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PURPOSE

The Quality Of Care Guidelines for Free and Charitable Clinics are intended to provide a framework for each clinic to self evaluate performance against recognized industry standards in specific areas relevant to free clinic work. These guidelines may be used in establishing new clinics and for periodic self-review by existing clinics. Please note that the “Suggested ways to demonstrate criterion is met" represent examples of ways in which the criterion can be satisfied, and are not intended to be inclusive of all possible approaches.

It is the belief of the Washington Healthcare Access Alliance Quality of Care Commission that those delivering free care can be guided and the care of patients enriched by the establishment of accepted norms of care. Through the process of continuous self-assessment of processes and related outcomes, a climate of constant review and improvement is created versus one of complacency.

The guidelines were developed over a period of several years with input from many groups and individuals. This document is structured liberally enough to allow adaptation to a variety of clinic settings, yet possess sufficient rigor to provide guidance to quality patient care.
1. **A mission statement guides the operation of the clinic.**

   **Criterion:** A board approved mission statement or global ends statement is written and outlines the purpose of the organization.

   Suggested ways to demonstrate criterion is met:
   - Minutes of the governing body board meeting indicate the exact language and date of adoption of the mission or global ends statement.
   - A statement of the mission statement appears in various organizational publications.

2. **Articles of incorporation and bylaws guide the actions of the governing body.**

   **Criterion:** Written articles of incorporation and bylaws for the board of directors or equivalent leadership body define composition, term of office, roles and responsibilities, scope of authority and succession processes.

   Suggested ways to demonstrate criterion is met:
   - Decisions based on written articles of incorporation, bylaws and policies established for the organization are reflected in the minutes of the meeting of the governing body.

3. **The organizational structure is documented.**

   **Criterion:** The organizational structure is documented.

   Suggested ways to demonstrate criterion is met:
   - A printed organizational chart is current and available.
   - Minutes of governing body board meeting document approval of organizational chart structure.

4. **There is provision for financial resources.**

   **Criterion:** Financial policies have been adopted which define required cash-on-hand provisions and adequate resources exist for sound operation of the clinic.

   Suggested ways to demonstrate criterion is met:
Records indicate the board or equivalent leadership body approved financial policies that define requirements for cash-on-hand minimums to sustain sound operations.

Review of current profit and loss statements, annual budget, balance sheets, and other financial statements indicate compliance with policies.

5. **Clinic operation is guided by written policies and procedures.**

**Criterion:** Written operations policies have been developed and are periodically reviewed.

Suggested ways to demonstrate criterion is met:
Records indicate that the board, executive director or equivalent leadership body approved policies that are in place and policies dictate frequency of review.

6. **A process for systematic evaluation is in place.**

**Criterion:** All aspects of administration and clinic operation are evaluated on a regular basis.

Suggested ways to demonstrate criterion is met:
Records and documents reveal on-going and systematic evaluation of the clinic operations and patient outcomes, if appropriate.
PERSONNEL GUIDELINES

7. Providers are credentialed and licensed as required by law; operate within the ethical standards and scopes of practice of their profession; and maintain professional competence.

Criterion: Job descriptions that include information regarding required licensing/credentialing are available in clinic records and are utilized for the recruitment of professional staff.

Suggested ways to demonstrate criterion is met:
- Job descriptions exist in clinic manuals for all individuals working in the clinic.
- Job descriptions include licensing and credentialing criteria when appropriate.
- Job descriptions are used in recruitment of professional staff.

Criterion: Background checks are completed on all clinic personnel and volunteers prior to the time they are hired or volunteer in the clinic.

Suggested ways to demonstrate criterion is met:
- Clinic records indicate that a process for assuring staff and volunteer background checks is implemented in clinic operation.

Criterion: Periodic review of credentials is done to ensure ongoing compliance.

Suggested ways to demonstrate criterion is met:
- Clinic manuals and records demonstrate a systematic process for review of credentials that is consistently implemented at least every two years.

Criterion: Systematic evaluation includes criteria related to maintenance of ethical standards, performance within scope of practice and maintenance of professional competence.

