

Creating Policy & Procedure Manuals

The organization and content of a physical therapy policy and procedure manual vary according to the organization's needs.

Getting Started

Begin by determining the general organization of the manual and its primary content areas. Develop a list of topics for each section. Brainstorm, consult with colleagues, review manuals from similar organizations, do Internet research, and review relevant management resources. From those lists, develop your table of contents.

Begin with a description of your practice or clinical environment. If they have been developed, include the organization's mission and vision statements and core values. An organizational chart of the practice gives the reader clear information on how decisions are made within the organization. Inclusion of APTA's Code of Ethics for the Physical Therapist, Standards of Ethical Conduct for the Physical Therapist Assistant, and Standards of Practice confirms the high standards the clinic sets for itself.

The size of the practice, the complexity of the parent organization (if applicable), and the number of different services offered will help determine the manual's organization and content. If the practice is subject to accreditation requirements by an external organization such as the Joint Commission, you may want to consult those manuals to title the various sections of your own. This will improve efficiencies by aligning your policies with accreditation standards.

Most policy and procedure manuals are organized into three or more major sections. A typical physical therapy policy and procedure manual includes sections on:

- Human resources,
- Scope of services,
- Facility operations,
- Safety, infection control, and emergency preparedness, and
- Patient care/best practice guidelines.

Next, determine a standardized format for documents within the manual. Include the title and number, the effective date, dates of any revisions, the intended audience, and the contact person responsible for interpreting and enforcing the policy. Templates can be helpful in providing a consistent format, as long as they meet your organization's needs.

Convert existing policies and procedures into the adopted format. Take the time to update existing content when necessary. Develop new content as determined by your table of contents. Research each area carefully and make sure your new documents are accurate and

comprehensive. Use consultants and obtain approvals as needed. Include copies of regulations and externally developed procedures (example: hand-washing guidelines) to encourage compliance. By taking the time necessary to get these documents right, you will prevent problems down the road.

Consider including a disclaimer at the beginning, stating that the manual is provided for informational and compliance purposes and does not constitute a legal contract. Such a statement can help protect management in the event of a dispute or misunderstanding. Your legal counsel can develop language for a disclaimer for your particular practice setting.

Review Process

Once the manual is completed, have several individuals within your organization review it for clarity. If your practice is small, you might ask colleagues from other organizations or even friends and family to take a look. Choose individuals with different roles and length of service within your organization, and with different educational and ethnic backgrounds, if possible.

Consider how policies and procedures interrelate, to ensure consistency in language, terminology, references, and format. Read the document in its entirety to check for inconsistencies and outdated material.

The manual should be reviewed by legal counsel, and by other individuals as dictated by organizational chain of command. Review by legal counsel is necessary to ensure that policies and procedures are consistent with state and federal laws governing employment practices, patient privacy, hazardous waste management, incident reporting, and other critical areas. Sound legal advice at this point in the process is the best insurance for preventing problems. Don't try to save money on the front end-it could cost you exponentially in the future.

As a final step, obtain approval for the completed manual from appropriate individuals within the organization.

Implementation

Make certain everyone in the organization understands and agrees to all relevant components of the policies and procedures. This is especially true for new employees, as the manual becomes the primary tool for orientation and training. Experienced employees should review the manual at regular intervals (at least annually), whenever there is any change in policy or procedure, and whenever a question arises. Each employee should sign a statement of understanding and agreement to the policies and procedures at his or her hiring, annually, and when significant changes are made.

If possible, make changes annually, because constant updates can create confusion for staff. When significant changes must be made, provide orientation and training on the new content and have all relevant employees acknowledge in writing their understanding and acceptance of the

changes. Make certain that all hard and electronic copies are updated, and that all outdated materials are removed and discarded.

Elements of Policy & Procedure Manuals

Definitions

The organization and content of a physical therapy policy and procedure manual vary according to the organization's needs. There is, however, standard content that should be included in manuals in most physical therapy settings. To start with, here are some definitions from businessdictionary.com.

Policies are principles, rules, and guidelines formulated or adopted by an organization to reach its long-term goals. They are designed to influence and guide major decisions, actions, and activities.

Procedures are the methods used to put policies into action in day-to-day operations.

Together, **policies and procedures** seek to ensure outcomes compatible with an organization's point of view.

Characteristics

A good, well-written policy and procedure manual should be:

Clear, concise, and easy to read. Use simple language that is free of jargon, acronyms, and undefined terms. Remember that the manual is intended for all employees-professional, technical, clerical, and administrative. Make generous use of white space for ease of reading.

Accurate. Research current federal and state employment laws, human resources requirements, accreditation requirements, practice standards, and health and safety regulations. A wise investment is using legal counsel and other consultants to ensure accuracy and compliance.

