliance, organizations and their staff are hurriedly drafting/revising, circulating and enacting clinical and operational changes. Development and implementation of policies and procedures is just one required component; HIPAA also mandates, in part, that:

"a covered entity must train all members of its workforce on the policies and procedures" and "must document that the training as described ... has been provided."

For many organizations, installation of an online policy and procedure management system could mean the difference between compliance and non-compliance with HIPAA's considerable requirements.

Document management

The efficient dissemination of new or updated policies is crucial. Consider the challenges involved in distributing a new or revised policy: Was the policy sent to all appropriate departments? Was it then distributed to, and reviewed by, all relevant staff and contracted personnel? If it included sensitive information, was it protected against unauthorized access? Were manuals/files updated and was superseded material removed and discarded? Were appropriate copies archived for future reference or potential litigation needs? These burdens mushroom for entities that manage or oversee operations at multiple sites, perhaps in more than one city or region.

A benefit of an online system, relative to a paper-based approach, is the identification of duplicate, inconsistent and outdated policies for archiving or elimination. Through searching, sorting and other electronic means, executives and department heads can easily identify these significant operational and liability issues throughout the organization and prevent future occurrences.

Education and training comprehension

Increasingly, health care organizations are being required to document that each employee is periodically reviewing policies and procedures relevant to their position (legislative and regulatory guidance documents, organizational standards, clinical privileges, etc.). This requirement and associated record keeping can be a monumental task, entailing considerable administrative effort and expense. In addition to requiring policy and procedure comprehension by direct employees, health care providers and entities typically require policy adherence by a large number of third-parties, including vendors, physicians and other personnel or firms engaged as independent contractors.

Current staff shortages underscore the necessity to motivate staff in order to attract and retain high quality personnel. Providing online education helps to do this, particularly if demonstration of comprehension and competency is linked with job performance goals and compensation. Furthermore, education can increase employee confidence and reduce opportunities for mistakes to be made. Education and training can also demonstrate sensitivity, commitment and activism by the organization to its staff. Bioterrorism awareness and protocols, for example, can be disseminated easily and globally through an online system, contributing to an overall sense of security within the organization.

Online policy and procedure management systems also solve organizational challenges associated with employee and contractor comprehension testing. Tests can be structured for automatic online scoring, so users receive scores instantaneously. If a user does not achieve a passing score, for instance, the material can be reviewed and the employee can take another test composed of questions randomly drawn for that particular policy. This testing component also serves to identify employees who may be a drain on resources and a risk to patients or other colleagues.

Risk management/patient safety

Examination of adverse events such as amputations of wrong limbs, improper organ transplantations, fatal medical errors and innumerable lesser, but still serious and avoidable, events has exposed repeated breaches in policies and procedures or the absence of needed protocols. Implementation of an effective policy and procedure management system can reduce the potential for error and also serve to directly support a culture of safety.

CONCLUSION

Online policy and procedure management systems, as outlined here, can offer health care organizations many opportunities to advance beyond the status quo in addition to enabling cost and labor efficiencies.

Successful businesses constantly build upon their strengths, correct weaknesses, protect against vulnerabilities and threats and, most importantly, seek out opportunities for improvement in compliance and accreditation, document management, education and risk management/patient safety practices. For forward-thinking health care organizations, the implementation and use of an online policy and procedure management system can be one such opportunity.

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ONLINE POLICY AND PROCEDURE MANAGEMENT SYSTEMS VENDOR EVALUATION CHECKLIST

The system should:

- Be Internet-based and specifically tailored for health care organizations.
- Be accessible to all employees, departments and locations in an online/real-time mode.
- Utilize Microsoft Word.
- Allow for full text upload and downloads.
- Parse and tag documents individually.
- Extensively utilize structured data fields, separating and distinguishing all metadata elements of individual policies/procedures.
- Assign documents to specific users and specific groups of users.
- Create and manage online tests, measuring and reporting content comprehension of users.
- Provide scoring and electronic signature/acknowledgement of policy/procedure review.
- Archive historical policies and test data to authorized administrators.
- Contain a core set of easy to use management reports.
- Automatically identify duplicate, obsolete and contradictory policies.
- Automatically link and provide side-by-side viewing of related documents and policies.
- Provide external Internet access to reference sites.
- Print in both HTML and Microsoft Word template formats.
- Provide online editing, approval and distribution of policies and procedures.

The vendor's services should:

- Convert all policies and procedures, regardless if electronic or hard copy paper documents, to a standardized electronic format.
- Provide on-site:
 - ___ Project management
 - ___ Service
 - ___ Training
 - ___ Technical support
- Have several years of operating history.
- Currently serve at least one client with a number of employees/users similar to your organization's size.