Illinois School Health Centers
Policy and Procedure Manual
Numerous people contributed to this document – too many to list here. In brief, thanks to the creators of the *Anywhere School Health Center Policy and Procedure Manual*, the prelude to this manual; the Illinois Coalition of School Health Centers’ Program Development and Evaluation Committee for coordinating the development of the manual; Rush University College of Nursing for updating the information in the manual; Access Community Health, Southern Illinois University Care-a-Van, and Heartland International Health Center for generously sharing their Policy and Procedure Manuals; and the Illinois Department of Human Services for providing the guidance and ensuring the integrity of the content of this manual.
The following is an annotated table of contents, which is based on the minimum expectations of the Illinois Department of Human Services (DHS) for certification. DHS is the certification agency and largest funder of school health centers (SHCs) in Illinois\(^1\). SHCs may expand on the outline but must ensure that this basic information is covered.

Below are links to three SHC policy and procedure manuals – one is a hypothetical manual and two are actual SHC manuals. These examples are meant as a guide, to help you develop your own SHC’s policies and procedures. You are welcome to use excerpts from these manuals but it is imperative that you meet with your SHC staff, sponsoring agency, and school staff in order to develop appropriate policies and procedures to meet the specific needs of your SHC. It is recommended that you convene a group of school and community stakeholders to discuss the highlighted sections of the table of contents, since their impact goes well beyond the SHC.

Sample Policies and Procedure Manuals:

- Anywhere School Health Center Policy and Procedure Manual
- Southern Illinois University Policy and Procedure Manual

A blank template is also included in the appendix.

1. **Organizational Structure**
   *Describe the SHC organization and administration.*

   1.1 **Organizational Mission Statement**
   *Include the mission statement of the organization that operates the SHC.*

   1.2 **SHC Mission Statement**
   *Include the mission statement of the SHC which is most effective if it is created collaboratively with the sponsoring agency and school.*

   1.3 **Goals and Objectives**
   *Include the goals and objectives of the SHC and clarify how the SHC will achieve its mission. Like the mission statement, it is most effective if created with input from key stakeholders.*

   1.4 **Scope of Services**
   *Describe the types of primary health, behavioral health, oral health, and health education services provided at the SHC. Define who is eligible to receive services and how emergencies will be handled.*

   1.5 **Organizational Charts**
   *Include organizational charts of the organizations operating the SHC and the organizational chart of the SHC.*

   1.6 **Conflict of Interest**
   *Include the sponsoring agency’s conflict of interest policy. A conflict of interest may be defined as an interest that might affect, or might reasonably appear likely to affect, the judgment or conduct of an individual associated with the organization.*

   1.7 **Health Center Staffing**
   *Describe the staffing model the provider organization will employ, detailing specific staff. The recommended on-site staffing includes the following: medical director, nurse practitioner or

\(^1\) Certification requirements can be found in 77Administrative Code, part 2200 School-Based/Linked Health Centers, go to [http://www.hfs.illinois.gov/assets/112204_SHCstandards.pdf](http://www.hfs.illinois.gov/assets/112204_SHCstandards.pdf).
physician assistant, mental health provider, and medical support staff. Other staff may include substance abuse specialist, health educator, dentist, dental hygienist, and nutritionist. Job descriptions for each position must be included in this section.

1.8 Policy and Procedure Manual
Describe the process for all staff to review and sign-off annually on the policy and procedure manual to stay current with actual practice. Procedures for updating will vary from site to site and the manual should be amended as necessary.

1.9 Collaboration with the School
Describe the procedure to ensure ongoing collaboration and communication with the school.

1.10 Advisory Board
Describe the SHC Advisory Board including composition, description of the roles and responsibilities of its members, frequency of meeting times, (must meet at least once a year), and a record of the minutes.

1.11 Student Advisory Board (strongly encouraged, but not required)
If applicable, describe your Student Advisory Board – its composition, how often it meets, and description of its mission.

1.12 Compliance Standards
Include the standards and guidelines for medical, behavioral health, dental, and laboratory services in order to ensure the provision of quality care. They must include the American Congress of Obstetricians and Gynecologists (ACOG), American Academy of Pediatrics (AAP), American Academy of Family Physicians (AAFP) and National Committee for Quality Assurance (NCQA).

2. MARKETING AND OUTREACH
Describe the SHC philosophy and strategies for marketing and outreach activities.

2.1 School-based Marketing and Outreach
Describe how the SHC will market its services to the school community, including students, staff, and families. It may also include the school committees in which the SHC is involved.

