



**Updated December 2020:**

## **Supplemental Guidance for PHAB Accreditation Procedures**

**August 1, 2020 – December 31, 2021**

This document updates the supplemental guidance released by PHAB in July 2020. All updates are highlighted in yellow below. Sections of the supplemental guidance that do not include updates will continue to be implemented. This is indicated by: *(No changes)* at the end of the section.

### **Extensions**

Health department requests for extensions of up to 90 days will be approved by the Accreditation Specialist. This may include a one-time extension of up to 90 days for the payment of the department's annual accreditation service fee. Requests for extensions for periods greater than 90 days should also be made to your Accreditation Specialist but will be reviewed and approved by PHAB's Chief Executive Officer. **Update:** PHAB has developed an application form for extensions of more than 90 cumulative days. See Addendum for more details.

### **Health Department Documentation Upload**

In the survey responses, some health departments requested that, instead of only health department directors, deputy directors or other health department staff be allowed to sign off on items in e-PHAB. Health departments currently have two options. The first would be to designate the deputy as the director in e-PHAB. This is easy to do. To change the Director role in e-PHAB, the Health Director must submit this request in writing (email) to the assigned Accreditation Specialist. The second option is for the health department director to provide their password to the deputy or other staff person to act on behalf of the health department director in e-PHAB. *(No changes.)*

### **Time Frames for Documentation**

Health departments working on documentation through both the 90-day pause and/or an extension may encounter having some of their documentation "age out" and fall outside the acceptable timeframe requirements outlined in the Standards and Measures. PHAB is lengthening the acceptable timeframe by one year for all measures for both initial accreditation and reaccreditation. For example, the Standards and Measures require that a Community Health Improvement Plan be dated within the last five years from the date of a health department's submission of their documentation. PHAB will accept community health improvement plans that are dated within six years of the document submission date. This lengthened timeframe should accommodate PHAB's 90-day pause and most approved process extensions. These time frame extensions will be in place for health departments submitting documentation through June 30, 2021. **Update:** This policy will be in place for health departments submitting documentation through December 31, 2021.

### **Documentation Examples**

PHAB will allow the submission of examples that were created after the health department's original documentation submission date (for responses to completeness reviews, pre-site visit reviews, and

requests for additional documentation during the site visit), **if the documentation is COVID-19 related**. PHAB's policy has historically not allowed health departments to submit documents that were created after the date they initially submitted their documentation to PHAB. Adjusting this policy will allow health departments to use examples from recent COVID-19 work reflecting their immediate priorities.

**Update:** PHAB is expanding this policy to allow the submission of examples that were created after the health department's original documentation submission date (for responses to pre-site visit reviews and requests for additional documentation during the site visit), whether or not the documentation is COVID-19 related.

PHAB has developed guidance on what is within PHAB's scope of authority to assess for COVID-19 examples. This is an Addendum to the PHAB Tip Sheet, Guidance on Appropriate Examples from Programs and Activities for Use as Documentation for PHAB Accreditation that was released in January 2015. It can be accessed from PHAB's [webpage](#). This addendum does not change PHAB's policy about acceptable documentation but serves as guidance specific to COVID-19 examples. It is not an exhaustive list of what is and is not acceptable. If you are unsure if a COVID-19 example produced by your health department will be acceptable as PHAB documentation, please contact your assigned Accreditation Specialist.

### **Reaccreditation Requirements**

Currently, there is a question concerning "continued advancement" for each reaccreditation requirement. Answering this question is no longer required; it is optional for all requirements.

**Update:** In addition to the paragraph above, for Reaccreditation Measures that require a "Narrative Description of an example," health departments have the option of providing a narrative description or an example so long as it covers the components in the Standards & Measures Requirements and Guidance.

PHAB has also created a simplified version of the "Reaccreditation Documentation Form - Relationships with Other Health Departments" that is available in Bridge and on the Accredited Health Department Portal, as part of the Accreditation Documentation Forms document. Health departments may choose to use this form or the original form.

