Creating Effective Policies and Procedures

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Disclosure of Conflicts of Interest

- Susan J Taylor, MT(ASCP), MS, CIC, FAPIC

- Has no conflicts of interest

Objectives

- Highlight the differences between a policy and procedure

- Describe the steps to developing an effective policy and procedure

Group Survey

Would everyone who enjoys creating policies and procedures please raise your hand?

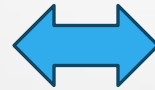# Does creating policies or procedures feel like climbing up a mountain?

Do policies/procedures pile up like mountains in the distance?

Difference in Policies and Procedures?

Policy

Facilities official stance on how to handle an issue
Made up of rules
More focus on what not to do
Scope is usually facility wide

Procedure

Based on best practice
Made up of steps
Main focus is on what should be done
Can be limited to a specific task or activity

Both Can Be Guidelines

Basic Building Blocks for Policies and Procedures

Creating

Implementing

Monitoring

Maintaining

Before You Start:

- Identify the group of people who will read and attempt to comply with your policy. Remember to write for them!

- Review the literature and look for evidence of best practice

- Be sure to follow your facility or system format for policies and procedures

Getting Started

- Realize that you will be revising

- Outline it first and fill in the details later

- Do a Brain dump – write down everything you know about a process and then organize later

- Interview a department expert on the process and make notes on what they say

- Research the process with CDC, APIC, AORN, or other appropriate sources

- Network with other IP's in your system or APIC chapter

Writing Tips

- Use plain language
- Write in the third person (e.g. the employee, the manager, the department
- Use active voice not passive voice
- When you use an acronym the first time, write out the whole name.
- Clearly identify responsibilities, timeframes, and decision-making authority
- Make it last – use position titles not actual names

Policy Examples: Food Employee Policy

A

A Food Employee with an illness will stay home from work until well

B

A Food Employee will report these symptoms to their supervisor before coming to work:

- Diarrhea
- Vomiting
- Jaundice (yellowing of eyes)
- Sore throat
- Fever
- Wounds

Additional Writing Tips

- Provide links to referenced documents or webpages

- Choose command words carefully – Must, Will, Should

- Avoid shall because of its commanding and legalistic tone.

- Consider using tables, charts, and decision trees to make difficult material easier to understand.

Little by Little Roots Form

Characteristics of Effective Policies and Procedures

- Action oriented.

- Relevant.

- Concise.

- Unambiguous/well understood.

- Timely and current.

- Helpful in solving problems.

Structure of Policies and Procedures

Section for Identification and Tracking

Section that explains the policy

Section that explains the procedure

Elements related to other documents

Section for Identification and Tracking

Cleaning and Disinfection for Patient Care Equipment		
Policy and Procedure Type: Infection Prevention	Date Issued: June 2023	
	Supersedes: May 2023	
Department: Infection Prevention	Policy Number: IC 1230	
Reviewed by: Infection Prevention Committee	Review Date: June 2023	

Reference: APIC Forms and Checklist   Volume 2

Section That Explains the Policy

- Purpose:

  - To minimize the risk of transmitting infections, between patients or employees, via contact with equipment that may be contaminated.

- Policy:

  - Non-critical patient care equipment (touch intact skin) must receive low-level disinfection with a hospital grade disinfectant before use on each patient. Surfaces must be pre-cleaned when visibly soiled before being disinfected. Low level disinfection is performed following the manufacturer's instruction for use (IFU) using either bleach germicidal disposable wipes (4 minute wet time), the (Specify) germicidal disposable wipe (2 minute wet time) or a hospital grade disinfection product such as (Specify) (10 minute wet time).

Section that Explains the Procedure

- Procedure: Cleaning shared patient equipment in In-Patient Areas
  - The following grid outlines the procedure to be utilized for cleaning some of the most commonly used patient care equipment
- **Shared Equipment All In-Patient Units**

Equipment	User	Timing	Product	Other
IV Poles	EVS/SPD	Daily and Discharge room cleaning	Brand Allow 2 minutes contact time	

Procedure Continued

Equipment	User	Timing	Product	Other
Glucose Monitor	Nursing	Before each use on each patient	Brand wet time 2 minutes	See specific procedure
Wheelchairs	Nursing/PT/OT	Before use on each patient	Brand wet time 2 minutes	

Specific Procedures for Equipment

- Must include manufacturer's instructions for use (IFU)

- Example: **Glucometer Cleaning Instructions**

  - Cleaning/Disinfecting Equipment

  - Perform hand hygiene before handling the meter, then don gloves.

  - Use (specify) Germicidal Disposable Wipes to wipe down Glucometer.

  - Allow 2 minute wet time.

  - Do not allow cleaning solution to run into the meter through area around the buttons or the meter's test strip or data ports.