2.2 Community-based Marketing and Outreach
Describe how the SHC will market its services to the community. The specific content of this section will vary across sites, depending on whether the SHC provides services to community members, among other things.

3. PERSONNEL POLICIES
Describe how personnel policies of the SHC’s sponsoring agency are followed to ensure consistency throughout the organization in critical areas of operations and personnel management. If the policy is in an electronic format, identify the location of the policy.

3.1 Hiring Practices
Outline the hiring practices of the SHC’s sponsoring agency.

3.2 Annual Performance Review
Describe the organization’s annual performance review of each SHC staff member including key elements that are included in the review.

3.3 Disciplinary
Delineate the steps to be taken in the event of disciplinary action.

3.4 Family Medical Leave Act
Describe compliance with the federal Family Medical Leave Act for pregnancy, adoption, or care of an ill family member.
3.5 **Orientation**
Describe the orientation process for new SHC employees.

3.6 **Continuing Education**
Describe the sponsoring agency’s plan to ensure that continuing education is provided for staff.

3.7 **Cultural Diversity Training**
Describe the sponsoring agency’s plan for ensuring that staff is trained in providing culturally competent care.

4. **LICENSURE AND CERTIFICATION**
Outline the requirements for licenses, certifications, and collaborative agreements necessary for SHC staff to practice.

4.1 **License and Certification for all Appropriate Staff**
Identify required licenses and certifications for SHC staff and describe the credentialing process of the sponsoring agency.

4.2 **Collaborative Agreements**
Describe how current collaborative agreements between physicians and nurse practitioners/physician assistant, define, establish, and maintain scope of practice. Include a copy of the agreement.

4.3 **Clinical Laboratories Improvement Amendments (CLIA) Certification**
Describe the process required to obtain and maintain current CLIA certification for the laboratory. Include a copy of the CLIA certificate.

4.4 **Site License Agreement**
Include a copy of the site license agreement as required between a school district and the SHC sponsoring agency.

5. **PATIENT RIGHTS AND ORGANIZATIONAL ETHICS**
Describe the rights and responsibilities of the patient, SHC and sponsoring organization, including the right to refuse treatment). Include processes that need to be in place in order to ensure that quality care is provided in a respectful, confidential and non-discriminatory manner.

5.1 **Standards of Care**
Identify the standards and guidelines that the medical, behavioral health, dental and laboratory services agree to comply with in order to insure the provision of quality care. (For example: AAP, AAFP, ACOG, ADA).

5.2 **Rights and Responsibilities**
Delineate the rights and responsibilities of both the patient and the SHC.

5.3 **Patient Eligibility**
Describe the population to be served and eligibility requirements to receive services at the SHC. It is required by DHS that all students at the school served will be eligible with proper consent. Include information on populations outside the school that may receive services at the SHC.

5.4 **Non-Discrimination**
Provide information on how the SHC will ensure that services are provided to all students regardless of race, ethnicity, gender, physical disability, sexual orientation, or ability to pay.

5.5 **Patients with Disability/Americans with Disabilities Act**
Describe how the SHC will comply with the American Disabilities Act.

5.6 **Communication with Limited English-Speaking Patients/Bilingual Services Available**
List the resources that the SHC will use when communicating with a student or parent who speaks limited English.
5.7 Deaf and Hearing-Impaired Patients
List the resources that the SHC will use when communicating with a student or parent who is hearing impaired.

5.8 Informed Consent
Describe policies to obtain parental/guardian informed consent in order for the student to receive services at the SHC and the circumstances when consent can be obtained over the telephone. Also, describe the services for which minors may consent, including reproductive and behavioral health services.

5.8.1 Parental Consent
Outline the process for obtaining consent and include a copy of the SHC parental/guardian consent form. Define “informed consent” and include a copy of the notice given to parents and/or patients.

5.8.2 Minor Consent
Describe how the SHC will ensure compliance with the Illinois Minor Consent Laws. Outline the specific services included and include a copy of the minor consent form.

5.8.3 Telephone Consent
Describe when and how telephone consent, if applicable, will be obtained and when it will be followed up with a written consent.

5.9 Parental Involvement
Describe the importance of parental engagement in improving the health outcomes of children and adolescents, the process the SHC will use to communicate with parents, and how the SHC will encourage parental involvement.