### **Documentation Review**

PHAB recently revised its documentation review process to utilize PHAB staff's comprehensive knowledge of PHAB's measure requirements and reduce the overall time commitment and demand for site visitors. The aim of these process changes is to shorten the overall accreditation review process.

In the revised documentation review process, the assigned Accreditation Specialist will conduct the Completeness Review and the Pre-Site Visit Review simultaneously. The health department will then respond to reopened measures from the Completeness Review and the Pre-Site Visit Review at the same time, rather than in two separate steps. All measures scored less than Largely Demonstrated will be reopened and the health department will have 45 calendar days to respond with additional documentation.

When a measure is assessed as Largely Demonstrated or Fully Demonstrated in the site visit report, the Accreditation Committee concludes the health department has demonstrated adequate conformity to PHAB requirements. Therefore, only measures scored less than Largely Demonstrated will be reopened

during PHAB's combined Completeness and Pre-Site Visit Review.

After the health department's response, trained volunteer site visitors will conduct an independent review of all measures that staff assessed as less than Largely Demonstrated. PHAB will assign up to two site visitors to each health department based on the number of reopened measures. Having fewer measures to assess should reduce the time spent as well as number of site visitors needed for each review and allow PHAB to assign site visitors sooner. The Accreditation Specialist and site visitor(s) will conduct the virtual site visit and write the site visit report.

**Update:** PHAB will continue to test this review model through June 2021. We are collecting evaluation data about the model and will make a decision about whether to continue, modify, or stop using this review model based on those data. Additional clarification: for reaccreditation, all measures scored as Not Met during the combined Completeness Review and Pre-Site Visit Review will be opened. Measures scored as Met will not be reopened.

### **Virtual Site Visits**

PHAB has previously informed health departments that all future site visits will be conducted virtually, at least through 2020. PHAB will continue to evaluate the health and safety issues related to COVID-19 and travel on an ongoing basis and it may be necessary for site visits to be virtual into 2021. **Update:** Site visits will be conducted virtually through June 30, 2021. PHAB will make a determination about site visits scheduled for the second half of 2021 by May 15, 2021.

Each applicant health department's site visit agenda, including dates, times, participants, and technology needs, will be developed in consultation with the department's Accreditation Coordinator. Please be assured that a virtual site visit will not negatively impact the accreditation decision.

Additionally, PHAB Accreditation Specialists are experienced in virtual site visits and are ready to support health departments in preparing for their site visit. For example, Accreditation Specialists will always hold pre-site visit calls with health departments to discuss logistics and test technology. PHAB will also develop tip sheets and other guidance to explain the process, including suggestions related to the partner and governing entity sessions.

During the site visit, the site visitor or Accreditation Specialist may ask the health department to upload specific documentation into e-PHAB. Health departments currently are given two business days from the end of the site visit to provide that documentation. The Accreditation Specialist may allow longer, at her discretion, in consultation with the health department.

### **Site Visit Preparation**

In preparation for the site visit, the site visitor(s) and Accreditation Specialist will prepare questions about specific measures. PHAB will provide applicant health departments with a list of those measures in advance of the site visit. This will help the health department prepare and ensure they have the right staff available during the site visit. Of course, other measures may come up during the site visit. If additional documentation is requested and the needed staff person is not available at the time of the site visit, the Accreditation Specialist will open the measure if it has been assessed as less than Largely Demonstrated for the health department to gather the requested documentation and upload it into e-PHAB within an agreed on timeframe, after the site visit. *(No changes.)*

### **Site Visit Timing**

To address some of the concerns expressed by both site visitors and health departments about blocking off full days, PHAB intends to break up the site visit over three days: four hours, four hours, and three hours. This will also help with time zone differences for those involved in the site visit. The Accreditation Specialist will work with each department to identify site visit dates and a schedule that will work best for all parties. Additionally, PHAB does not intend to hold multiple domain sessions concurrently. Domain interviews will be conducted in groupings that will be agreed on by the health department and site visit team. *(No changes.)*

### **Annual Reports**

Templates for Section 2 of the Annual Report have been revised in two ways: (1) to make answering an increased number of questions optional and (2) to point out where COVID-19 work can be described. These new forms are posted on Bridge and on the Accredited health department page on the PHAB website. (If you have already started the process using the old Section 2 templates, you can use the old templates.)

