

Clarifications and Expectations

Environment of Care Management Plans

Making Sure Your Plans Get the Job Done

*The Joint Commission has identified the need to increase the field's awareness and understanding of the Life Safety Code®. * To address this need, The Joint Commission Perspectives® publishes the column Clarifications and Expectations, authored by George Mills, MBA, FASHE, CEM, CHFM, CHSP, director, Department of Engineering, The Joint Commission. This column clarifies standards expectations and provides strategies for challenging compliance issues, primarily in life safety and the environment of care, but also in the vital area of emergency management. You may wish to share the ideas and strategies in this column with your facility's leadership.*

Effective management plans are essential for taking charge of the environment of care (EC). These high-level documents, required of accredited organizations for all health care settings (with the exception of office-based surgery and home care programs), should guide your organization's operations to minimize risk and support strong performance in the six key EC functional areas shown in the box at right.

The Intent of the Plans

Although management plans should bring the various EC functions into focus, they are not meant to be overly detailed. You could think of them as a series of executive summaries which show that your organization is managing the EC and complying with Joint Commission standards. In fact, management plans shouldn't necessarily detail *how* things are done but should provide assurance that there are processes in place to get things done and respond to risk. For example, an organization's utilities management plan might say:

Although Acme Hospital does not monitor for Legionella bacteria, there is a process in place whereby the organization can implement mitigation strategies when notified by the infection control department of a potential outbreak.

* Life Safety Code® is a registered trademark of the National Fire Protection Association, Quincy, MA.

Six Management Plans Plus

The Joint Commission's Environment of Care (EC) standards require organizations to develop management plans in six functional areas*:

1. Safety
2. Security
3. Hazardous materials and waste
4. Fire safety
5. Medical equipment
6. Utilities

* An organization is also required to have a written Emergency Operations Plan and a current Statement of Conditions, but these have different parameters than management plans. See the "Emergency Management" and "Life Safety" chapters in your *Comprehensive Accreditation Manual* for a complete description.

This statement provides assurance that the organization has a mitigation strategy and knows when to activate it. But it does not detail what the strategy is or how it will be implemented. At this point, the utilities management plan might refer to a separate policy or procedure with greater detail about specific mitigation strategies and their uses.

Taking a Thoughtful Approach

As your organization creates or revises its management plans, keep the following points in mind:

- *Don't cite the standards.* Reviewing The Joint Commission standards related to EC is a helpful first step in developing management plans. Each management plan must address the pertinent EC standards and their elements of performance (EPs), so it is crucial that plan developers understand what those EPs require. However, merely restating the EPs or listing standard numbers in the management plans is not appropriate. Surveyors know the standards and EPs, so you don't need to repeat them in your management plans. Plus, the standards may change slightly from

year to year, and it can be tedious to constantly amend a plan due to shifting standard-related content. With that said, the safety officer may choose to annotate a master copy of the management plans with the standard numbers to ensure that the plans address every relevant EP. This can also help during survey because if needed, the surveyor can quickly see how your organization complies with specific standards.

- *Determine the shape of the plans.* Although The Joint Commission requires organizations to have management plans that address the six EC functional areas, it is not prescriptive about the format of the plans. For example, plans can be individual documents or consolidated into one document. Individual documents that address each aspect of the EC undoubtedly enhance the specificity of the management plans, making them unique for each aspect of the EC. However, this may prove too cumbersome for your organization and may cause unintended confusion. To streamline the plans, you might want to write one set of consolidated plans that covers all your organization's functions.

Another approach would be one document that covers the topic areas that apply to all management plans and adjunct plans that highlight the work specific to the various functional areas. The standards require that all management plans address the topics shown in the box at top right.

An overall plan could describe each function as it relates to the entire EC management process, and detailed attachments can then dig more deeply into the particulars of each topic area for the six required plans.

- *Keep a consistent structure.* To ensure that your management plans are easy to navigate, understand, and use, you may want to keep the structure of the plans consistent. For example, each plan could start with a mission and vision statement, a description of plan scope, and a list of objectives. A plan could then list compliance details and end with a brief discussion about how performance will be measured and how the plan will be evaluated. By keeping plans consistent, any individual can pick up any plan and know where to find certain information.
- *Cite supporting material.* To provide information and also prevent management plans from becoming unwieldy, you might want to cite supporting policies in the plans and describe how readers can access those policies. This might include cross-referencing the appropriate policies and procedures or providing a list of them in an addendum to the plan.

