

**Community Mental Health Affiliation
of Mid-Michigan**

PROCEDURE: 1.3	Page 1 of 3	SUBJECT: Policy and Procedure Development and Review
Related Policy: 1.0		SUBJECT: Administration of PIHP
Issuing Director: Director of Affiliation Operations		Original Effective Date: 02-17-06

REVISED DATE

03-04-08
05/19/09

Review Date(s)

2-16-07					

I. PURPOSE:

To provide standards for the development, review and maintenance of CMHAMM policies and procedures.

II. STANDARDS:

All CMHAMM Policy and Procedure Development will occur via the authority of the Director of Affiliation Operations, **as designated by the PIHP Executive Director**, with input from CMHAMM Affiliation Committees, councils and/or workgroup(s) responsible for review of the area of Affiliation activities addressed in the policy and/or procedure. All CMHAMM policies require CEI-PIHP Board approval. All Policies and Procedures will be reviewed annually.

III. PROCEDURES:

A. New Policies:

1. The proposed policy is developed by the PIHP with **direction and input from the Director of Affiliation Operations. The appropriate input from the Affiliate Work Group(s) will also be consulted regarding the development of Affiliation Policies.** The draft content, **when completed**, will be sent to the Affiliation Compliance Administrator **for review.**
2. The Affiliation Compliance Administrator will put draft content into the Affiliation Policy format and assign a number and will then forward the draft policy to the Director of Affiliation Operations.
3. **The Director of Affiliation Operations has the authority to accept or reject the workgroups proposed policy. The Director of Affiliation Operations must accept the policy prior to taking the policy to the Affiliation workgroups for feedback and prior to recommending formal approval of the policy to the PIHP Board. If the Director of Affiliation Operations does not accept the content of the policy as written, the Affiliation Compliance Administrator will request further information/edits to the policy from the appropriate PIHP Staff/ Affiliation Workgroup(s). This will continue until the Director of Affiliation Operations accepts the policy as written for recommendation to the PIHP Board for approval.**
4. **The decision of the DAO can be appealed by PIHP staff only if they are serving as the content expert for the policy area in question (ie: Finance can only appeal Finance content area, etc.) and are acting as PIHP staff with an objection that is based on the best interest of the PIHP and CMHAMM and not on the behalf of any individual Affiliate.**

- Any individual staff or designee representative that participates in a workgroup meeting that develops an Affiliation Policy cannot, at a later point in time, challenge the recommendation that was agreed upon by the workgroup that developed the policy.
5. The Affiliation Compliance Committee will review proposed policy, recommend modifications and provide advice to the Director of Affiliation Operations.
 6. The PIHP Leadership Senior Management Group and the Affiliation Steering Committee will review proposed policy, recommend modifications and provide advice to the Director of Affiliation Operations. The Senior Management Group and the Affiliation Steering Committee are advisory to the DAO and do not approve/disapprove CMHAMM policy or determine recommendations to the PIHP Board for approval.
 7. The Affiliation consumer and Stakeholder Advisory Council will review proposed policy, recommend modifications and provide advice to the Director of Affiliation Operations.
 8. The Director of Affiliation operations will present the policy to the PIHP Board of Directors and will secure approval prior to implementation. Only the Director of Affiliation Operations, or designee, will present Affiliation Policies to the PIHP Board of Directors for approval.
 9. The Director of Affiliation Operations will complete a CMHAMM Bulletin when the Board has approved the policy. The CMHAMM Bulletin will be sent to the Affiliation Compliance Administrator. ~~sends an electronic version of the Board approved policy to the Affiliation Compliance Administrator.~~
 10. The Affiliation Compliance Administrator will send the CMHAMM Bulletin, with the new policy attached, to the ~~notify the Affiliation Secretary that the new procedure is ready to~~ post to the CMHAMM website.
 11. The Affiliation Secretary will place the policy and Bulletin on the CMHAMM web site and notify the Affiliates via e-mail of the new policy and Bulletin.

B. New Procedures

1. All procedures originate from an existing CMHAMM policy.
2. A proposed procedure is developed by an Affiliation Work Group or the PIHP, with direction and input from the Director of Affiliation Operations, ~~input from the appropriate Affiliation Work Group(s), the Director of Affiliation Operations and the Affiliation Compliance Administrator.~~
3. The draft content, when completed, will be sent to the Affiliation Compliance Administrator for review. The Affiliation Compliance Administrator will put draft content into procedure format, assign the procedure number and send the draft procedure to the Director of Affiliation Operations for acceptance.
4. The Director of Affiliation Operations has the authority to accept or reject the workgroups proposed procedure. If the Director of Affiliation Operations does not accept the content of the procedure as written, the Affiliation Compliance Administrator will request further information/edits to the procedure from the appropriate PIHP Staff/ Affiliation Workgroup. This will continue until the Director of Affiliation Operations accepts the procedure as written.
5. The decision of the DAO can be appealed by PIHP staff only if they are serving as the content expert for the procedure area in question (ie: Finance can only appeal Finance content area, etc.) and are acting as PIHP staff with an objection that is based on the best interest of the PIHP and CMHAMM and not on the behalf of any individual Affiliate. Any individual staff or designee representative that participates in a workgroup meeting that develops an Affiliation Procedure cannot, at a later point in time, challenge the recommendation that was agreed upon by the workgroup that developed the procedure.
6. The Affiliation Compliance Committee will review proposed procedure, recommend modifications and provide advice to the Director of Affiliation Operations.
7. The PIHP Leadership Senior Management Group and the Affiliation Steering Committee will review the proposed procedure, recommend modifications and provide advice to the Director of Affiliation Operations. The Senior Management Group and the Affiliation

Steering Committee are advisory to the DAO and do not approve/disapprove CMHAMM procedures.