Suggested ways to demonstrate criterion is met:
- Clinic manuals describe a process by which ethical standards and professional competence is reviewed.
- Clinic records demonstrate that professional performance and competence are evaluated at least every two years.

8. Collaborative relationships among staff, volunteers and providers promote and atmosphere of mutual respect for all.
Criterion: All individuals (staff, volunteers, providers and patients) are treated with dignity.

Suggested ways to demonstrate criterion is met:
The mission, vision and values of the clinic support collaborative relationships. Staff and volunteer orientation includes emphasis on building a culture of respect.

Criterion: Open communication exists among all clinic personnel.

Suggested ways to demonstrate criterion is met:
Results of annual surveys completed by volunteers demonstrate 90% believe that a culture of respect exists in the clinic.

Criterion: Any disrespectful or offensive behavior is reported to clinic management for appropriate resolution.

Suggested ways to demonstrate criterion is met:
Clinic records are maintained regarding any reports of disrespectful or offensive behavior and the resolution of the incident.

9. All staff and volunteers are aware of and adhere to patient's rights.

Criterion: All personnel receive in-person orientation and printed materials regarding HIPAA regulations prior to working in the clinic and are expected to follow established guidelines regarding confidentiality of information.

Suggested ways to demonstrate criterion is met:
Clinic manuals include a process for providing orientation to new personnel to the rights and responsibilities of patients.

Criterion: Corrective action is taken when patients' privacy rights have been violated.

Suggested ways to demonstrate criterion is met:
Policies exist that describe action to be taken when patients' privacy rights have been violated.

Records indicate that appropriate action was taken when privacy rights were not followed.
10. The clinic consistently communicates to the public what services are offered, and what services are not, so that the community can understand the scope of care within the clinic.

**Criterion:** All public information about the clinic and its operation are forthright and include any limitation of services.

Suggested ways to demonstrate criterion is met:
- Brochures, websites, and other public information describe scope and limitations of clinic services, as well as any patient eligibility criteria.

**Criterion:** When possible, appropriate referrals to needed services are facilitated by clinic personnel.

Suggested ways to demonstrate criterion is met:
- Clinic records indicate that clinic personnel and volunteers have received training regarding community resources and how to access them.

**Criterion:** The clinic maintains a current list of community referral resources.

Suggested ways to demonstrate criterion is met:
- The community referral resources list is verified and updated as necessary and at least annually.

11. **Care is individualized to meet and honor the needs of the patients who seek service**

**Criterion:** Individualized patient care is provided with compassion and respect.

Suggested ways to demonstrate criterion is met:
- Patient service evaluations indicate a satisfaction rate of 80% or greater.

**Criterion:** Within the scope of practice and capacity of the clinic, care is provided to all who qualify for services and records are established.

Suggested ways to demonstrate criterion is met:
- Records are established for all individuals who receive direct healthcare services in the clinic.

**Criterion:** No patient is turned away on the basis of race, color, national origin, religion, gender, age, disability, marital status, sexual orientation or other protected status.
Suggested ways to demonstrate criterion is met:
Patient demographic reports document service to a patient population that is representative of the community at large.

**Criterion:** Policies of non-discrimination have been adopted.

Suggested ways to demonstrate criterion is met:
Policies of non-discrimination are displayed and published in clinic information and are posted on the website and brochures.

**12:** *The best practices and clinical protocols available among free and charitable clinics are reviewed regularly and implemented when possible and appropriate.*

**Criterion:** To the extent possible, protocols for clinic operation include best practices.

Suggested ways to demonstrate criterion is met:
Clinic manuals, policies, and procedures are available and support evidence-based practice.

Quality assurance committee minutes indicate review of best practices and clinic protocols.

**Criterion:** Clinic members participate in a culture of mutual support.

Suggested ways to demonstrate criterion is met:
Copies of correspondence with clinics indicate sharing of practices and protocols, as well as experiences and insights to help other clinics.
13. **Patient's rights are observed in all aspects of care.**

**Criterion:** Patients are informed about care received, referrals, and options for care and discharge plans and may participate in decisions regarding treatment choices.

Suggested ways to demonstrate criterion is met:
- Clinic records demonstrate patient received information about care provided.
- Clinic records demonstrate patient involvement in decisions regarding care and treatment.

