

Virginia Adult Day Center Model Infection Control and Prevention Policies Grant

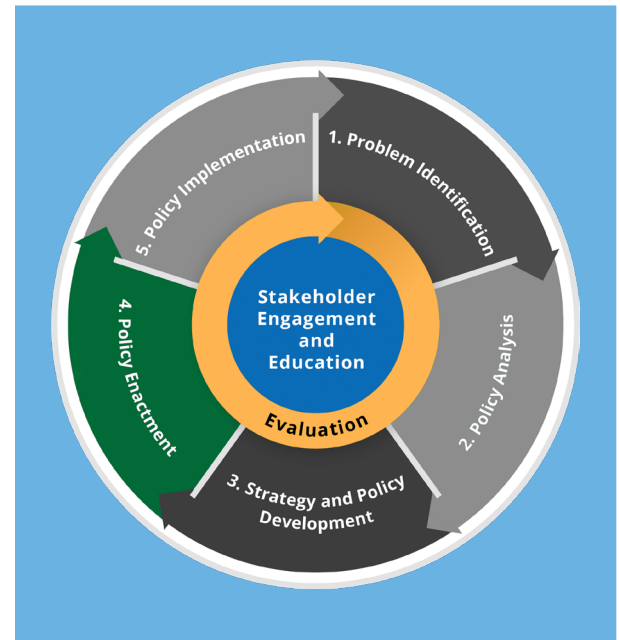
Policy Enactment Tip Sheet

What is Policy Enactment?

Policy enactment is getting official permission to implement a policy by following an adult day center's (ADC) approval process.

Why is Policy Enactment Important?

Authorization for use of the policy grants the center the approval to conduct operations in the manner written or described by the policy. Policy enactment further provides demonstrated support to uphold the purpose of the policy by leadership and staff alike. Without this authorization or permission, a center could change practice without the appropriate buy in, causing disruption in workflow, misunderstanding among levels of staff, or possible citations during site assessments by regulating bodies.



Who Should be Involved in Policy Enactment?

Those involved should be members of a center's team who have analyzed the policies needed, who develop and update those policies, who will put the policies into action, and who will enforce the policies. Key stakeholders should also be included in policy enactment. These are individuals who are supportive of a center's mission, and/or have a vested interest in the success of the center, including:

- 1 Government agencies/regulatory entities who design and issue regulations and standards
- 2 Trade associations who support centers through advocacy, education, and networking
- 3 Board members and executive leaders who provide strategic planning and oversight
- 4 Management team who leads the operations of the center as well as oversees daily operations, including policy implementation
- 5 Risk managers, quality improvement leaders, or legal representatives, to ensure the policies enacted do not conflict with laws or regulations

How are Policies Enacted?

The policy enactment process is not always straightforward and may be complex and nuanced. The process and procedures for enacting a policy should be documented and consistently followed to receive official approval for implementation.

To Do:

Review the regulation the policy attempts to address, ensuring it does not conflict with the regulation. Have a regulatory expert review the document, if possible.

Send draft to staff and identified stakeholders, including the Board if applicable, for review. Provide ample turnaround time.

Obtain final approval from management as this person(s) is ultimately accountable for ensuring adherence to policy.

Reminders

- Follow your center's process for policy enactment to obtain needed approval
 - Use this tip sheet for steps to follow if your center does not already have a process, allowing for staff feedback
- Include stakeholders in the process who are both supportive of the policy as well as those who may voice concerns or counterpoints for consideration
- Policy enactment can be a slow process that may require several attempts, resulting in repetition
- Policy enactment is complete when the policy has been authorized for use
 - Include documentation (date, committee approved by) that the policy has been approved or authorized

Tips to Improve Policy Enactment

- Make sure your policies and procedures are well-formulated, starting with a critical review, and ensure policies align across regulatory bodies
- Gather feedback from several sources to prevent possible surprises
- Plan for compliance and roll out
- Plan for any actions/processes within the policies that will affect budget and plan accordingly
- Communicate with purpose
- Retain documentation of staff education regarding the policy
- Test for complete understanding
- Evaluate for success and areas of improvement
- Review policies annually and update as needed

Benefits

- Addresses problems and issues by creating a framework/structure for action and continual improvement
- Creates a more stable environment for center operations and staff by providing clear guidelines and expectations
- Ensures compliance with regulatory standards
- Helps avoid errors by anticipating problems and mitigating risks
- Provides a structure for working through an incident or problem
- Promotes equity, consistency and uniformity

Challenges and Solutions

Challenge	Solution
Lack of coordination among team members and/or management	Plan meetings to strategize both before the policies are written and during annual revisions (or more often) to ensure all members of the team are well-coordinated
Poor communication, lack of resources, inadequate staffing	<ul style="list-style-type: none"> • Regularly schedule routine staff meetings to review policies (“policy of the month” education program for staff) • Allocate appropriate funding and budgetary line items to meet the needs of the program • Ensure contingency plans are in place for coverage of policy responsibilities when staffing crunches occur
Inaccurate, untimely, irrelevant information leading to the creation of a policy	<ul style="list-style-type: none"> • Meet with staff who will be impacted by the policies, or are responsible for implementing the policies, so they can share their opinions, thoughts, and information about the processes • Complete a “fact check” of what is shared during meetings by asking attendees to help verify the information
Failure to anticipate problems	Vet policies by instructing staff to enact them for a set period, ensuring problems are identified and solutions are found before the policy is fully implemented
Failure to achieve objectives	Complete staff competency testing to ensure adherence to the correct procedures, evaluate the outcomes of the policy, and implement a routine policy revision process
Unanticipated costs	Set, and operate within, the project’s budget, implementing phased roll-outs to ensure costs remain as expected
Pushback from staff	<ul style="list-style-type: none"> • Include staff in the policy development process where applicable, ensuring they can share concerns before a policy change • Ensure staff have the needed education and training on the policies, both upon hire and ongoing • Make policies accessible by storing them in a centralized area • Communicate with discouraged staff to hear their concerns and welcome their assistance with solutions