Comprehensive. A comprehensive manual can prevent confusion, inconsistencies, and disputes-especially in situations related to employment. For example, a clear cancellation and no-show policy can make life easier for front desk personnel and help prevent misunderstandings and unhappy patients. A carefully developed dress code policy can clarify the organization's position on such issues as tattoos, piercings, and fragrances, and can eliminate the need for uncomfortable conversations that tend to result when expectations aren't clear.

Enforceable and consistent. While the manual should be as clear and detailed as possible, you also must consider how you will enforce the specific rules and expectations, and what the consequences should be for not complying with policies and procedures. Policies should be applied and enforced consistently across the organization. Failure to do so could cause morale issues, confusion, and potential legal harm in the form of a lawsuit. You must balance the needs for both flexibility and clarity. Ideally, policies will have a long shelf-life and will not need to be continuously edited when minor procedures are changed.

Policy and Procedure Manuals in Physical Therapy Settings

Sample Policy and Procedure Template

Format and organization of policy and procedure manuals will vary based upon the needs of the facility. This template is provided as a general framework and is not intended as a recommendation for all settings.

Policy/Procedure Title

Document #:

Effective date:

Page number(s):

Approved by:

Purpose

A general statement as to the purpose of this policy/procedure

Background

Information may include specific legislation or regulations that the policy or procedure is intended to address.

Definitions

Terms and acronyms that are not widely understood

Policy

Specific rules and guidelines that apply to this policy/procedure

Procedure

Descriptions of processes: For example: "Each major section or subsection should be consecutively numbered: 7.3, 7.4, 7.5, etc." Also, forms, checklists, third-party manuals to be used.

Verification/Authorization/ Approval

The title and name of the person responsible for this document having been approved for circulation.

Revision History

Provide dates and brief description of any changes or updates to policy/procedure[Nancy: Brief description here?]

Sample Content for Policy and Procedure Manuals

Sample content is not comprehensive or relevant for all settings. These lists are provided as suggestions only. Organizations should base content on applicable laws and requirements and seek appropriate input, including legal counsel.

Employment-Related Policies and Procedures

- Employee orientation
- Job descriptions
- Performance appraisal
- Work schedules
- Standards of conduct
- Anti-harassment and discrimination
- Whistleblower protection
- Compensation
- Professional/career development
- Employees' external activities
- Benefits (leave, insurance, pension and retirement)
- Inclement weather
- Social media
- Employee dress code

Scope of Services (descriptions of each)

- Outpatient physical therapy
- Outpatient occupational therapy
- Home care physical and occupational therapy
- Health, wellness, and prevention
- Pediatric early intervention
- Wound care services

Emergency Preparedness, Safety, and Infection Control

- Emergency evacuation plan and map
- Medical record procedures
- Recovery of patient records
- Maintenance of records
- Medical emergency procedures
- Fire safety procedures
- CPR and Use of AED (automated external defibrillators)
- Infection control guidelines
- Standard precautions

- Hand washing
- Blood borne pathogens
- Incident reporting, including forms (patient, visitor, and employee)
- Disposal of contaminated/hazardous materials
- Mandatory reporting of abuse and neglect
- Equipment safety, maintenance, and checklists
- MSDS Forms (material safety data sheets)

Facility Operations

- Patient privacy, including HIPAA regulations
- Patient bill of rights
- Security
- Telephone procedures
- Patient scheduling/transport
- Payment policies
- Cancellations and no-shows
- Use of office equipment
- Organization and appearance of facility

Patient Care/Best Practice

- Documentation
- Peer review process
- Billing procedures
- Inter-professional communication
- Risk management related to allegations of sexual misconduct
- Expectations of behavior related to specific clinical services (iontophoresis, wound care, etc)
- Storage of medication
- Equipment maintenance
- Cleanliness and organization of clinic area
- Conduct during patient care (telephone interruptions)
- Supervision of support personnel
- Student roles in patient care
- Performance improvement

Reference Materials and Content from External Sources

- Relevant federal and state laws and regulations
- Regulatory or accreditation requirements
- Family and Medical Leave Act
- Equal Employment Opportunity Act
- Fair Labor Standards Act
- Occupational Safety and Health Administration
- Americans with Disabilities Act

- Sexual harassment (Title VII of Civil Rights Act of 1964)

** Sample content is not comprehensive or relevant for all settings. Organizations should base content on applicable laws and requirements and seek appropriate input, including legal counsel.*

Accessible and up to date. There are many compelling reasons to maintain policies and procedures in an electronic format. Maintaining electronic documents allows all employees to have easy access to the same information. Printed manuals quickly become outdated and can bring confusion if an old manual is referenced by mistake. If printed manuals are used, however, make certain that they are in loose-leaf format, with numbered pages, so that changes and additions can be made without requiring full revision. Consider including a cover page that includes references to all revisions since the most recent publication date.

Positive. Replace "don'ts" with "dos." Focus on expectations rather than on rules. Provide rationales whenever appropriate.