



**DEPARTMENT OF MENTAL HEALTH
POLICY/PROCEDURE**

SUBJECT POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	POLICY NO. 106.17	EFFECTIVE DATE 10/17/2011	PAGE 1 of 11
APPROVED BY:  Director	SUPERSEDES 300.01 10/17/2011	ORIGINAL ISSUE DATE 11/01/2001	DISTRIBUTION LEVEL(S) 1

PURPOSE

- 1.1 To provide a centralized, uniform system for department-wide development, review, approval, distribution, and periodic updates of Los Angeles County - Department of Mental Health (LAC-DMH) policies and procedures.
- 1.2 To guide the identification of policies which are applicable to LAC-DMH directly operated and contractor programs.

DEFINITIONS

- 2.1 **Policy:** A statement of LAC-DMH position or approach to an issue
- 2.2 **Procedure:** Defines the implementation of the policy by outlining the steps employees are expected to take to assure appropriate implementation of the policy.
- 2.3 **Area Experts:** Those individuals who have been identified as having significant professional knowledge and experience in specialized areas. Area experts are viewed as capable of developing or revising an LAC-DMH policy to provide a best practice for the Department.
- 2.4 **Executive Sponsor:** The LAC-DMH executive who is responsible for the development of a new policy or policy revision.
- 2.5 **Distribution Level 1 Policy:** Policy guidance applicable to directly operated programs only. Level 1 policies will be posted on the LAC-DMH intranet.
- 2.6 **Distribution Level 2 Policy:** Policy guidance applicable to directly operated and contractor operated programs. Level 2 policies will be posted on the LAC-DMH intranet and internet sites.



SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE
POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	106.17	10/17/2011	2 of 11

- 2.7 **Distribution Level 3 Policy:** Policy guidance applicable to directly operated and contractor operated programs engaged with Healthy Way LA. Level 3 policies will be posted on the LAC-DMH intranet and internet sites.
- 2.8 **Subsidiary Policy/Guidance Manuals:** Policies and procedures which are unique to an operational unit within the Department. Examples include the Finance Directors Manual and the Central Jail Manual. (See Section 6.1)
- 2.9 **Policy Status Changes:**
 - 2.9.1 Temporarily Suspended: Temporary circumstances may occur that require an approved policy to be suspended until those circumstances cease.
 - 2.9.2 Discontinued: An approved policy that is going to be deleted may have its status changed on an immediate basis prior to it being formally deleted from the LAC-DMH Policy/Procedure Manual.
 - 2.9.3 Deleted: Any policy that is no longer needed is subject to a formal deletion process completed by the Responsible Party and Executive Management.

POLICY

- 3.1 LAC-DMH policies and procedures (policies) shall be developed or revised by area experts and/or responsible parties under leadership of Executive Sponsors and coordination with Compliance Program and Audit Services Bureau (CPAS).
 - 3.1.1 Area experts will develop new or revise existing policies and may have workgroups appointed to assist in conducting research, reviewing, and developing such policies and procedures.
 - 3.1.2 The Executive Management Team (EMT) will identify the Executive Sponsor and members of workgroups, as needed. Workgroup assignments shall be completed when the new or revised policy is approved.



**DEPARTMENT OF MENTAL HEALTH
POLICY/PROCEDURE**

SUBJECT POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	POLICY NO. 106.17	EFFECTIVE DATE 10/17/2011	PAGE 3 of 11
---	------------------------------------	--	-------------------------------

- 3.1.3 Area experts or the responsible party will present the new or revised policy at various review meetings (as needed) including presentations to EMT or unions.
- 3.1.4 Area experts will consult with CPAS to finalize new and revised policies.
- 3.1.5 Area experts or the responsible party should review and update respective policies as needed. As a general guideline, policies should be reviewed within 5 years of the effective date.
 - 3.1.5.1 Reviews and updates will be completed as required due to changes in best practices, or when a Federal or State statute or regulation changes or becomes effective and requires changes in policy or procedure.
 - 3.1.5.2 Similarly, if County policy changes, LAC-DMH will modify policies and procedures to maintain its compliant practices.

