Practice Management:
Considerations & Useful Policies

Where to Start:

BHSD Provider Toolkit (PDF)
BHSD Billing and Policy Manual (referred to as the B&P Manual) (PDF)
BHSD Billing and Policy Appendices (PDF)
New Mexico Administrative Code (NMAC) (website)

TIPS:

- ☐ Define Key Roles and/or Positions based on the six Practice Management Components Human Resources, Finance, Operations, Information Technology, Compliance, and Marketing (e.g., who is responsible for what aspects of practice management, etc.)
- ☐ Create a practice management plan to include "good habits" or a checklist (i.e.,for your specific practice, available resources, and roles/positions.)
- ☐ Make the organization's financial health a priority (i.e., hire external support, if needed).
- ☐ Ensure all necessary policies are developed, communicated, and accessible to staff.

Practice Management Roles:

The same person may be responsible for multiple roles. It's important to define each role, duties, and who is responsible for them. **Roles that support Effective Practice Management may include, but are not limited to:**

- ☐ Executive Director/CEO
- ☐ Clinical Director/Supervisor
- ☐ Compliance Officer
- ☐ Quality Improvement Manager
- ☐ Bookkeeper
- ☐ CFO
- ☐ Billing Staff (submitting clean claims, working EOBs and denials)

Components of Practice Management:

Human Resources

Staff/Office Safety -

- ☐ Are you properly insured for on site incidents?
- ☐ What should a staff member do if there is a safety concern in the treatment room? Reception area? Parking lot/office entrance?
- ☐ How is your office physically set up to promote safety and trauma-informed care? (ex. chair/desk placement, exit routes, visibility/lighting, sensory stimuli like color, scent, sounds)
- ☐ Do you train your staff on community safety practices?
- ☐ Outline agency protocol for staff safety during community and/or home visits
- ☐ Define the chain of command - who needs to be called when? Who needs to be informed and when?

Cultural Competency

- ☐ Non-discrimination policy (B&P Manual)
- ☐ Interpretation services - do you serve a multilingual community? How are you ensuring access to interpretation and translation of important documents?
- ☐ Culturally informed referral lists to other providers in the area who offer multilingual/culturally informed services

- ☐ Support for Bilingual/Bicultural staff - are you paying them for translation or interpretation work they do for the agency outside of their direct service clients?
- ☐ Is your building ADA compliant/accessible?
- ☐ Do you know where to access ASL (American Sign Language) interpreters?
- ☐ Are client facing forms compliant with C.L.A.S standards?

Onboarding and Training

- ☐ Provide onboarding orientation that includes a review of the organizations mission, vision, values, expectations, and policies.
- ☐ Do new hires need to go through background checks, fingerprinting, etc. before they start?
- ☐ Onboarding checklist - what needs to be reviewed and completed the first day? First week? First month? (this might include: Office access, access to phone/email/EMR systems, review of policies and procedures, direct deposit info, meeting with supervisor, etc.)
- ☐ Who is responsible for ensuring new staff have completed their onboarding tasks?
- ☐ Do you provide CE approved training for your providers? If not, how do you communicate expectations and/or opportunities regarding continuing education?
- ☐ If you offer certain programs like CCSS and Crisis Intervention services that require initial and ongoing training, how are you tracking those hours to ensure staff is in compliance?

Conflict Resolution/Grievances

- ☐ Who can clients contact if they have a concern or grievance about a provider?
- ☐ What is your agency’s process for addressing grievances raised by clients?
- ☐ What is your agency’s process for addressing grievances raised by staff about a colleague?
- ☐ How are leadership held accountable to staff and clients? What is the role of the Board of Directors or Board of Advisors in such situations, if applicable?

Performance Review

- ☐ How often do you conduct them?
- ☐ Are there standard metrics? Professional development goals? DEI goals?
- ☐ Is there a different review process for leadership vs. staff? 360 feedback?
- ☐ Do you offer raises? Bonuses?
- ☐ How do you navigate corrective feedback or poor performance outcomes?

Employee Handbook: at a minimum includes:

Background about the organization
- ☐ Mission, Vision, Values
- ☐ A note about the culture of the organization

Attendance expectations
- ☐ Is remote work allowed?
- ☐ For community-based staff, how often are they expected to check in with the office?
- ☐ Hours of operation? Which staff have building access?

