

Shadowfax

Title	Policy Framework Policy
Policy Number	ORG.1000.000.000
Policy Owner	Shadowfax Compliance Committee
Approved By	Shadowfax Board of Directors 7-1-2021
Origin Date	05/23/2021
Revision Date	
Effective Date	July 1, 2021
Next Review Date	July 2022
Associated Policies	All Shadowfax Policies
Associated Procedures	All Shadowfax Procedures
Associated Forms	All Shadowfax Forms

I. POLICY STATEMENT

Shadowfax recognizes our responsibility to good corporate governance and operations of our organization and is establishing a system for how Shadowfax's policies and associated documents will be created and managed.

II. PURPOSE

This policy is intended to provide a method to create and maintain consistent and well-developed policies and associated documents that support Shadowfax regulatory and business needs.

III. SCOPE

This policy applies to the development and administration of all Shadowfax programs. No Shadowfax policies and associated documents may be developed or implemented outside of this framework.

IV. GENERAL

This policy is based on Shadowfax organizational standards.

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V. POLICY

Administration

Policy Committee: A cross-program committee responsible for ensuring policies are developed and maintained within the defined framework and naming convention. The committee will meet quarterly, at a minimum, and more frequently if requested by the Compliance Committee, Policy Committee, or Bulletin Sub-Committee. The committee will have no less than three members who are determined by the Compliance Committee, membership is reviewed annually. The Policy Committee will elect a Chairperson, which may be a rotating position that changes annually or as the Policy Committee decides. The Chairperson is responsible for scheduling and facilitating committee meetings, recording each meeting and/or creating minutes, posting meeting recordings/minutes in a site accessible to all Committee members, communicating action items from the meetings to responsible parties and following up to ensure action items are completed according to plan.

Policy Committee duties include:

- Reviewing policy revision schedules to ensure policies are being reviewed according to each policy's revision date, and not to exceed 18 months.
- Reviewing proposed new policies to determine whether they meet the standard for a new policy or should be incorporated into existing policies.
- Reviewing proposed new policy or policy updates to determine applicability across the agency.
- Establishing a quality assurance process for new or updated policies to ensure they meet the standards of the policy framework and naming convention
- Assigning policy, procedure, and associated document numbers.

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- Proposing any needed modifications to the policy framework and naming convention.

Bulletin Committee

A cross-department committee that owns the Bulletin Policy, ORG.1002.000.000, and is responsible for establishing procedures for collecting, reviewing, and administering bulletins that contain regulatory or operational updates and changes. See policy ORG.1002.000.000 for additional information.

Compliance Committee

A cross-department committee responsible for Shadowfax compliance, with final approval authority for policies proposed by the Policy Committee, see policy ORG.1001.000.000 Compliance.

New or Updated Policies and Procedures

New or Updated Policies: New policies should not be created if there is a way to either update an applicable existing policy or add new requirements to an applicable existing policy.

New or Updated Procedures: Procedures may be created and modified as necessary at the department level and must be approved by the highest-level position for that department.

Storage and Access: All policies will be housed on a central repository with appropriate security and access level, for example, access by all staffs, access to defined management levels, IT only access.

Format

All Shadowfax policies must follow the designated format outlined in Appendix A, including having a meaningful title, scope, purpose, a reference to any regulations

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that drive the policy, a last revision date, a timeframe for next review, a policy owner and policy approver. Policies should include definitions of terms and abbreviations, be written in 14-point Arial Regular font, use easy-to-understand terms and avoid the use of jargon or overly technical language whenever possible.

The Pennsylvania Office of Developmental Programs (ODP) policies and procedures use the term “individual” instead of client, patient, etc. As part of Shadowfax’s commitment to the principles of EveryDay Lives and person-centered care, Shadowfax policies use the term “individual” in place of resident, client, patient, consumer, participant, etc. unless there is a valid legal or business reason to do so. Each policy or procedure includes a note in the footer that, “Individual is synonymous with resident, client, patient, consumer, participant.”

Policy Owner: Role assigned to the entity (committee, position, etc.) that reviews and updates the policy. May not be the same as policy Approved By. Each policy or procedure owner is responsible for putting the policy or procedure into use, including any needed training, communications, reporting, process changes, etc.

Approved By: Role assigned to the entity (committee, position, etc.) that conducts the final review and allows the policy to be officially adopted.

Naming Convention – All Shadowfax policies will follow the naming convention as outlined in Appendix B.

Contents – Policies state legal, regulatory, and business requirements, and company position, principle, or philosophy. Procedures, which are operational in nature and describe how the policies are implemented, should be separate documents and may be referenced or linked within the policy as appropriate. For example, a company file retention, purge, and destruction policy may state the company’s position on retention, purge, and destruction, however each program may have a unique procedure with requirements for that program according to the unique way the program works.

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VI. OVERSIGHT

Shadowfax’s Board of Directors or their designee(s) (the "Approved By") shall be in charge of the administration of this Policy. The Approved By responsibilities include:

- 1. Identifying the activities necessary to comply with this policy based on regulatory and program requirements.
- 2. Assigning, as appropriate, designees to implement the policy and associated procedures.
- 3. Periodically reviewing this policy and monitoring compliance to it.
- 4. Training responsible parties on their obligations under the policy.

Revision History

Name	Date	Reason for Changes	Version