  - Add picture of cleaning wipe container and glucometer

  - Reference: Specify Company IFU

Section for References and Attachments

- Attachments
  - Graphs, tables, flow charts, decision trees
- References
  - CDC guidelines
  - Evidence based research
  - APIC
  - Manufacturer IFU
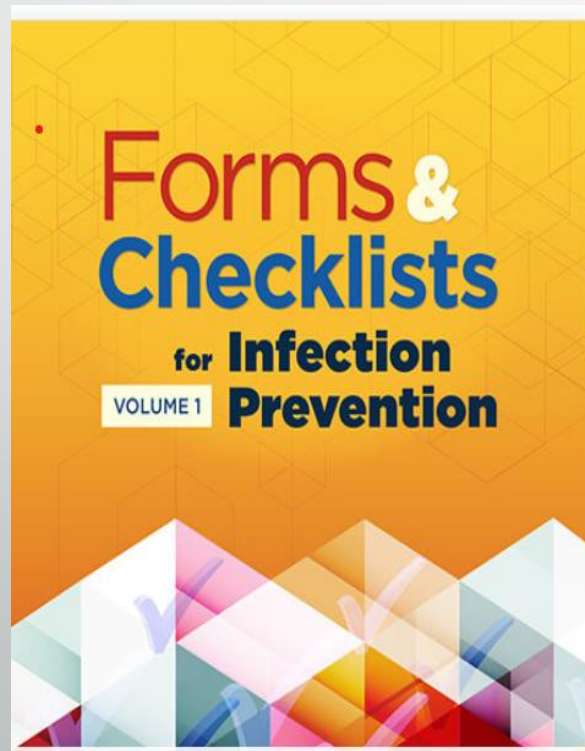
Examples of Attachments

- Nurse driven protocols
  - Foley removal
  - External Catheter
  - C difficile test orders
  - Placing a patient in Isolation

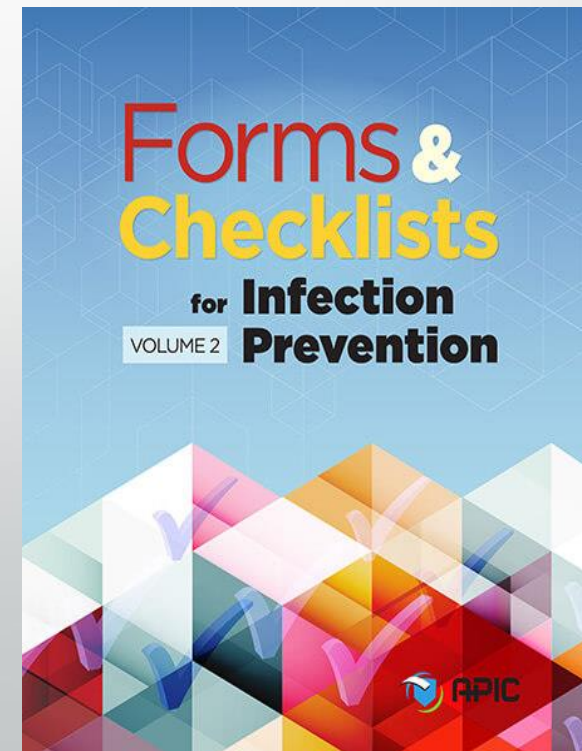| Infections that require precautions	
Organisms/Ilness:	How long to remain in Precautions?
Droplet	

APIC Reference Help

Volume 1

Volume 2

Steps for Effective Policies and Procedures

- Define the purpose
- Use a template for writing
- Prepare to implement the policy
- Get feedback
- Refine and improve the policy
- Implement and monitor use

Be like Old Faithful!

Implementing Policies and Procedures

Features of effective implementation

Leaderships and governance

- Allocate a senior lead with authority
- Secure the expertise needed
- Unite implementing actors
- Agree on roles and responsibility
- Establish project governance arrangements

Planning and project management

- Map how, what, when, where, for whom
- Monitor resources and timelines
- Employ project management tools
- Consider technology needs early
- Design monitoring approaches

Communication and engagement

- Plan and deliver
- Determine stakeholders
- Engage meaningfully and regularly
- Consider the bigger audience
- Consider the internal audience

Organizing Effective Implementation

- Obtain the support of senior leadership and a physician champion if possible

- Build a team with the expertise needed – Computer order set, nurse with specialty?

- Establish a timeline for implementation - limited area or facility wide?

- Identify resources needed – any new technology or products?

- How will communication be accomplished?

