ENVIRONMENT OF CARE® MANAGEMENT PLANS

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Since the advent of the term “Environment of Care®” (EC) in the mid-90’s, the Joint Commission has required seven management plans to address the areas of safety, security, hazardous materials and waste, emergency management, fire safety, medical equipment, and utilities. These plans are useful to the surveyors in that they provide a picture of how each process is being managed within the health care organization. They provide him or her with a basic knowledge such that compliance can be verified during the building tour, and questions can be asked of the staff members.

More than that, the management plans are also useful to the health care organization itself. They provide an “executive summary” of policies and procedures being used by the organization to manage the function. As such, they can be useful in educating the staff about their functions and roles in the environment of care. They can also be useful in explaining the EC function to the leadership of the organization.

Under the current survey process, the surveyors are first exposed to the EC management plans during the closed document review session on the first day of survey. This is their first introduction into the organization’s EC process, and since no one from the facility is there to answer questions, it is important that the plans be clear, concise, and easy to follow. The management plans are again presented to the surveyor during the EC document review session which precedes the building tour. As the 2004 survey process rolls out, the management plans are expected only to be reviewed during the EC interview.

All facilities included in a JCAHO survey process must be covered by a set of EC management plans. These plans can be written to address only an individual facility. When an organization includes several facilities and multiple sites, though, it may be more realistic to write one set of management plans that covers all of them. With this type of plan, it is essential that differences between the various facilities are highlighted within the plan itself, to ensure that the plan is specific to each location.

Format of the management plans is not prescribed by JCAHO. By far, the most common is a set of written plans, but matrices, flow charts, or other formats would also be acceptable. The length is not critical, but remember the closed document review requirement and don’t get too verbose. Most plans can be written in about five to seven pages, however, emergency management will usually be a little longer – maybe ten to twelve pages.

The most important item to be included in each management plan is an explanation of how each intent statement (element of performance in 2004) is met by the organization. Remember that JCAHO standards should be thought of as minimum requirements, so consider also covering appropriate information related to your program, and these are documents that are not just written for JCAHO.
One way of looking at the plans is that they should meet the minimum JCAHO requirements, but also comprehensively address the program, and unify it in one document. When exceeding the JCAHO requirements, however, note that you will be surveyed based on the requirements you set forth in your plan.

The anticipated 2004 standards requirements group requirements related to each management plan together. Common issues to all plans, such as reporting and investigating, performance monitoring, and annual evaluations, have been removed from the individual plan requirements and located together in what is expected to be standard EC.9.10. It is further anticipated that the orientation and education requirements from the EC chapter will be relocated to the Human Resources (HR) chapter. In this process, the detail that is currently included in the EC chapter may not be transferred to the new standard in HR, so it will be important that the history be retained in the management plan from a continuity perspective.

Despite this rearrangement and renumbering of the Environment of Care® standards, the management requirements will remain the same for 2004 as they have been in the past. All elements of performance listed under each EC management plan standard will be included, along with the common issues from EC.9.10, and the orientation and education from the HR chapter. While not required by JCAHO, a comprehensive approach to the plans might also include discussion of the associated standards to the management plan.

When writing new management plans, one place to start is at the end. Each plan must be evaluated annually in terms of objectives, scope, performance, and effectiveness. While not required by JCAHO, if these concepts are not written into the plans, it is difficult to evaluate them at the end of the year. A suggested plan structure would include a mission statement that identifies the purpose of the plan and supports the organization’s philosophy. The scope section could discuss the sites covered by the plan, the services offered under it, and, if appropriate, hours of operation and contracted services involved. A section on reporting relationships will convey to the reader how the plan fits within other organizational structures. Objectives will broadly identify what is being accomplished under the plan.

Elements of performance are the only true JCAHO requirements to be addressed by the plan. Each should be briefly discussed in anywhere from a few sentences to a few paragraphs. Enough information should be provided to give the surveyor a basic understanding of the process and an ability to ask informed questions. Rather than repeating information from associated policies and procedures, these documents can be cross-referenced in the plans. If a given element of performance is not applicable to an organization, that should be so stated in the plan. Omission of an element of performance can lead to adverse scoring by the surveyor.
In 2004, scoring will be on a scale of 0-2 for each element of performance, with 0 representing that the element of performance has not been met. A score of 2 means that the element has been met, and 1 means partially met. The “partially met” designation refers to rate-based requirements only, such as a 95% rate of preventive maintenance or generator testing done on a monthly basis.

All seven management plans have certain common elements.