Management Plans Key Topics

All environment of care management plans must address the following topics:

- Risk assessment
- Staff development
- Emergency response and procedures
- Inspection, testing, and maintenance
- Information collection and evaluation
- Performance monitoring
- Annual evaluation

- *Comply with the strictest authority having jurisdiction (AHJ).* Don't forget the rule of thumb that you must always comply with the strictest AHJ. For example, EC requirements state that only one fire drill per shift per year is needed in freestanding business occupancies. But if the local fire marshal requires more frequent drills, an organization must honor that requirement. Conversely, if the local AHJ requires only one drill every two years, an organization is still required to have one per shift per year according to The Joint Commission, which then acts as the strictest AHJ. Your management plans should highlight when the AHJ is not The Joint Commission and indicate that you are meeting the stricter authority's requirements.
- *Remember related Joint Commission standards.* Standards from other chapters of the accreditation manuals can affect the EC. Because of this, you might want to address some of these standards in your management plans. For example, standards from the "Emergency Management" (EM), "Life Safety" (LS), "Infection Prevention and Control" (IC), "Human Resources" (HR), and "Leadership" (LD) chapters might apply to EC efforts and should be considered in an organization's management plans. A management plan that refers to other standards will yield a more complete picture of the management process for each EC area and will create a safer environment for patients.
- *Distribute the plans appropriately.* The Joint Commission requires organizations to have management plans in every site accredited by The Joint Commission. Unfortunately, surveyors often find that organizations' off-site locations don't have management plans or that the plans don't apply to the alternative setting. For example, if a hospital has several physician offices and a rehabilitation center, The Joint Commission would expect to see the management

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A Rubric for Management Plans

By scoring your performance for each of the following statements, you can see whether your management plan development process is on track or needs improvement.

Score each statement below with a number between 1 and 5, with 1 being “do not agree” and 5 being “completely agree.”

1. We address each EC standard’s element of performance.	1	2	3	4	5
2. We involve subject matter experts in plan development.	1	2	3	4	5
3. We clearly outline the plan’s objectives and scope.	1	2	3	4	5
4. We clearly describe a method for monitoring performance.	1	2	3	4	5
5. We outline a process for determining plan effectiveness.	1	2	3	4	5
6. We detail the annual evaluation process.	1	2	3	4	5
7. We direct the reader to supplemental information.	1	2	3	4	5
8. We have a process for ensuring that policy reflects practice.	1	2	3	4	5
9. We consider other standards chapters.	1	2	3	4	5
10. We respect the strictest authority having jurisdiction (AHJ).	1	2	3	4	5

A Scoring Scale

After scoring all statements, total the scores to obtain an overall grade. Then compare your score against the following list:

- 40–50—Your management plan development approach is sound and should yield well-considered plans that accurately reflect your organization’s performance and compliance efforts.
- 20–39—Your management plan development approach is acceptable but could benefit from a refreshed look and some minor changes. Spend time reviewing your methodology and thinking about how to make it better.
- 0–19—Your management plan development approach will not yield adequate plans, and you could be jeopardizing the safety and security of patients, staff, and visitors. You should promptly review and retool your processes for developing plans.

Source: Joint Commission Resources

plans at each of these facilities reflect the activities that occur in the off-site location.

To make creating organizationwide management plans easier, you might consider starting with a primary plan (for example, for the hospital) and adapting it to different settings. This is a fine approach, but be careful not to just copy the primary plan. You should instead review the plan and revise it to address the unique aspects of the targeted secondary setting. For example, a hazardous materials management plan for a physician office should look distinctly different from that for a hospital. Although the hospital might mention mitigation strategies for Legionella, the physician office should not address this topic unless it has such mitigation strategies in place. Remember, Joint Commission surveyors expect you to comply with your own requirements and hold you to whatever you include in your management plans.

Although the requirement for management plans has existed since the mid-1990s, and most organizations comply with this standard, you should not assume that your approach to management plan development is flawless. To

yield the best possible plans, it may be beneficial to revisit your methodology and determine whether changes should be made. The rubric above can help you assess whether your efforts are on track or whether you need to rethink your approach.

Not Just a “Requirement”

The EC management plans should be more than just a compliance exercise for your organization. To provide true value, staff and leaders must think of them as a way to achieve and constantly maintain a safe environment. If your organization views your management plans as an opportunity for transparent communication and designs them to be a roadmap to EC management, the plans can help lay the foundation for a safe and responsive EC.

This month’s column, which also appears in the June 2013 issue of Environment of Care® News, discusses environment of care management plans. Next month’s column will continue to focus on maintaining various life safety features. 