Billing and/or Productivity quotas
- ☐ Is there a weekly minimum?
- ☐ Are there bonuses offered?
- ☐ What happens if a clinician is not meeting their quota?

Leave policies
- ☐ PTO, Sick Leave, FMLA, etc.

Coverage expectations when out of office
- ☐ Who needs to be advised?
- ☐ What approvals are required?
- ☐ Is there a standard out of office message for email and voicemail?

Supervision policy
- ☐ How often should staff be meeting with their supervisor?
- ☐ Is clinical supervision offered? If not, are you able to reimburse clinical supervision costs to staff in total or in part?
- ☐ Are your clinical supervisors approved to supervise different licensure types?
- ☐ What types of grievances or issues should be brought to a supervisor's attention?

Dress Code
- ☐ Are there things that would be safety hazards if worn/not worn in your service environment? Is there a uniform?

Communication policies
- ☐ What can/can't be shared on social media? What can/can't be shared via email, text, voicemail, fax?
- ☐ Will they be expected to use their personal phone/computer or will that equipment be provided?
- ☐ Chain of command

Termination policy
- ☐ At will employees vs. Contractors
- ☐ How much notice is expected if initiated by employee?
- ☐ Under what circumstances would the agency terminate an employee?

Job Descriptions/Role clarity
- ☐ What are the key roles/positions at the agency and what are they responsible for?
- ☐ This might include key leadership roles, administrative personnel, billing, quality assurance, etc.

Useful Employee Handbook section additions:
- Non-retaliation Policy
- Workplace Safety
- Non Harassment Policy
- Equity, Diversity, and Inclusion
- Non-compete policy
- Staff mental wellbeing
- FMLA

Finance

Grant Management -

- [ ] Outline agency's policy for managing grants including its' program requirements and budget
- [ ] Outline agency's approach to grant project and task management

Audits/Budget Reviews

- [ ] Certain programs and modalities have compliance criteria that may be audited - how are you tracking that data? - The BHSD Billing and Policy Appendices include resources for some of these modalities
- [ ] Financial Audits - how often? What is your filing and bookkeeping practice?
- [ ] Who is responsible for assisting/accompanying auditors? Who is responsible for filing and managing data?
- [ ] HIPAA compliance for PII and PHI

Billing & Finance -

- [ ] What are your primary income/funding sources?
- [ ] Do you have an annual budget?
- [ ] Do you understand your fixed expenses?
- [ ] How many staff can you afford? What is the minimum number of reimbursements you would need to manage expenses? Do you have access to grants/additional funding to off-set non-billable work tasks?
- [ ] What is the policy for the expected time frame for submitting progress notes from time of service (standard practice is no later than 3-5 days)?
  - [ ] How will this policy be encouraged/enforced?
  - [ ] How do your encouragement/enforcement policies align with your mission/vision/values?
- [ ] For smaller agencies/practices - who is responsible for handling billing? Denials? EOBS? Reimbursement rate negotiation?

Good Habits for Finance:

- Pull monthly financial reports (e.g., billing and revenue aging reports, billing status, denial report, profit and loss statement, balance sheet, bank statements, etc.)
- Review financial reports every quarter with bookkeeper and/or CPA
- Annual review of chart of accounts with CPA
- Build cash reserves that would cover 3-6 months of expenses/payroll
- Track non-billable time spent on tasks like case management, scheduling, administrative/paperwork time, etc. - this information can be useful for renegotiating reimbursement rates, identifying grant opportunities, and properly budgeting time and expectations for optimal morale and performance.