8. The Affiliation Consumer and Stakeholder Advisory Council will review the proposed procedure, recommend modifications and provide advice to the Director of Affiliation Operations.
9. Director of Affiliation Operations, ~~approves the procedure and~~ as appropriate, presents the approved procedure to the PIHP Board of Directors for informational purposes only.
10. The Director of Affiliation Operations ~~will complete a CMHAMM Bulletin and send to the Affiliation Compliance Administrator. send an electronic version of the approved CMHAMM procedure to the Affiliation Compliance Administrator.~~
11. The Affiliation Compliance Administrator will ~~send the CMHAMM Bulletin, with the new procedure attached, to the~~ notify the Affiliation Secretary ~~that the new procedure is ready to post to the CMHAMM website.~~
12. The Affiliation Secretary will place the procedure ~~and the Bulletin~~ on the CMHAMM website and will notify Affiliation Staff of the new procedure ~~and Bulletin via email.~~

C. Review/Revisions of Policies & Procedures

1. Annually, within 30 days prior to the required review date, the Affiliation Compliance Administrator will send out notification to the Director of Affiliation Operations and the responsible PIHP Director/Staff that policy/procedure reviews are due.
2. The responsible PIHP Director/Staff ~~and the Director of Affiliation Operations~~ reviews, makes changes if applicable, and confirms current policy and/or procedure.
3. For reviews which results in no change or non-substantive changes.
 - a. ~~Director of Affiliation Operations~~ **The PIHP Staff** sends review date and non-substantial changes to Affiliation Compliance Administrator.
 - b. The Affiliation Compliance Administrator will make the non-substantive changes to the policy and/or procedure ~~and inform the Director of Affiliation Operations.~~
 - c. The Affiliation Compliance Administrator notifies the Affiliation Secretary that the revised/reviewed policy/procedure is ready to post to the web site.
 - d. The Affiliation Secretary will place the policy/procedure on the CMHAMM website and notify Affiliation Staff of the posting.
4. For reviews which result in substantive changes.
 - a. **The PIHP Staff will send the substantive changes to the Affiliation Compliance Administrator.**
 - b. **The Affiliation Compliance Administrator will inform the Director of Affiliation Operations of the changes in policy/procedure for approval. If the Director of Affiliation Operations does not approve the changes as written, the Affiliation Compliance Administrator will request further information/edits to the policy/procedure from the appropriate PIHP Staff. This will continue until the Director of Affiliation Operations approves the policy/procedure.**
 - c. **When accepted, the Director of Affiliation Operations will** bring substantive changes to appropriate CMHAMM Work Group or committee for review, modifications, and advice. Substantive changes in policy will be approved by the PIHP board of directors. ~~Substantive changes in procedures will be approved by the Director of Affiliation Operations.~~
 - d. **The Director of Affiliation Operations will complete a CMHAMM Bulletin when the policy/ procedure has been approved. The CMHAMM Bulletin will be sent to the Affiliation Compliance Administrator.** ~~sends electronic version of revised and approved documents, via email, to the Affiliation Compliance Administrator.~~
 - e. The Affiliation Compliance Administrator will enter the review and revised dates on the Policy/Procedure.
 - f. The Affiliation Compliance Administrator **will send the CMHAMM Bulletin, with the revised policy/procedure attached, to the** notifies the Affiliation Secretary ~~that the revised/reviewed policy/procedure is ready to post to the web site.~~

- g. The Affiliation Secretary will place the policy/procedure **and the Bulletin** on the CMHAMM website and notify Affiliation Staff of the posting **and Bulletin via email**.

D. Maintenance:

The Affiliation Compliance Administrator will be responsible for informing the Director of Affiliation Operations and the responsible PIHP Director/Staff that reviews of current CHAMM policies and procedures are needed in order to maintain a current policy and procedure system.

E. Appearance & Numbering

1. Appearance:
Policies and procedures will be formatted with Arial 10 font and shall have 1” margins. Subsequent pages shall have a header format that identifies the policy/procedure by number and title and page number.
2. Numbering:
 - a. Policies
All new CMHA-CEI policies will be assigned a number by the CMHAMM Compliance Administrator.
 - b. Procedures
All new CMHA-CEI procedures will be assigned a number by the CMHAMM Compliance Administrator.
3. Current versions of the CMHAMM Policy and Procedure Templates will be kept on the **Affiliation Website under the Policy and Procedures Section**. ~~PIHP Information Systems J-Drive, in the forms folder.~~

IV. APPLICATION:

This procedure applies to all CMHAMM CMHSPs.

V. MONITOR AND REVIEW:

Adherence to this procedure is monitored by the Affiliation Compliance Administrator, with input from the Affiliation Compliance Committee and PIHP ~~Leadership~~ **Senior Management Group**. This procedure is reviewed annually by the Director of Affiliation Operations. This procedure is monitored by accrediting bodies and regulatory agencies as applicable.

VI. RELATED POLICIES AND PROCEDURES:

CMHAMM Policy 1.0 Administration of PIHP