



## POLICY DEVELOPMENT AND IMPLEMENTATION

**Effective:** September 12, 2014  
**Replaces:** October 15, 2012

### I. Purpose

The purpose of this policy is to establish standards for the creation, revision, and implementation of Santa Clara County Prehospital Care Policy (including plans, protocols, procedures, etc.).

### II. Format and Process

The EMS Agency shall develop and maintain a standard policy format and policy development process.

### III. Policy Generation

The Santa Clara County EMS Agency is responsible for creating and implementing policy related to emergency medical care and services within the Santa Clara County. Whenever possible, various advisory groups are provided with the opportunity to provide comments to the EMS Agency prior to implementation.

### IV. New Policy Process

- A. EMS Agency staff is responsible to create proposed EMS policy. Any system stakeholder may request the creation of a policy through an existing advisory committee or in writing to the Agency.
- B. EMS Agency staff will make policy drafts available for an open comment period of a minimum of thirty (30) days before adoption whenever possible.
- C. During open comment periods, all suggestions must be submitted electronically in writing to the EMS Agency. Each suggestion/comment will be posted to a master list and made available to all system participants for review.
- D. Based on the nature of a proposed policy, the EMS Agency may hold a policy hearing. Such hearings will be open to the public.
- E. Based on the nature of a proposed policy, the EMS Agency may also hold an administrative review. Such review will include department/company senior managers and Agency staff and may be held at any time.



- F. Whenever possible, significant system-wide changes will be adopted annually to ensure sufficient time for advance planning and training. This may include clinical protocols and orders, master plans, etc.
- G. The EMS Director will review all comments and suggestions with Agency staff and determine final policy content. The Medical Director will work with the EMS Director to review all clinical protocols.
- H. Once the EMS Director has approved a policy, an effective date will be issued. The EMS Director and the EMS Medical Director will sign each policy for approval.
- I. In general, policies will become effective no less than thirty (30) days after approval. Effective dates may vary based on the financial, regulatory, and operational impacts of the policy.

**V. Revision Process**

- A. All policies will be reviewed by Agency staff no less than every three (3) years. The established review date will be posted on each policy.
- B. All protocols will be reviewed by Agency staff no less than every two (2) years. The established review date will be posted to each protocol.
- C. Policy revisions will be made in accordance with the procedure identified in Section IV.
- D. The review date does not affect the validity of the policy or protocol. Policy and protocol remain in effect until superseded or rescinded.

**VI. Administrative Orders**

- A. The EMS Director, or designee, may issue Administrative Orders when immediate changes are necessary to protect the public's health and safety.
- B. Administrative Orders relating to clinical care or medical control will be issued jointly by the EMS Director and EMS Medical Director or their designee.
- C. Administrative Orders bypass the review processes identified in this Policy.
- D. Administrative Orders are valid for a prescribed period but not greater than one (1) year without being reissued. Administrative Orders are transitioned into policy as soon as appropriate and reasonable.



**VII. Minor Policy Revisions**

The EMS Director may authorize minor revisions to policy without public comment. Minor revisions will be limited to those policy changes that: (1) are required by superseding federal or state statute or regulation; (2) do not have material financial or operational impact on EMS Providers; or, (3) correct minor typographical, grammar, or administrative variances.

**VIII. Production and Distribution**

- A. To the extent possible, the EMS Agency will review, revise, draft, seek and receive public comment, and issue EMS Policies and Procedures and EMS Treatment Protocols in a single packet annually.
- B. The EMS Agency will release to stakeholders a calendar of the policy development, revision, and approval process.
- C. The EMS Agency will notify System Stakeholders about proposed or final policy changes.
- D. An electronic copy of all policy revisions will be sent to each EMS Program Manager, made available on the EMS Agency website, or distributed via other electronic media.
- E. All hardcopy materials will be available for purchase in accordance with approved County fee schedules.
- F. All documents produced by the County (manuals, protocols, etc.) may not be modified without the prior approval of the County.
- G. Santa Clara County EMS Service Providers are responsible for disseminating new and revised policies to individual employees, providing required training, and ensuring compliance by the implementation date identified.

**IV. Process for Requesting Policy Modifications**

- A. Any person may submit a request for a modification to any policy. This request shall be provided in writing to the designated EMS Agency staff responsible for the program area as identified on the EMS Agency website. The request must identify the following:
  - 1. Name of requestor.
  - 2. Contact information (phone, email, etc.).



3. Representation (organization, self, association).
  4. The explanation of the problem.
  5. The reason the requestor believes a problem exists.
  6. Recommended resolution options.
- B. The EMS Agency staff may review the request with appropriate parties and/or organizations. In addition, requests related to medical care protocols will be reviewed by the EMS Medical Director.
- C. The EMS Director or designee will provide a written response to the request as soon as practicable.
- D. The decision of the EMS Director (or designee), in cooperation with the Medical Director, will be final.