Questions to consider:

- Is your organization bringing in more money than is going out in expenses?
  - How do you know? Net Income (NI) on P&L ("Income Statement") for period (calendar year, fiscal year, month, etc..)?
  - If NI negative: than hard time meeting expense obligations including payroll, incur debt, tap into reserves
  - If NI positive: more $ in cash reserves or to invest in staff, equipment, client assistance
- Do you have cash reserves to cover expenses for x months or x payrolls?
  - Should consider total payroll: salary, benefits and taxes
  - How do you know? Balance Sheet for current assets; P&L to determine monthly expenses
- How much money is owed to you, but you have not received yet?
  - A/R days – days to bill (within provider's control), days to pay
- Goal: Get the money as fast as you can.
- Balance on grants, need to be aware of expiration dates for grants

Things to google/ watch on youtube:

- Intro to Financial Statements
- Intro to Income Statements
- Intro to Balance Sheet
- Accounts Receivable

Operations

Crisis Intervention & Safety Planning (for client care) -

- [ ] Outline your agency's protocol and the role of each staff member.
- [ ] Define the situation - How do staff know when a client is in crisis?
- [ ] Define the roles - What is the first thing your front office staff need to do, the clinician, the supervisor, etc?
- [ ] Define the chain of command - Who needs to be called and when?

Scheduling/Rescheduling -

- [ ] Define roles - who is in charge of scheduling clients?
- [ ] Define boundaries for clients and staff. How many times can someone reschedule? Is there a fee for no-shows or late cancellations? Is there a limit to how many times a client can no-show? What happens if they meet that limit?
- [ ] How are no-shows and cancellations documented?

Communication

- [ ] How are management decisions made?
- [ ] How are management decisions communicated to staff?
- [ ] Do you hold regular staff meetings? Leadership/management team meetings? How often?

        - [ ] Running effective meetings
        - [ ] Accountability - task list, project plan
    - [ ] How is feedback elicited from staff?

Program Review/Evaluation

- [ ] What are you measuring to demonstrate success and/or effectiveness of your program(s) and staffing?
- [ ] How often are you collecting data/metrics? How often are you reviewing and analyzing it?
- [ ] The [BHSD Billing and Policy Appendices] include a General Organization Index that may be helpful (see Appendix W) in BH Appendices

Good Habits for Operations:

- Updating Roster every 6 months (BHSD Billing and Policy Manual p. 18)
- Quarterly or bi-annual review of policies and procedures with staff, especially if your agency experiences high turn-over.
    - This helps ensure that everyone is on the same page
- Have regular staff meetings
    - Quarterly - report high level items (goal: support positive workplace culture, inform staff, keep avenues of communication open)
    - Annual meeting - focus on strategic planning and goals for the coming year
    - Accountability/Check in meetings (may be held 1:1 with specific staff who have assigned tasks/projects. May be held in a group format using task list or other project management tools.
- Develop a strategic plan at least once every 3 years
- Make reviewing the strategic plan and goals a routine process - at least twice a year. Are you on track?
- Use project management tools like a project plan or task list to manage programs, grants, projects - train staff to understand how to use these tools.

Information Technology

CyberSecurity

- [ ] Is your electronic medical record system secure?
- [ ] Is your billing system secure?
- [ ] Does your insurance cover breaches/hacks/etc. for the electronic systems/technology?

Compliance

Reporting Requirements -

- ☐ Critical Incidents (see Billing and Policy Manual p.24 and Appendix I)
- ☐ Mandated Reporting of Child Abuse and Neglect
- ☐ Mandated Reporting of Adult Abuse and Neglect

Telehealth/Telemedicine -

- ☐ Is your Telehealth format HIPAA compliant?
- ☐ Does your provider and/or general insurance cover breaches/hacks/etc. for the electronic systems/technology you use for telehealth?
- ☐ How are you monitoring and supervising staff providing telehealth?
- ☐ For billing compliance see the B&P Manual and NMAC.

General HIPAA Compliance

- ☐ Is your electronic medical record system HIPAA compliant?
- ☐ Does your provider and/or general insurance cover breaches/hacks/etc. for the electronic systems/technology you use for your electronic medical records?
- ☐ How are you monitoring and supervising staff compliance with regulations for HIPAA, PHI, and PII?
- ☐ Do you have HIPAA compliance training and related policy?
- ☐ In the event of a breach does your team know what to do?

Marketing

Basic Marketing & Networking

- ☐ Do you know what resources are available to your clients in your area?
- ☐ Does your agency have Memorandum of Understanding (MOU) with any local services that allow you to expedite referrals of clients to those services?
- ☐ Does your agency have a website that clearly defines the services provided, how to access them, and the cost/insurance?
- ☐ Does your agency regularly post on social media such as LinkedIn, Instagram, or other platform?