However, it should be noted that a health department provided an extension to the due date of their Annual Report will be expected to meet their original due date for the next year's Annual Report and for reaccreditation. For example, if a health department's Annual Report is due no later than June 30 and they are provided a 90 day extension for this year's Annual Report, the health department would still have the deadline of June 30 for the next year's Annual Report and, when the time comes, the reaccreditation application would be due June 30. The impact of this would be that health departments may have to submit two Annual Reports within the same 12-month period. PHAB wants to help keep health departments on track for reaccreditation. *(No changes.)*

## Addendum: Extension Policy in effect from December 14, 2020 through December 31, 2021

### Proposed Extension Policy

The Public Health Accreditation Board is establishing this extension policy to assist health departments needing to balance accreditation activities with response to the COVID-19 pandemic. The policy addresses the need for clear communication and expectations, and a process for extension requests.

### Process

If a health department will miss any PHAB deadline, they need to submit a written request for an extension to their Accreditation Specialist (AS).

If the health department is requesting an extension of 90 days or fewer,<sup>1</sup> it can be submitted via email. The health department director must either be the one sending the email or be cc'd on the email.

If the extension is greater than 90 days,\* the health department will need to complete the application form (posted on our [website](#)) and email it to their Accreditation Specialist. The health department director must sign the application to indicate their agreement with the following information about fees.

- All health departments are required to pay invoices (including those for Annual Services Fees) by the invoice due date.
- If the health department is applying for reaccreditation or is about to apply for reaccreditation and they are requesting a cumulative extension of more than 90 days, the health department would have the option of either:
  - Paying the reaccreditation review fee according to their original schedule; or
  - Paying a fee of \$1,850 at the time the extension is approved, of which \$1,000 would be credited to the future review fee. (The remaining dollar amount covers fixed costs associated with maintaining the health department in e-PHAB.)

These fees cover costs associated with keeping the accounts in e-PHAB, providing access to support from the Accreditation Specialists, access to webinars and any educational offerings from PHAB, and continuation of the accredited status during the extension timeframe for accredited health departments. If you have questions about the ongoing fees, please contact Mark Paepcke, Sr. Vice President for Finance and Business Operations at [mpaepcke@phaboard.org](mailto:mpaepcke@phaboard.org) or 703.778.4549 Ext 104.

Health departments can request extensions for steps in the accreditation process they are currently in or will begin within 180 days. For Response to Pre-Site Visit Review, health departments can make a request after their documentation has been submitted and those extensions will go into effect starting on the date the health department receives its reopened measures. For Reaccreditation Applications, those extensions will go into effect starting on the date their application opens in e-PHAB. In other words:

- Health departments whose reaccreditation application period will begin in January 2021 or April 2021 can request extensions now.

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<sup>1</sup>The 90 days addresses the cumulative amount of time the health department is requesting an extension for a given step in the process (e.g., application, documentation submission, response to pre-site visit review, ACAR, or Annual Report). In other words, if a health department already requested and received a 60-day extension for that step in the process, and they would like to request an additional 45-day extension, the application form is required. This does NOT include extensions that were granted to all health departments automatically in March 2020 (or when health departments first entered the Annual Report).

- Health departments whose reaccreditation application period will begin in July 2021 can request extensions after January 1, 2021.
- Health departments whose reaccreditation application period will begin in October 2021 can request extensions after April 1, 2021.