Writing Compliant Policies and Procedures for Social Adult Day Care (SADC) Programs

Presenter: Yvonne Ward,   New York State Adult Day Services Association

NYSADSA
New York State Adult Day Services Association Inc.

Welcome & Objectives

- Understand the regulatory expectations for SADC policy and procedure manuals

- Learn how to develop and maintain compliant documentation

- Review document control, governance, and approval workflows

- Emphasize the legal importance of written policies and procedures

NYSADSA
New York State Adult Day Services Association Inc.

Regulatory Framework

- 9 NYCRR §6654.20(d)(2)(i)(a-i)
- NYSOFA Standards (for SADS)
- HCBS Final Rule Requirements
- NYS Certification Requirements

NYSADSA
New York State Adult Day Services Association Inc.

Policies & Procedures Are Legal Documents

- Serve as the formal statement of organizational standards and responsibilities

- Are enforceable in audits, investigations, or litigation

- Must reflect current regulatory expectations

- Signature of approval by governing body confirms organizational accountability

Core Component – Table of Contents

- Provides a roadmap for staff and auditors

- Must be current and updated with each revision

- Organize policies by topic or department for easy navigation

NYSADSA
New York State Adult Day Services Association Inc.

Core Component – Policy Statement
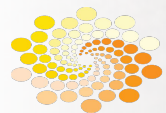
CLEARLY DEFINE THE PURPOSE AND INTENT OF THE POLICY

SPECIFY THE SCOPE (WHO AND WHAT IT APPLIES TO)

CITE THE AUTHORITY FOR THE POLICY (REGULATION, STANDARD, ETC.)

Core Component – Procedures

- Step-by-step instructions to operationalize the policy

- Should be clear, consistent, and actionable

- Use job titles, not names, for responsible parties

Core Component – References

- Include relevant regulations (e.g., NYCRR, or payor source policies)

- List related internal forms or tools

- Helps demonstrate linkage to compliance expectations

NYSADSA
New York State Adult Day Services Association Inc.
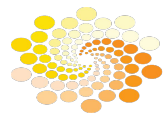
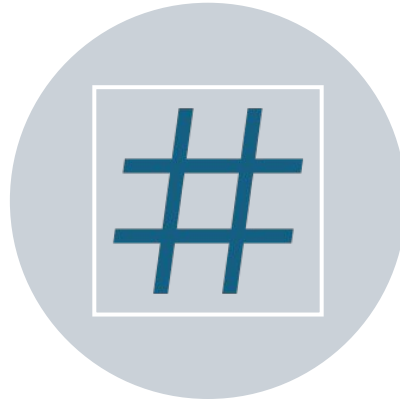# Core Component – Responsible Party

- Identify who is accountable for implementation and oversight

- Should align with job roles in the organizational chart

- Use this section to clarify roles in audits or investigations

Core Component – Approval and Revision Dates

SHOW WHEN THE POLICY WAS CREATED, LAST REVIEWED, OR REVISED

INCLUDE VERSION NUMBER AND REVISION HISTORY

INCLUDE SIGNATURE OF GOVERNING AUTHORITY

NYSADSA
New York State Adult Day Services Association Inc.

Required SADC Policy Topics

(Referencing NYCRR §6654.20(d)(2)) additional policies and procedures may be required for payor sources

- Member eligibility
- Admission/discharge criteria
- Person-Centered Service Planning (PCSP)
- Member rights and responsibilities
- Staffing plan and training
- Service delivery (nutrition, activities, transportation)
- Emergency preparedness
- Member records and confidentiality
- Self-evaluation and quality assurance

Drafting a Compliant Policy

- Use clear, concise, and objective language

- Include responsible positions, not individuals

- Specify frequency of required tasks

- Avoid vague terms (e.g., "as needed," "often")

- Include cross-references to forms or tools used

Document Control Practices

- Unique policy ID number

- Version number and revision history

- Date created / revised / next review

- Approval signature by governing authority (e.g., Board, Program Director)

- Controlled access to final versions

NYSADSA
New York State Adult Day Services Association Inc.

Governance & Approval Process

- Draft by content expert or compliance lead
- Internal review (clinical, operations, compliance)
- Approval by Governing Body (Board or authorized designee)
- Retain signed approval page in Policy Binder

Updating & Revising Policies

- Review annually, or sooner if:
  - Regulation changes
  - Identified during audit/remediation
  - Program modifications
- Document rationale for revisions
- Archive previous versions with retirement date

NYSADSA
New York State Adult Day Services Association Inc.

Staff Training & Accessibility

Train	Train staff on initial onboarding and annually thereafter
Ensure	Ensure staff know where to find policies
Track	Track training completion for audit purposes

NYSADSA
New York State Adult Day Services Association Inc.