Risk assessment is specifically identified for the Safety Management Plan. In security, the risk assessment concept falls under the topic of “addressing security issues.” Under hazardous materials and waste, the risk assessment is based on chemicals in the inventory and their associated material safety data sheets. Performance of the hazard vulnerability analysis is the required risk assessment for emergency management. Both medical equipment and utilities management have requirements for developing an inventory that is based on risk assessment.

The concept of “reporting and investigating” relates to the issue of ICES, the information collection and evaluation system, which encompasses the information flow into and out of the Safety Committee. In safety management, patient, visitor, and staff injuries are reported. Security incidents are reported for security management, and spills and exposures for hazardous materials and waste. Fire safety, medical equipment, and utilities management all require reporting of problems, failures, and user errors.

Performance monitoring is required under each management plan. Each must have at least one ongoing monitor in an area of actual or potential risk for which data is regularly collected and reported to the Safety Committee for analysis. Based on the analysis of the individual plan monitors, annually the committee makes a recommendation to the leadership of the organization for at least one performance improvement activity in the Environment of Care®.

Each management plan also has related issues which may be considered for inclusion. Some may be contained within associated standards, such as smoking for safety management. Other topics may be added as appropriate to the management of the program. Those that could be considered for safety would include:

- Relationship to patient safety
- Safety Committee structure and function
- Employee health
- Ergonomics
- Pre-construction risk assessment
- OSHA issues

Forensic staff education and workplace violence might be included in the Security Management Plan. Hazardous materials and waste could include the
MSDS process used by the organization, or potentially the role of the chemical hygiene officer if the laboratory is JCAHO accredited. Emergency drills could be included with the Emergency Management Plan, as could fire drills for fire safety. Other standards-associated fire safety topics include the Statement of Conditions™, interim life safety measures, and maintenance, testing, and inspection.

The Medical Equipment Management plan might include the standards-related issues of maintenance, dialysis water, and sterilizer testing. If the organization’s laboratory is JCAHO accredited, the related laboratory equipment issues could be written into the plan. Utilities management again has maintenance issues, but also emergency electric power distribution and requirements for emergency generator testing.

Returning again to the annual evaluation of each plan, this evaluation will be the minimum communication to the leadership of the organization from the Environment of Care®. It will represent the accomplishments of each program for the year. The objectives section will analyze the accomplishment (or lack thereof) of each objective put forth in the plan. Analysis of the scope will determine if there are changes to be made. The performance section should include the performance monitoring data for the management plan, thus creating a data-driven annual evaluation. Finally, under effectiveness, there can be a subjective analysis of how the process worked during the year.
ENVIRONMENT OF CARE®
MANAGEMENT PLANS

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7 REQUIRED PLANS

- Safety
- Security
- Hazardous Materials & Waste
- Emergency Management
- Fire Safety
- Medical Equipment
- Utilities
PURPOSE

• Surveyor
  – “Snapshot” of process
  – Verification of compliance
  – Identification of questions

• Health Care Organization
  – Executive summary of policies & procedures
  – Educate staff
  – Educate administrators
SURVEYOR EXPOSURE

• 2003
  – Closed Document Review Session
  – EC Document Review Session

• 2004
  – EC Document Review Session
TYPES OF PLANS

• Individual facility
  – All facilities included in JCAHO survey must be covered by a plan

• “Umbrella”
  – All facilities of one organization
  – Differences in facilities must be identified
PLAN FORMAT

• Written plans
• Matrices
• Flow charts
• Etc.
• Length not critical
  – Most approximately 5-7 pages
  – Emergency Management 10-12 pages
CRITERIA

• Specific to facility
• Address each element of performance
• Clear and concise
• JCAHO standards are minimum requirements
ARE WE REALLY WRITING THESE JUST FOR JCAHO?
PHILOSOPHY

• The management plan should
  – Meet JCAHO requirements
  – Comprehensively address the program
  – Unify all aspects of the program

• Note that you will be surveyed based on what you write
STANDARDS REQUIREMENTS

• EC.1.10: Safety
  – EC.1.20: Maintains safe environment
  – EC.1.30: Smoking
• EC.2.10: Security
• EC.3.10: Hazardous Materials & Waste
• EC.4.10: Emergency Management
  – EC.4.20: Emergency drills
STANDARDS REQUIREMENTS

• EC.5.10: Fire Safety
  – EC.5.20: LSC Compliance
  – EC.5.30: Fire drills
  – EC.5.40: Fire safety maintenance
  – EC.5.50: ILSM

• EC.6.10: Medical Equipment
  – EC.6.20: Maintenance, Testing, Inspection
STANDARDS REQUIREMENTS

- **EC.7.10**: Utilities
  - **EC.7.20**: Emergency Power
  - **EC.7.30**: Maintenance, Testing, Inspection
    - **EC.7.4.0**: Generator testing
    - **EC.7.5.0**: Medical gas and vacuum
STANDARDS REQUIREMENTS

• EC.9.10: Monitoring Conditions
  – Reporting & investigating
  – Performance monitoring
  – Annual evaluation

• NOTE: Orientation and Education requirements are in HR.3.1
SO WHAT’S IN THE PLAN... AND WHAT’S NOT
WHAT’S IN?