PROCEDURE

- 4.1 CPAS will facilitate the centralized and uniform system for Department-wide review, approval, distribution, maintenance and periodic updating of LAC-DMH policies and procedures.

PROCEDURE—CONTENT

- 4.2 The LAC-DMH Policy Manual is organized as follows:

Subject	Policy Numbers
Program Operations	100-199
Clinical Operations	200-299
General Administration/Community Relations	300-399
Financial Services	400-499
HIPAA Programs	500-599
Personnel/Payroll	600-799
Equipment and Supplies	800-899
Compliance Program	900-999



SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE
POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	106.17	10/17/2011	4 of 11

4.3 The Policy Format is as follows (see current template, Attachment 1):

4.3.1 Each Policy will incorporate the following eight (8) headers in the text. (Note that the Definition, Attachment, and Reference sections are to be used as needed).

4.3.1.1 **PURPOSE***: State the intent of the policy. If an existing LAC-DMH policy is being updated, a brief statement should be included to clarify or explain the need for the revision.

Specify that the policy is applicable to DMH only (Level 1), DMH and Contractor operations (Level 2), or Healthy Way LA programs (Level 3).

4.3.1.2 **DEFINITION**: Provide meaning of new or uncommon terminology that is used in the context of the policy. Additionally, definitions should be provided for words that may have more than one meaning such as the word “workforce”.

4.3.1.3 **POLICY***: Identify the LAC-DMH position or approach to the issue.

4.3.1.4 **PROCEDURE***: Briefly identify the operational steps necessary to effectively implement the policy.

4.3.1.5 **ATTACHMENTS**: List the documents or forms that are integral elements of the policy. CPAS will establish these documents or forms as hyperlinks (as specified by the area expert) to enable automated access to them.

Such hyperlinked documents will be relatively simple to modify and may not require the policy to be revised just to update the form unless the policy or procedure must also be revised. (Attachments need to be submitted in MS Word, MS Excel, or PDF formats.)

* Must be included



SUBJECT POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	POLICY NO. 106.17	EFFECTIVE DATE 10/17/2011	PAGE 5 of 11
---	------------------------------------	--	-------------------------------

Documents and forms that must be provided in languages other than English need to be translated by a bilingual certified individual.

- 4.3.1.6 **REFERENCES:** Identify applicable documents that support the policy’s position.
- 4.3.1.7 **AUTHORITY*:** Identify the basis of the policy. This may include legislation, Board of Supervisors’ Orders, statutes, codes, State DMH letters, mandates and/or other administrative directives.
- 4.3.1.8 **RESPONSIBLE PARTY*:** Indicate the name of office or organizational unit responsible for the policy and periodic reviews or updates of it.

PROCEDURE - POLICY DEVELOPMENT AND REVISION

- 4.4 A new policy or revision will be initiated when an Executive Sponsor or EMT determines one is needed to maintain compliance with changes in regulations, legal issues or best practices. The Executive Sponsor will assign area expert(s) or a workgroup to complete the task of drafting new or revised policy.
 - 4.4.1 It is the responsibility of the assigned area expert(s) and/or workgroup to review best practices and current statutory and regulatory requirements in developing new or revised policies.
 - 4.4.2 It is the responsibility of the assigned area expert(s) to determine the affected areas/parties for the policy and to specify if the policy is applicable to directly operated programs only, directly operated and/or contractor programs, or directly operated and/or contractor operated Healthy Way LA programs. Consistent with that determination, the distribution level for each policy must be identified per the definition in sections 2.5 – 2.7 of this policy.

* Must be included



**DEPARTMENT OF MENTAL HEALTH
POLICY/PROCEDURE**

SUBJECT POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	POLICY NO. 106.17	EFFECTIVE DATE 10/17/2011	PAGE 6 of 11
---	------------------------------------	--	-------------------------------

PROCEDURE - POLICY REVIEW

4.5 Following completion of a policy draft internal review, the Executive Sponsor or designated area experts shall forward the completed policy draft to CPAS for final review, editing, formatting and implementation.

