

Board Meeting
January 18, 2018

DELEGATE AUTHORITY TO APPROVE POLICIES OF THE UNIVERSITY OF
ILLINOIS HOSPITAL AND CLINICS

Action: Delegate Authority to Approve Policies of the University of Illinois
Hospital and Clinics

Funding: No New Funding Required.

This Board item relates to the requirement by the accrediting entity, the Joint Commission, of Board involvement in the approval of policies for the University of Illinois Hospital and Clinics (“UIH”).

Background

The Joint Commission is the principal accrediting body for UIH. The Joint Commission is a private sector, U.S.-based, not-for-profit organization that operates accreditation programs for a fee to subscriber hospitals and other healthcare organizations. Across the U.S., the Joint Commission accredits and certifies nearly 21,000 health care organizations and programs. Benefits of being an accredited hospital include:

- organizing and strengthening patient safety efforts;
- improvements in risk management and risk reduction;

- periodic on-site independent reviews, measured against established accreditation standards;
- recognition by insurers and other third-party payors; and,
- “deemed” status for purposes of Medicare and Medicaid reimbursement.

In regard to the last benefit, for a hospital to participate in and receive payment from the Medicare and Medicaid programs it must meet detailed eligibility requirements for program participation, including a certification of compliance with the conditions of participation as set forth in federal regulations. Since 1965, hospitals with Joint Commission accreditation have been “deemed” to meet the Medicare hospitals’ conditions of participation.

As described below, among the Joint Commission’s accreditation standards are requirements related to a hospital’s leadership structure and the “governing body’s” responsibilities and required actions for the conduct of the hospital. In the case of UIH, the governing body is the Board of Trustees (“Board”). UIH demonstrates compliance with these accreditation standards through enactment of various policies, including three that are currently recommended for approval by the Board as the governing body; they are:

- Policy RI 1.01: Patient Complaint and Grievance Management;
- Policy LD 1.04: Governing Body and Management; and
- Policy LD 4.08: Conflict Management by Senior Leadership.

These UIH policies are reviewed and approved by UIH's "Hospital Management Policy and Procedure Committee." To demonstrate compliance with accreditation standards, the three policies listed above are also reviewed and approved by the UIH Chief Executive Officer ("CEO") and/or the University of Illinois at Chicago Vice Chancellor for Health Affairs ("VCHA"). As the three policies relate to the responsibilities of the "governing body" of UIH, once approved by the CEO and/or VCHA, the three policies require approval by the Board. The following summarizes the scope and purpose of these three policies.

Policy RI 1.01 Patient Complaint and Grievance Management establishes a mechanism for managing patient complaints and grievances regarding care and services received at UIH. The Joint Commission requires that the hospital establish a complaint resolution process, and that the governing body be responsible for the effective operation of such process unless it delegates this responsibility in writing to a complaint resolution committee. [Source: Joint Commission Accreditation Standard RI 01.07.01, EP#1]. This policy currently requires approval by the CEO and the Board.

Policy LD 1.04 Governing Body and Management sets forth the responsibilities and accountability of the Board, as the governing body of UIH, for the operation, safety and quality of care, treatment, and services of UIH. The Joint Commission standards require that the governing body be ultimately accountable and assume full legal responsibility for the operation, safety and quality of care, treatment, and services of the hospital. The Joint Commission also requires that the governing body define in writing its responsibilities. [Source: Joint Commission Accreditation Standard

LD 01.03.01, EP#1, EP#12]. This policy currently requires approval by the CEO, the VCHA, and the Board.

Policy LD 4.08 Conflict Management by Senior Leadership establishes a procedure for conflict resolution when there is no mutual agreement to be reached in decision making at the senior leadership level while ensuring that patient safety and quality of care are uncompromised. The Joint Commission requires the governing body, senior managers, and leaders of the organized medical staff to work together to define in writing and address conflicts of interest involving leaders that could affect safety and quality of care, treatment, and services. [Source: Joint Commission Accreditation Standard LD 02.02.01, EP#1]. This policy currently requires approval by the CEO, the VCHA, the President of the UIH Medical Staff, and the Board.

Delegating the final approval to two voting members of the University Health System Committee (“UHS Committee”) would allow a more nimble approach by members of the Board with particular familiarity with healthcare issues. The members of the UHS Committee are familiar with hospital operations and will be more readily available to review and act in timely fashion on recommended changes to these policies, which occur periodically. In addition, this delegation mirrors a similar delegation by the Board in 2010 concerning UIH medical staff credentialing and privileging decisions. Accordingly, it is requested that the Board approve and confirm delegating the authority to approve the UIH policies described above to any two voting members of the Board’s UHS Committee.

It is therefore recommended that the Board approve delegating such authority to any two voting members of the UHS Committee.

Action Requested

The Chancellor, University of Illinois at Chicago and Vice President, University of Illinois and the Vice Chancellor for Health Affairs, recommend that the Board authorize any two voting members of the Board who also are members of the UHS Committee to act on recommendations from the CEO and the VCHA, or as may otherwise be permitted or contemplated, to approve the following UIH policies:

- Policy RI 1.01: Patient Complaint and Grievance Management,
- Policy LD 1.04: Governing Body and Management, and
- Policy LD 4.08: Conflict Management by Senior Leadership.

The Board action recommended in this item complies in all material respects with applicable State and federal laws, University of Illinois *Statutes, the General Rules Concerning University Organizations and Procedures*, and Board of Trustees policies and directives.

The President of the University concurs.