5.10 Right to Refuse Services/Treatment
Describe the right of the student to refuse services or treatment.

5.11 Patient Complaint/Grievance Process
Describe the process a student or parent can follow to file a complaint about the care provided at the SHC.

5.12 Sharing of Information with the PCP
Describe how the SHC will share information with the student’s primary care provider in order to coordinate care. Also, include the process of sharing of information as required to bill Medicaid.

5.13 Confidentiality
Elucidate how students’ records and information are kept private. This includes policies and procedures regarding facilitating access to confidential health treatment and services for minors, exceptions to the policy (medical emergency, patient risk of harm, and physical/sexual abuse), and encouraging students to involve parents in counseling and medical care decisions.

5.13.1 HIPAA/FERPA Compliance
Ensure that the SHC will comply with federal laws safeguarding student health and education information.

5.13.2 Safeguarding of Medical Records
Describe how the SHC will maintain a health record system that provides for consistency, confidentiality, storage, and security of records for documenting significant student health information and the delivery of health care services.

5.13.3 Retention of Medical Information
Describe the process the SHC will follow to retain medical information. Include duration of retention.
5.13.4 Release of Medical Information Only with Consent
Describe the process the SHC will follow to release medical information.

5.14 Mandated Reporters / Child Abuse & Neglect
Describe the process SHC staff, all of whom are mandated reporters, will follow in a suspected case of child abuse or maltreatment. Include policies as to how staff will remain current with Mandated Reporter guidelines.

6. SAFETY and EMERGENCY
Describe the policies that ensure that the SHC is a safe environment and how the staff is prepared to handle an emergency.

6.1 Site Injuries and Medical Emergencies
Describe the role of SHC staff when presented with medical emergencies.

6.2 Fire and Safety/Disaster
Describe the location of the required fire and building safety certificates and maintain a copy of the evacuation plan as determined by school authorities.

6.3 Drugs and Weapons on Site
Describe how the SHC adheres to school policies related to drugs and weapons.

6.4 Coordination of Emergency Care in Absence of Therapist
Include the protocol SHC staff will follow in a behavioral health crisis, such as suicidal ideation, in the absence of a mental health professional.

6.5 Crisis Intervention
Include the required crisis intervention plan on how the SHC will assist with a medical or mental health crisis in the school. SHC should work with school authorities to determine the SHC’s role in a crisis outside the SHC as part of the school’s crisis intervention plan.

6.6 Emergency Transport
Include the protocol established with the school as to the role of the SHC in a situation where emergency transport is deployed. This will include the role of the SHC as a first responder and will identify school staff who will accompany student in an emergency transport vehicle.

7. CARE AND ASSESSMENT OF PATIENTS
Outline procedures for the clinical assessment of the student, the provision of health education, and care coordination within the school.

7.1 Patient Assessment

7.1.1 Risk Assessment
Describe the behavioral risk assessment tool used by the SHC, how/when the tool is used, who administers the tool and responsibility for follow-up of identified risk factors. Describe process to ensure risk assessments are completed for all SHC users by their third visit.

7.1.2 Early Periodic Screening Diagnostic and Treatment (EPSDT) Guidelines
Describe the preventive services the SHC will provide as specified in the federal Early and Periodic Screening, Diagnosis and Treatment (EPSDT) program and a process to ensure provision of quality and comprehensive care to all patients.

7.1.3 Nutrition
Include the protocol to identify and treat (including education, referral and additional resources) students who are at risk for being over or underweight and/or who have poor nutrition.

7.1.3.1 Height/Weight/Body Mass Index (BMI)
Describe the protocol used to weigh, measure, and determine the student’s body mass index as part of their care at the SHC.

7.1.3.2 Nutrition Counseling and Referral
Describe the SHC protocol for providing nutritional counseling to students who are at risk of being over or under weight and/or who have poor nutrition. Include a plan for coordination of care with community resources to assist in the care of students.

7.2 Patient Education
Outline policies for providing health education services to individuals and groups, in the SHC, the school, or community.

7.3 Anticipatory Guidance
Describe the age appropriate anticipatory guidance and documentation process the SHC provides to students as part of their encounter in the SHC or in the larger school community.

7.4 Coordination of Care with the School
Describe the coordination of care for a student in need of accommodation in the school setting.

8. OPERATIONAL PROTOCOLS
Describe the policies that direct the daily operations of the SHC.

8.1 Student Appointment System
Describe how students access the services of the SHC including: how and when students make appointments; how walk-in appointments are handled; and what the school requirements are for a child to leave class to come to the SHC.