Supporting Tools – Overview

- Policy template (with document control section)
- Tracking log for policy updates
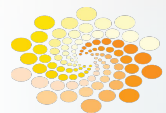- Approval form
- Staff attestation log

Policy Template (with Document Control)

- Standard format ensures consistency across all policies

- Includes:
  - Policy ID and title
  - Version number, creation/revision dates
  - Responsible department
  - Approval section for signatures

- Facilitates audit-readiness and compliance traceability

Tracking Log for Policy Updates

- Maintains an up-to-date record of all policies

- Tracks:
  - Last review/revision dates
  - Status (active/draft/retired)
  - Assigned reviewer

- Helps avoid outdated or overlooked documents

Approval Form

- Official record of policy endorsement

- Captures:
  - Policy title and ID
  - Approver names, titles, and signatures
  - Date of approval

- Required for compliance documentation and board governance

Staff Attestation Log

- Documents that staff:
  - Received the policy
  - Understand their responsibilities
  - Completed training (if required)
- Ensures accountability and defensibility in audits or incidents

NYSADSA
New York State Adult Day Services Association Inc.

Compliance Pitfalls to Avoid

- Outdated or missing policies
- No record of approval or revision
- Untrained staff
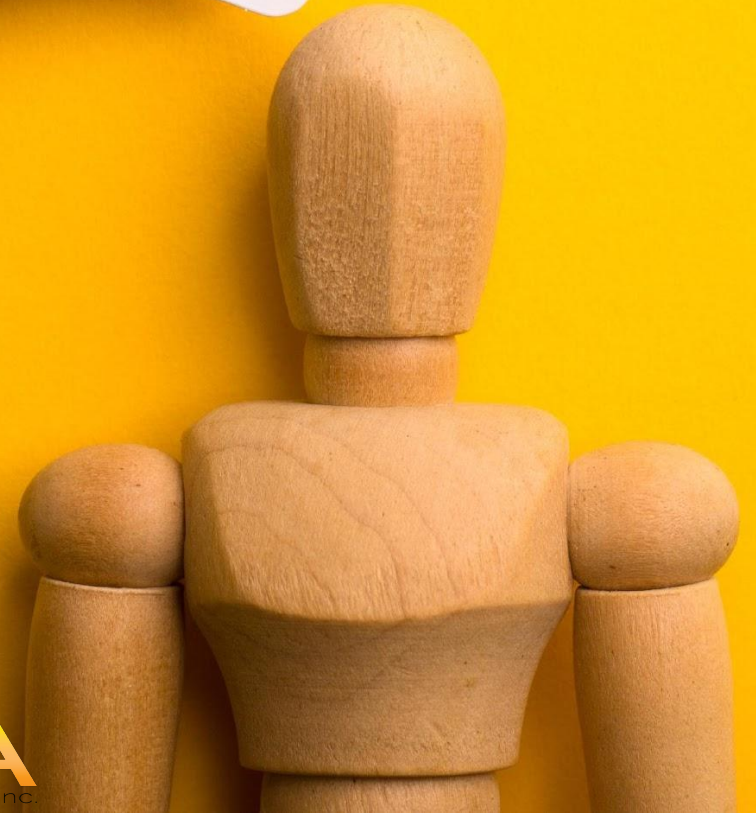- Non-alignment with actual practices
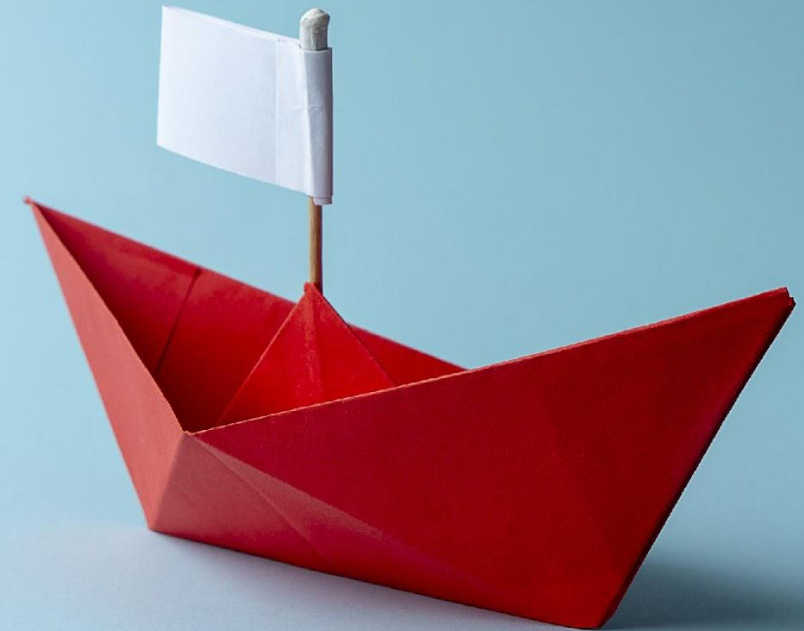
Summary & Next Steps

- Policies guide daily operations and ensure regulatory compliance
- Treat policies as living documents, not static binders
- Engage leadership in oversight and approval
- Build a routine calendar for reviews and updates

Questions & Discussion

- Open Q&A
- Invite scenarios or challenges
- Share resource links and templates if applicable

NYSADSA
New York State Adult Day Services Association Inc.

Thank You!

NYSADSA
New York State Adult Day Services Association Inc.