4.6 The Clinical Policy Committee

4.6.1 All clinical practice policies must be coordinated with the Office of the Medical Director (OMD).

4.6.1.1 The policy will be presented to the Clinical Policy Committee (CPC) for discussion and review for consistency with best practices and regulatory requirements.

4.6.1.2 The CPC may require changes in the draft to ensure that best practices are maintained and regulatory requirements are achieved.

4.6.1.3 The CPC includes the LAC-DMH Risk Manager; hence the draft policy will also be assessed for risks.

4.6.1.4 The CPC includes the LAC-DMH Compliance Officer (or designee); hence the draft policy will also be assessed for compliance with applicable compliance standards.

4.6.1.5 The reviewed policy documents are to be forwarded to the Executive Sponsor.

4.7 CPAS Responsibilities

4.7.1 The Executive Sponsor or designee will forward final drafts of reviewed policies, with electronic copies of all attachments, to CPAS to finalize the document.



SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE
POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	106.17	10/17/2011	7 of 11

- 4.7.2 Final drafts need not be fully formatted when submitted as CPAS will finalize formatting for new and revised policy drafts for formal presentation.
- 4.7.3 CPAS will review each new or revised policy's Attachments, References, and Authority documents.
 - 4.7.3.1 Attachment forms. Whenever possible, forms will be hyperlinked in the posted policy to enable immediate access for all users. (If posted elsewhere on the DMH intranet, the current web link will be used to ensure only one version of the form exists).
 - 4.7.3.2 References and Authority documents. These may or not be hyperlinked at the discretion of the area experts.
- 4.7.4 CPAS staff will coordinate editing changes with the Executive Sponsor or area expert to support the completion process.
- 4.7.5 CPAS will coordinate with County Counsel, as required, to ensure that new or revised policies comply with applicable legal requirements.
- 4.7.6 CPAS will coordinate policy reviews with the DMH-HRB regarding union consultations.
 - 4.7.6.1 CPAS will regularly meet with DMH-HRB staff to review policy development and revision schedules. DMH-HRB will advise CPAS which policies will impact working conditions and/or wages and will be subject to union consultation.
 - 4.7.6.2 DMH-HRB will provide copies of new/revised policies to union representatives and will coordinate a timely consultation process. The consultation process will be limited to 10 working days. If no written feedback is provided to DMH-HRB by the union(s), the policy shall continue the review/approval process. DMH-HRB may provide courtesy copies of approved new/revised policies to the unions.



SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE
POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	106.17	10/17/2011	8 of 11

- 4.7.6.3 CPAS will forward completed policy drafts to the Chief Deputy Director and Director, or designee, for final review and implementation. Upon approval, the Director or designee must sign the policy.

PROCEDURE - DISTRIBUTION

- 4.8 CPAS will coordinate the implementation of completed policies as they are approved by the Director. CPAS will place policy/procedures and Policy Bulletins on the LAC-DMH intranet and internet sites and will distribute Policy Bulletins by email announcing new, revised, and deleted policies. (See Attachment 2, web link to Policy Bulletins)
 - 4.8.1 Level 1 (DMH only) policies will be posted on the LAC-DMH intranet site.
 - 4.8.2 Level 2 (DMH and Contractor) policies will be posted on the LAC-DMH intranet and internet sites.
 - 4.8.3 Level 3 (Healthy Way LA) policies will be posted on the LAC-DMH intranet and internet sites.
 - 4.8.4 Policy Bulletins will be distributed by email to ensure that LAC-DMH staff and Contractor Chief Executives.