8.2 Follow-up of Failed Appointments
Establish a policy for follow-up with a student if the student misses a scheduled appointment.

8.3 Hours of Service
Establish a policy to ensure that all parties will have clear and updated information on the availability of services at the SHC including hours, services, and how to access care. Post hours of service somewhere around the SHC.

8.4 24 Hour School Health Center Coverage
Establish a policy to implement 24 hour SHC coverage so that care is available when the SHC is closed. Ensure that students have access to this information.

9. PATIENT CARE PROTOCOLS
Describe the policies that address the clinical care of students including the following: medical, reproductive health, behavioral health, substance abuse, oral health, and vision and hearing screening.

9.1 Medical Services
Include policies related to medical services provided to students.

9.1.1 Medications
Describe how the SHC manages medications including storage, disposal, prescribing, record keeping, and administration. Describe the procedure for the administration of over-the-counter and prescription medication students bring from home. Describe the procedure for ensuring stock medication, including sample medication, is kept current.

9.1.2 Emergency /Urgent Care
Describe the protocols for emergency care including notification of school authorities and parents as well as preparedness of staff and equipment.

9.1.2.1 Notification of 911 Services, School Administration, Parents
Establish a protocol for contacting emergency medical services, school authorities, and parents.

9.1.2.2 CPR Training and Verification for Staff
Establish a policy to ensure all SHC staff maintain current CPR/AED certification.

9.1.2.3 Adverse Drug Reactions
Describe the procedure for managing and reporting adverse drug reactions. Include who will be notified and the documentation process.

9.1.2.4 Emergency Drugs and Equipment
List the drugs and equipment kept in the SHC to use in an emergency. Include a process for maintaining the medical emergency kit to ensure that all components are current.

9.2 Immunization Procedures
Describe how students will be notified of need for immunizations, how records will be kept, and policies for non-required vaccinations, such as HPV. Describe collaboration with the school nurse. Refer to I-CARE (Illinois Comprehensive Automated Immunization Registry Exchange), an immunization record-sharing computer program developed by the Illinois Department of Public Health that allows public and private health care providers to share the immunization records of Illinois residents, to determine usefulness in SHC.

9.3 Reproductive Health Services
Include all reproductive health services provided at the SHC, or if by referral, describe the referral process.

9.3.1 Reproductive Health Education
Describe reproductive health education provided at the SHC.

9.3.2 Family Planning Methods
Describe the family planning methods offered at the SHC.

9.3.3 Family Planning Method Specific Consents
Include examples of the family planning method specific consents used at the SHC when prescribing a family planning method.

9.3.4 Emergency Post-coital Contraceptive Pills (ECP)
Include a protocol for administering ECP, including education and consent.

9.3.5 Sexually Transmitted Infection Testing, Counseling and Follow-Up
Describe the protocol for screening, testing, counseling, treatment, and follow-up for sexually transmitted infections.

9.3.6 Pregnancy
Establish protocols for all pregnancy related care including prevention, clinical care, health education, and referral for additional services.

9.3.6.1 Prenatal Testing/Education
Establish a protocol for pregnancy testing which includes prevention education.

9.3.6.2 Prenatal Care
Describe prenatal care services provided on site at the SHC, or the referral process.

9.3.7 Pap Smears
Establish a protocol for performing PAP smears including frequency, tracking of tests/results and follow-up, or a referral process.
9.4 Procedure for Tracking Diagnostic Tests Ordered and Results
Describe the tracking system to log diagnostic tests, results, and follow-up with students.

9.5 Behavioral Health Services
Include all behavioral health services provided at the SHC, or if by referral, describe the referral process.

9.5.1 Behavioral Health Assessment
Describe the assessment and intake process in regard to mental health and substance abuse issues.

9.5.2 Individual, Group and Family Counseling
Delineate what counseling services are provided and by whom.

9.5.3 Crisis Intervention
Describe what crisis intervention services are provided at the SHC and include the protocol developed to guide staff during a crisis.

9.5.4 Consultation with School Administrators, Parents, Teachers and Students
Outline the policy to be used by behavioral health staff when consulting with individuals outside the SHC.

9.5.5 Referrals to a Continuum of Behavioral Health Services
Establish a referral process for behavioral health services for students that need to be referred outside the SHC.

