

Corporate Policy Review for MRM

Recommendations Received: March 22, 2021

Corporate Review Period:

Corporate Review Revisions Sent Out to Hospitals:

Policies Reviewed: Infection Control Manual, Employee Health Manual, HIPAA Manual, and HIM Policies

1. Please review the document below for the feedback to the policies/forms that were submitted. The Corporate Policy Review Committee has made every effort to review and discuss the feedback that we received. We appreciate your feedback in ensuring that we are able to provide sound, evidence-based policies and procedures that meet the needs of your hospital.
2. Please review each item to see what the proposed change/revision or question was raised for review. Each policy or form is bolded to delineate when another policy/form is discussed. All of the same named policies/forms are grouped together.
3. All policy/form changes will be uploaded to the ShareFile. Go to ShareFile > Shared Folders > Cohesive Healthcare & Management Folder > Clinical > Select appropriate file.
4. Policies that need to be changed with your header and date and archived in your policies are:

Policy/Form	Proposed Change/Revision or Question	Submitted By	Corporate Review	Instructions	Final Change/Revision
HIPAA Manual (Policies and Forms)					
FMHP-001: Authorization to Release PHI FMHP-008: Patient Request for Health Information	Currently, we use the Oklahoma Standard Authorization to Use or Share PHI form to release PHI. Our preference would be to continue the use of this form instead of FMHP-001 or FMHP-008. If this is not feasible, I believe there is only a need for one of the aforementioned forms. Of the two, the preference would be FMHP-001 with the following revision: revision – add “legal” as a selection under disclosure purpose.	Pawhuska	<p>Chee note: Keep FMHP-001 and add “legal” as a selection under disclosure purpose.</p> <p>Keep FMHP-008 as it is referenced in policy HIP-002 for patient request vs. authorization form.</p>	<p>Retire the current Oklahoma Standard Authorization to Use or Share PHI.</p> <p>FMHP-001 & FMHP-008 will be utilized as instructed per HIP-001 and HIP-002</p>	FMHP-001: Added “legal” as a selection under disclosure purpose
FMHP-008: Patient Request for Health Information FMHP-019: Notice of Privacy Practices	On the Patient Privacy Notice (FMHP-018), there is a place for patient signature on page 2 which I assume is an acknowledgement of the notice. It seems redundant to have the patient sign there & also sign the Patient Acknowledgement of Notice of Privacy Practices (FMHP-019). Could the signature line be removed from FMHP-018 or disregard FMHP-19 in its entirety?	Pawhuska	<p>Chee note: Remove patient signature on the FMHP-018 and keep FMHP-019 as is.</p>	<p>Both forms FMHP-018 & FMHP-019 will be utilized as instructed per HIP-004</p>	FMHP-018: Removed patient signature
HIP-002: Release of medical information and request for restrictions and confidential communication:	On the first page under the word Minor in bold: Was unsure if it made them not a minor or just made them treated differently like an emancipated or married etc minor.	Prague	<p>Chee Note: The following definition pulled from HIP-002 makes the patient a minor. I recommend leaving the definition as is with no changes.</p> <p>Minor - Any person under the age of eighteen (18) years of age, except such person who is on active duty with or has served in any branch of the Armed Services of the United States shall be considered an adult.</p>	<p>Leave policy as is. The bolding is the same for all definitions.</p>	No revisions.

FMHP-001: Authorization to Release PHI	the very last words on the bottom are half way cut off	Prague	Chee Note: I am re-submitting FMHP-001 to make sure Prague has the correct formatted policy. I recommend making no changes to this policy.		Form resubmitted to make sure the form has the correct formatting. No changes made to the form or policy.
HIP-005: Accounting of Disclosures	Red needs omitted since we do not have an EHR in place. (I already emailed this attached revised, in red, policy to you on 3/23/21)	Prague	Chee Note: I agree.		Corrected. Only areas left are those were specific information related to hospital or EHR system needs to be inserted. Prague will need to revise to identify there specific system for tracking.

Employee Health Manual (Policies and Forms)

EHP-001: Employee Health Program	Line #11 - Healthcare worker vs health care worker	Pawhuska			Revised: healthcare worker HOLDING POLICY UNTIL FURTHER CLARIFICATION OF FMEH-001 BY CORPORATE
EHP-001: Employee Health Program	Suggestion: adding language to clarify or define the pre- employment documentation timeline The pre-employment examination documents should be returned to “who” when completed and become part of the employee’s employee file within “?” days of hire. - Inconsistent spacing on page 4 between lines 6, 7, 8	Pawhuska			Revised: The pre-employment documents are returned to the Employee Health nurse prior to the first working day , who will maintain a separate, confidential employee health file. Spacing issues resolved
EHP-001: Employee Health Program	Bullet list margins not consistent on page 5	Pawhuska			Fixed bullet points
EHP-001: Employee Health Program	Suggestion: add “include” to the following statement: Page 5 > number 5 : item a- Illnesses that require reporting include but are not limited to:	Pawhuska			Revised: Situations that may result in an “ill” employee being restricted from work may include but are not limited to:
EHP-001: Employee Health Program	Suggestions for Health and Safety Education	Pawhuska			Revised: Personnel health and safety education will be provided by the Hospital upon hire; during