PROCEDURE - POLICY MANUAL MAINTENANCE

- 5.1 The CPAS will maintain the DMH policy manual as individual electronic documents available on the LAC-DMH intranet and internet as well as one paper copy for the Master Policy Manual.
 - 5.1.1 CPAS will review the policy manual throughout the year to identify priorities for reviewing and updating.
 - 5.1.1.1 Targeted sections will be reviewed by responsible parties to verify that they are consistent with current practices,



SUBJECT POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	POLICY NO. 106.17	EFFECTIVE DATE 10/17/2011	PAGE 9 of 11
---	------------------------------------	--	-------------------------------

regulations, and laws. Changes will be incorporated as needed.

5.1.1.2 Targeted sections being reviewed may identify policies that are no longer needed. Rather than revising, such policies, they will be considered for deletion.

5.1.1.3 Targeted sections to be reviewed may identify a significant gap in the policies and result in a proposal for a new policy. CPAS should be advised of new or revised policies as that development or revision work is in process.

5.2 Temporarily Suspended, Discontinued and Deleted Policies are subject to a review and approval process by Responsible Parties and Executive Management. Such changes in status must be communicated to CPAS in writing. (See Attachment 3, Policy Status Change Form)

5.2.1 Temporarily Suspended: Temporary circumstances may occur that require a policy to be suspended until those circumstances cease. In this instance, the policy will include a watermark noting that it was suspended with an effective date. The status change will also be noted in a DMH Policy Bulletin.

5.2.2 Discontinued: An approved policy that is going to be deleted may have its status changed on an immediate basis prior to it being formally deleted from the DMH Policy/Procedure Manual. In this instance, the policy will include a watermark noting that it was discontinued with an effective date. The status change will also be noted in a DMH Policy Bulletin.

5.2.3 Deleted: Any policy that is no longer needed may be permanently removed from the Policy/Procedure manual following a formal deletion process completed by the Responsible Party and Executive Sponsor and Compliance Program Steering Committee. Deleted policies will be held in a paper copy in the Master File maintained by CPAS per current retention requirements (7 years or until the completion of the State audit,



**DEPARTMENT OF MENTAL HEALTH
POLICY/PROCEDURE**

SUBJECT POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	POLICY NO. 106.17	EFFECTIVE DATE 10/17/2011	PAGE 10 of 11
---	------------------------------------	--	--------------------------------

whichever is longer). The status change will also be noted in a DMH Policy Bulletin.

- 5.3 CPAS will maintain the DMH Policy/Procedure website on the DMH intranet and will coordinate with the CIOB staff to maintain the most current policies on the DMH internet site.
 - 5.3.1 CPAS will monitor the websites to verify policies are current and accessible.
 - 5.3.2 CPAS will organize and maintain the LAC-DMH intranet website containing policies.
 - 5.3.3 CIOB will organize and maintain the LAC-DMH internet website containing policies.

SUBSIDIARY POLICY / GUIDANCE MANUALS

- 6.1 Subsidiary manuals may be maintained by individual LAC-DMH organizational units. These manuals are for the purpose of providing specialized and/or technically detailed procedures, forms, or other attachments primarily by the staff within the unit. Policies appropriate for the LAC-DMH Policy Manual may make reference to the subsidiary manual for greater technical and procedural detail. The master subsidiary manual must be maintained in the subsidiary unit and when possible, a current digital edition should be available on the intranet.

It is essential that subsidiary policies or guidance documents NOT be identified as “DMH Policy / Procedures” but identify themselves with a title fitting of the function, i.e., Finance Director’s Procedure Manual or the Central Jail Guidance Manual.

ATTACHMENTS (Hyperlinked)

- 1. [Policy Template](#)
- 2. [List of LAC-DMH Policy Bulletins](#)
- 3. [Policy Status Change Form](#)



**DEPARTMENT OF MENTAL HEALTH
POLICY/PROCEDURE**

SUBJECT POLICY DEVELOPMENT, REVIEW, APPROVAL, AND DISTRIBUTION	POLICY NO. 106.17	EFFECTIVE DATE 10/17/2011	PAGE 11 of 11
---	------------------------------------	--	--------------------------------

RESPONSIBLE PARTY

LAC-DMH Compliance Program and Audit Services Bureau