- How will monitoring and evaluation take place?
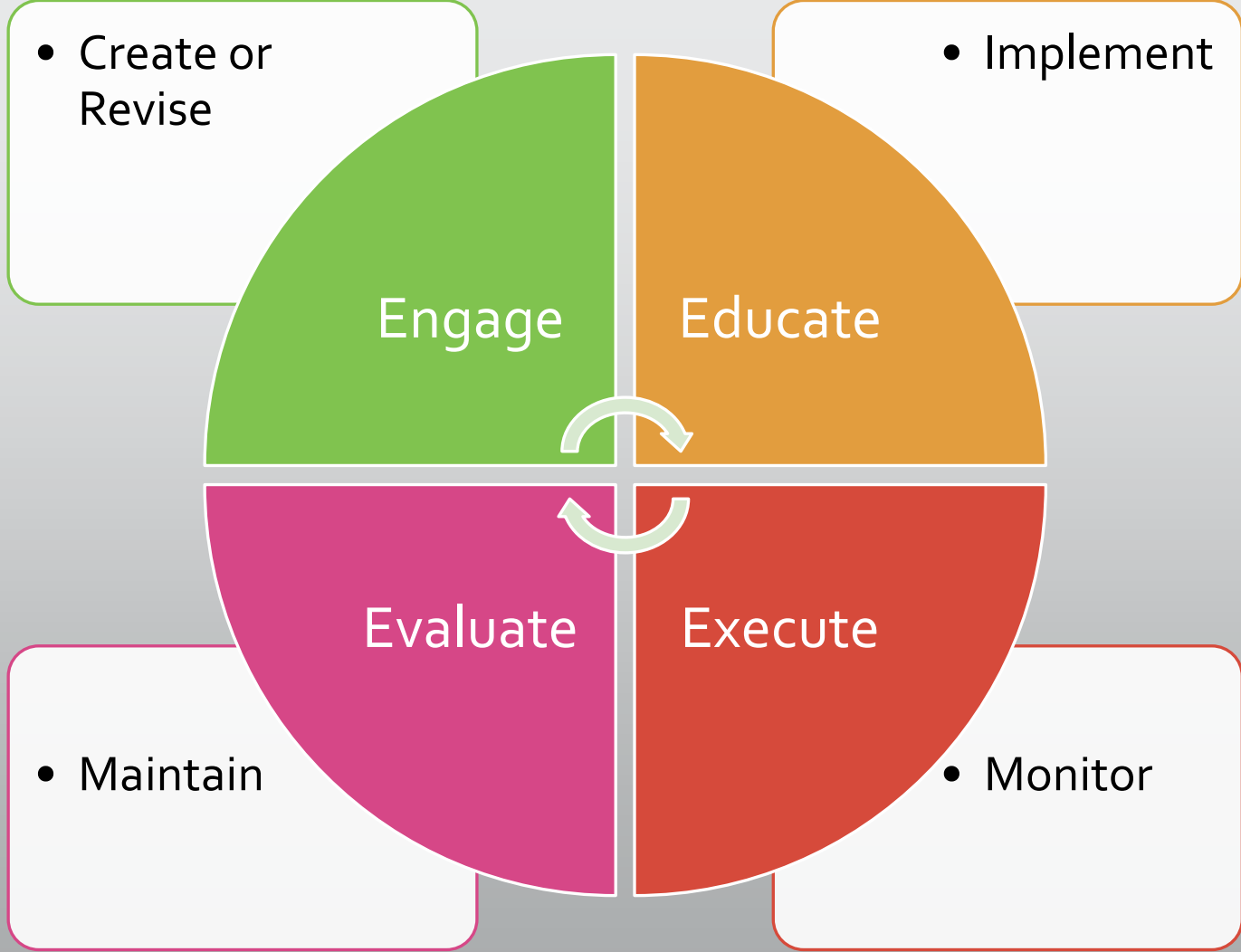
Monitoring the Process

- **Rounds - Do the users have the tools needed?**
  - Instructions available
  - Can the user tell you how
  - Computer order set
  - Product

Evaluating the Process

- Decide during implementation what will be measured

    - Decrease in Infection rate

    - Increase use in product

    - Decrease use of invasive devises that increase the risk of infection

    - Improved patient satisfaction score

Regulatory Requirements

- OSHA
  - Bloodborne pathogen and TB policies are reviewed annually
- Comply with CMS and state regulations
- DNV develop relevant policies and procedures based on risk assessment
- The Joint Commission defers to CMS on 3-year review of all policies
  - Review JC standards annually that pertain to policies and procedures
  - 2024 changes

New JC Standards Effective July 1, 2024

- For Hospitals and Critical Access Hospitals only
- Requirement for Infection Control Policies and Procedures
  - IC.04.01.01, EP (Element of Performance) 3,4
- The Hospital's Infection Prevention policies and procedures are in accordance to applicable law and regulation
  - CMS, FDA, OSHA, State and Local public health
  - Manufacturers IFU
  - CDC guidelines

Details Matter

- Pay attention to details in regulatory requirements

- Does the facility policy conflict with corporate policies?

- Does the policy conflict with State or Local regulations?

  - Systems in more than one state

References

- Hateley-Browne, J., et al., [Implementation in Action: A Guide to Implementation Evidence-informed Programs and Practices](), 2019.

- APIC Forms and Checklist Volume 2
  - APIC.org/resources/store

- The Joint Commission New Infection Control Standards
  - https://www.jointcommission.org/standards/prepublication-standards/new-and-revised-requirements-for-the-infection-prevention-and-control-chapter/

- Anderson's original framework for the policy process

- https://compliance.byu.edu/tips-for-writing-policies-and-procedures

Questions?