	<p>*New employees must attend the infection prevention and control orientation within “?” days of hire.</p> <p>*At a minimum, the following topics are included in the initial and ongoing training on infection control and prevention:</p> <ul style="list-style-type: none"> -Hand washing vs hand hygiene -Sharps Injury Prevention? 				<p>the initial orientation process, annually, and whenever the need arises, with in-service training and education on appropriate safety and infection control topics for their work assignments, so that personnel can maintain accurate and up-to date knowledge about the essential elements of safety and infection control.</p> <p>Revised: Hand Hygiene; Center for Disease Control (CDC) and World Health Organization (WHO) evidence-based practices and guidelines.</p> <p>Added: Sharps injury prevention.</p>
FMEH-001: Employee Health Questionnaire Form	Form is on hold per further review.	Corporate		Will send document upon final review: target goal 4/5/21.	
FMEH-002: Isihara Color Blindness Test Instructions		Corporate	This form is part of policy EH-001 and will hold until FMEH-001 has been clarified and send policy and all forms together		HOLD FORM UNTIL FMEH-001 HAS BEEN CLARIFIED BY CORPORATE
FMEH-003: Isihara Color Blindness Test		Corporate	This form is part of policy EH-001 and will hold until FMEH-001 has been clarified and send policy and all forms together		HOLD FORM UNTIL FMEH-001 HAS BEEN CLARIFIED BY CORPORATE
FMEH-004: Employee Isihara Color Blindness Test Form		Corporate	This form is part of policy EH-001 and will hold until FMEH-001 has been clarified and send policy and all forms together		HOLD FORM UNTIL FMEH-001 HAS BEEN CLARIFIED BY CORPORATE
FMEH-005: Employee Health Log		Corporate	This form is part of policy EH-001 and will hold until FMEH-001 has been clarified and send policy and all forms together		HOLD FORM UNTIL FMEH-001 HAS BEEN CLARIFIED BY CORPORATE
FMEH-006: Employee Illness & Occupational Illness & Injury Log		Corporate	This form is part of policy EH-001 and will hold until FMEH-001 has been clarified and send policy and all forms together		HOLD FORM UNTIL FMEH-001 HAS BEEN CLARIFIED BY CORPORATE
FMEH-011: Bloodborne Pathogens Post-	some of the headers and words have been cut off some	Prague			Due to the excel format, the Hospital may have to adjust the

Exposures Follow-up Plan					margins and do a prevent preview of the document.
Infection Control (Policies and Forms)					
ICP-018: Device Associated Infection Prevention	highlighted area on section 7 letter J. That highlight might need to be removed.	Prague	Corrected		Removed highlights from section 7 letter J.
FMIC-011: IC/Safety Construction Risk Assessment and Permit	spelling error towards the bottom of first page, beginning is spelled incorrectly.	Prague	Corrected		Corrected spelling for the word beginning on the IC Safety Construction Risk Assessment and Permit.
ICP-034 Patient Influenza & Pneumococcal Vaccination	Remove the 2020 Vaccination Schedules (these documents are updated annually). Need to print out and not include as part of the policy.	I. Bowden	See changes/revisions		Change: Added ADDITIONAL RESOURCES For current guidance on vaccine recommendations refer to the CDC website: CDC Immunization Schedules at https://www.cdc.gov/vaccines/schedules/ . CDC guidance on vaccine recommendations should be checked at the start of each year for recommendations and guidance by the Infection Preventionist.
ICP-013 TB Control Plan	Recommendation to create Patient TST form.	Carnegie	See changes/revisions		Individuals with suspected TB should have a tuberculin skin test unless there has been a previous positive skin test, a chest x-ray, and or up to 3 negative early morning sputum specimens for acid-fast bacillus (See FMIC-015 Patient Tuberculin Skin Test Form).
FMIC-015 Patient Tuberculin Skin Test Form	New form	Carnegie	See changes/revisions	To be used when administering a TST to a patient.	Added form: See FMIC-015 Patient Tuberculin Skin Test Form.
HIM (Policies and Forms)					
HIM-012: Scanning Documents into the EHR	entire policy is irrelevant at this time and should also be omitted.	Prague	Agree, until Prague has an EHR this policy would not be implemented.		