• Each element of performance under EC X.10
• Reporting and investigating (EC.9.10)
• Performance monitoring (EC.9.10)
• Annual evaluation (EC.9.10)
• Orientation and education (EC.3.1)
IF IT WAS REQUIRED PREVIOUSLY, IT’S REQUIRED FOR 2004
POTENTIAL INCLUSIONS

• EC.X.20, X.30, etc.
  – Misc. associated standards
  – Drills
  – Maintenance
  – Etc.

• Comprehensive approach

• Unify program
WHAT’S OUT?

NOTHING.
ORIENTATION AND EDUCATION

• HR.3.1
• General language
• No specifics from EC.2.8 (2003)
• No specifics in management plan standards
• Potential loss of history
STARTING POINT

• Consider the annual evaluation
  – Objectives
  – Scope
  – Performance
  – Effectiveness
PLAN STRUCTURE

• Mission Statement
• Scope
• Authority / Reporting Relationships
• Objectives
• Elements of Performance*

*Only part specifically required by JCAHO
MISSION STATEMENT

• Purpose of the plan
• Reflects organizational philosophy
• Should not conflict with organization’s mission statement
SCOPE

• Sites covered by plan
• Services offered
• Hours of operation
• Contracts
• Etc.
REPORTING RELATIONSHIPS

• Responsibility for plan
• Relationship to organization leadership
• Relationship to EOC committee
OBJECTIVES

• What are you trying to accomplish?
• Broad-based
• Requires planning
• Evaluation
ELEMENTS OF PERFORMANCE

• Brief
  – Few sentences to few paragraphs
• Enough information for surveyor
  – Basic understanding of the process
  – Ability to ask questions
• Explain organizational management of topic
• Cross-reference policies and procedures
ELEMENTS OF PERFORMANCE

• If not applicable, so state in the management plan with rationale
• Omission of EP’s will result in recommendations
SCORING

• Meets element of performance – score 2
• Partially meets – score 1
  – Rate-based requirements
• Does not meet – score 2
COMMON PLAN ELEMENTS

• Risk assessment
• ICES (reporting and investigation)
  – Except Emergency Management
• Orientation and education
• Emergency procedures
• Performance monitoring
• Annual evaluation
RISK ASSESSMENT

• Safety: Risk assessment
• Security: Security issues
• Hazmat: Chemical inventory & MSDS
• Fire Safety: SOC
• Emergency Management: HVA
• Medical Equipment: Inventory
• Utilities: Inventory
ICES

- Safety: patient, visitor, staff injury
- Security: security incidents
- Hazmat: spills & exposures
- Fire Safety: problems, failures, user errors
- Medical Equipment: problems, failures, user errors
- Utilities: problems, failures, user errors
PERFORMANCE MONITORING

• Reporting to Safety Committee
• Analysis
• Recommendation of EC performance improvement activity to leadership
POTENTIAL INCLUSIONS

SAFETY

• Smoking
• Relationship to patient safety
• Safety Committee
• Employee health
• Ergonomics
• Pre-construction risk assessment (ICRA)
• OSHA issues
POTENTIAL INCLUSIONS

SECURITY
• Forensic staff education
• Workplace violence

HAZARDOUS MATERIALS & WASTE
• MSDS process
• Chemical hygiene officer (if lab is JCAHO accredited)
POTENTIAL INCLUSIONS

EMERGENCY MANAGEMENT

• Drills

FIRE SAFETY

• SOC and *Life Safety Code®* compliance
• ILSM
• Fire drills
• Maintenance, testing, inspection
POTENTIAL INCLUSIONS

MEDICAL EQUIPMENT

• Maintenance, testing, inspection
• Lab issues (if lab is JCAHO accredited)
• Dialysis water
• Sterilizers
POTENTIAL INCLUSIONS

UTILITIES

• Maintenance, testing, inspection
• Emergency electric power distribution
• Generator testing
ANNUAL EVALUATIONS

- Minimum communication to leadership
- Represent accomplishments for the year
- Objectives
- Scope
- Performance
- Effectiveness