**Criterion:** When possible, interpreters or interpretive devices are available if a patient is uncomfortable communicating in English or is hearing impaired.

Suggested ways to demonstrate criterion is met:
- Review of patient records indicates the use of interpreters or interpretive devices.

**Criterion:** At the patient's invitation, patients are allowed to have a family member or friend present at the time of treatment.

Suggested ways to demonstrate criterion is met:
- Records/Observations indicate family or friends may accompany patients during treatment.

**Criterion:** Information is available to patients about rules that affect them or their treatment.

Suggested ways to demonstrate criterion is met:
- Review of clinic information and brochures verify inclusion of information about rules that affect patients and their treatment.
CONTINUITY OF CARE

14. Systems are implemented to enable patients and/or their families to follow discharge instructions.

**Criterion:** Forms that include self-care instructions have been developed and are given to patients upon discharge from the clinic.

Suggested ways to demonstrate criterion is met:
   Patient records include forms used for discharge instructions.

**Criterion:** Instructions are reviewed with patients prior to discharge.

Suggested ways to demonstrate criterion is met:
   Patient records indicate that discharge instructions were reviewed with patients.
MEDICAL RECORDS

15. **Confidential patient information is appropriately transferred to other healthcare providers to ensure continuity of care for patients.**

   **Criterion:** Forms and methods of transmission have been developed and implemented to provide for the confidential release of medical records.

   Suggested ways to demonstrate criterion is met:
   Processes for releasing records are outlined in clinic guidelines and policies.

   **Criterion:** No patient records are released without the patient's written consent.

   Suggested ways to demonstrate criterion is met:
   A copy of the patient's written consent for the release of medical records is found in the patient's file for all instances where records have been released.

   **Criterion:** Requests for release of medical information are honored in a timely manner in accordance with state and federal patient privacy laws.

   Suggested ways to demonstrate criterion is met:
   In keeping with legal requirements of state and federal guidelines, review of records indicates that requests for medical information are honored promptly.

   **Criterion:** All medical records which relate directly to the care and treatment of a patient are retained and preserved for a period of no less than ten years following the most recent discharge of the patient, except the records of minors, which shall be retained and preserved for a period of no less than three years following attainment of the age of eighteen years, or ten years following such discharge, whichever is longer.

   Suggested ways to demonstrate criterion is met:
   Policies exist for retention of patient records in accordance with state regulations.

   The policy includes a documented plan for retention of records should the clinic cease operation.
16. **Strong lines of communication exist with other healthcare entities to coordinate care for patients.**

**Criterion:** Open and professional communications are maintained with healthcare organizations in the community.

Suggested ways to demonstrate criterion is met:
- Records indicate meetings with representatives of other healthcare entities with resulting Memoranda of Understanding (MOU).

MOUs are updated annually to meet identified needs.

**Criterion:** Community coalitions that work with health and other services are identified and clinic representatives attend meetings of these groups.

Suggested ways to demonstrate criterion is met:
- Records indicate participation of a free clinic representative when such coalitions exist.
DRUG DISTRIBUTION

17. The clinic has established policies that are in conformance with federal, state, and local laws that will ensure safe and effective distribution and storage of drugs.

**Criterion:** All pharmaceutical procedures are supervised and managed by the medical Director.

Suggested ways to demonstrate criterion is met:
Records indicate regular review by the medical director of the physical pharmaceutical area, inventory and distribution logs.

**Criterion:** Required licensure is maintained by the clinic per state, federal and local laws.

Suggested ways to demonstrate criterion is met:
Documentation of required licensure/permits is posted per regulations

**Criterion:** A list of drugs available for use in the clinic shall be maintained in the clinic formulary.

Suggested ways to demonstrate criterion is met:
Records indicate formulary and inventory lists match.

**Criterion:** Storage of drugs is in compliance with state, federal and local regulations.

Suggested ways to demonstrate criterion is met:
Records indicate that inventory and temperature logs are completed per policy and the area is secured with limited access to designated personnel only per policy.

**Criterion:** Distribution policies and procedures are in compliance with state, federal and local regulations.

Suggested ways to demonstrate criterion is met:
Quarterly audit records show 100% compliance to policies and procedures.