9.6 Oral Health Services
Describe oral health services provided at the SHC and include whether services are provided onsite, by a mobile van or by referral. If services are onsite, include frequency and availability of services.

9.7 Vision and Hearing Services
Establish a procedure for vision and hearing screening. Note: required school screenings must be done by persons who have completed Illinois Department of Public Health (IDPH) certification.

9.8 Procedure for Referrals and Follow-Up of Referrals
Establish procedures for referring students to another provider or service, including follow-up.

9.8.1 Referrals for External Services or Providers
Include the referral process for external services not provided at the SHC or providers outside of the SHC.

9.8.2 Coordination of Care with the Patient’s Primary Care Provider
Include the process of coordinating care with the patient’s primary care provider.

9.8.3 Follow-Up of Referrals
Establish a policy to ensure that SHC staff follow up on and document all referrals.

10. CARE OF THE ENVIRONMENT
Describe the care of the SHC environment in order to ensure safety and cleanliness.

10.1 Written Exposure Control Plan
Establish a protocol following Occupational Safety and Health Administration (OSHA) guidelines to prevent and deal with exposure to blood or other potentially infectious body fluids.

10.2 Cleaning /Disinfection of Contaminated Patient Care Areas
Describe the protocol for cleaning the patient care areas of the SHC.
10.3 Handling and Disinfection of Reusable Equipment
Describe the protocol for disinfecting reusable equipment or indicate if no reusable equipment is used.

10.4 Procedure for and Reporting of Communicable Diseases
Describe the procedure for reporting communicable diseases as defined by the Illinois Department of Public Health guidelines.

10.5 Refrigerator Regulation
Outline the process for monitoring the temperature of refrigerator used to store biologicals in the SHC.

10.5.1 Separate Space for Refrigerated Medicines
Describe the procedure used to ensure that refrigerated medications are stored appropriately.

10.5.2 Refrigerator and Freezer Quality Control Checks
Describe the procedure used to perform and document refrigerator temperature checks. Include a plan to enact if the temperature of the refrigerator drops below the minimum level and to ensure preservation of biologicals if the refrigerator/freezer fails.

10.6 Proper Storage of Sharps and Supplies
Describe the procedure for the proper storage of sharps and supplies.

10.7 Proper Disposal of Sharps and Supplies
Describe the procedure for the proper disposal of sharps and supplies.

10.8 Collaboration with Engineering Staff
Establish a policy to ensure collaboration and ongoing communication between the SHC and school engineering staff to ensure a safe and clean SHC environment.

11. QUALITY IMPROVEMENT
Describe how the SHC intends to meet the quality improvement indicators required by DHS. If the sponsoring agency requires other indicators or if the SHC chooses to include additional indicators, they should be included below.

11.1 Student Risk Assessment
Describe how the SHC will assure that 75% of SHC users receive an initial Risk Assessment by their third visit to the SHC.

11.2 Mental Health
Describe how the SHC will implement a process to develop and continually improve mental health services by developing a Mental Health Improvement Plan (MHIP). Describe the process to submit required reports to DHS.

11.3 Overweight/Obesity
Describe how the SHC will implement a plan to identify overweight or obese students and document action plans and interventions.

11.4 Medical Chart Audit
Describe how the SHC will implement a plan to complete a clinical chart review. Describe how the SHC will review a random sample of charts utilizing a standardized review tool. If charts are maintained separately for dental or behavioral health services, a separate audit should be performed on those charts by the appropriate providers.

11.5 Patient Satisfaction Survey
Describe how the SHC will implement a survey to assess user satisfaction with the services provided at the SHC.
12. **FINANCE**  
*Describe the practices used to bill and collect payment for services provided at the SHC ensuring that no child will be refused services for inability to pay.*

12.1 **Fee Schedule**  
*Establish the fee schedule for services provided at the SHC and identify a process to update this annually.*

12.2 **Billing and Collection**  
*Describe the billing and collection practices implemented at the SHC.*

12.3 **Insurance Status**  
*Identify the process to obtain the insurance status of the children registered to receive services at the SHC. Be sure to identify a process for assisting with Medicaid enrollment.*

**OPTIONAL 2200.60.c.2, 3**  
*This also could be described in scope of services.*

1. Well child care of the children of students  
2. Care of Faculty  
3. Care of Community
NAME OF POLICY:

INTENT OF POLICY:

IMPLEMENTATION OF POLICY

SAMPLE