**Criterion:** Disposal of expired or non-inventory drugs is completed on a timely basis and in accordance with state, federal and local regulations.

Suggested ways to demonstrate criterion is met:
Quarterly audit records show 100% compliance to policies and procedures.
18. Resources will be used cost effectively to benefit the patients served and to promote safety and satisfaction in patient care.

**Criterion:** Systems are implemented to ensure the safe storage, regular inventory, and appropriate disposal of supplies, equipment and medication.

Suggested ways to demonstrate criterion is met:
- Clinic policies provide guidelines for safe storage and disposal of supplies, equipment and medication.

**Criterion:** Steps are taken to ensure that supplies and materials are not wasted or pilfered.

Suggested ways to demonstrate criterion is met:
- Records are maintained to assure tracking of supplies and materials in a way that discourages wasting or pilfering.

**Criterion:** Consideration is given to value and efficacy when making purchases of patient care supplies.

Suggested ways to demonstrate criterion is met:
- Volunteers are oriented to the importance of appropriate use of supplies and materials.

**Criterion:** Duplication of equipment is avoided when possible.

Suggested ways to demonstrate criterion is met:
- A statement of justification is on file for purchase or duplication of durable equipment items in excess of $1,000.
EVALUATION OF CARE

19. Free clinics adopt and maintain a process to ensure periodic evaluation of services with emphasis on quality of care.

**Criterion:** Standards and a formal plan for evaluation of services and personnel are in place.

Suggested ways to demonstrate criterion is met:
- Clinic records and annual reports demonstrate evaluation of services and personnel.

**Criterion:** Data from the evaluation process is analyzed and used to improve clinic operations.

Suggested ways to demonstrate criterion is met:
- Records indicate review of the evaluation process and identification of any areas of weakness.

**Criterion:** In instances where evaluations demonstrate weaknesses, remedial action is taken.

Suggested ways to demonstrate criterion is met:
- Corrective actions to improve care are incorporated into the clinic's formal plan for evaluation and are implemented when necessary.
ENVIRONMENT

20. Systems are implemented to ensure a safe environment for patients and personnel.

**Criterion:** Policies, procedures and protocols exist to assure a safe environment in the clinic, including natural and man-made disasters.

Suggested ways to demonstrate criterion is met:
- Clinic files contain required policies, procedures and protocols that demonstrate implementation.
- A plan exists for efficient exit of buildings in the event of a disaster.

**Criterion:** Policies and procedures that ensure a safe environment are reviewed by the Board at least every two years.

Suggested ways to demonstrate criterion is met:
- Board minutes reflect review of policies and procedures guiding a safe environment.

**Criterion:** Clinic orientation processes includes information about how threats to the environment and disruptive behaviors are managed.

Suggested ways to demonstrate criterion is met:
- Review of staff and volunteer orientation processes indicate that topics related to maintaining a safe environment are included.
- Interviews with personnel demonstrate understanding of the steps taken to manage threats to the environment and disruptive behavior.

21. Policies and a process exists for implementation of Universal Precautions for WISHA, CDC and OSHA requirements.

**Criterion:** Orientation of new clinic personnel includes information regarding WISHA, CDC, and OSHA standards.

Suggested ways to demonstrate criterion is met:
- Review of orientation materials and check lists demonstrate information regarding WISHA, CDC and OSHA standards are included.

**Criterion:** All clinic personnel follow WISHA, CDC and OSHA regulations during the time they are in the clinic.
Suggested ways to demonstrate criterion is met:
   Observational surveillance demonstrates and documents adherence to WIISHA, CDC and OSHA regulations.

**Criterion:** Clinic personnel observed in violation of WIISHA, CDC and OSHA regulations are counseled regarding best practices.

Suggested ways to demonstrate criterion is met:
   Incident reports are reviewed to determine adherence to WIISHA, CDC and OSHA regulation.

   Records indicate that in instances where violation of WIISHA, CDC and OSHA regulations has occurred action is taken to correct behaviors.
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**Drug Distribution**

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**Resources**

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**Evaluation of Care**

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**Environment**

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