

# Site Visitor Guidance: Requests for Information or Additional Documentation

Revised June 2015

## Introduction

There are two opportunities during the accreditation review process when Site Visitors may ask the health department questions about documentation and may reopen measures for health departments to upload additional documentation. The first opportunity is during the Site Visit Team's Pre-site Visit Review of the documentation and the second time is during the on-site review.

The purpose of these opportunities is to provide the Site Visit Team with the information they need to develop a Site Visit Report that accurately describes how conformity with the measures was demonstrated or details what is missing. **The overall objective is for the Site Visit Report to accurately reflect the health department's demonstration of the measures, the department's strengths and challenges, and how the health department functions.**

**NOTE:** Some questions will be more appropriate to ask the health department during the on-site review. These questions could be about, for example, how policies are implemented, how working relationships with partners are maintained, who is involved in performance management, successes and challenges of program services, results of program activities, areas where the health department would like to improve, or how information is shared within the department or with partners.

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## Instructions

### Pre-site Visit Review

Before the Site Visit Team conducts an on-site review, the Site Visit Team will review all of the documentation submitted by the health department. During this Pre-site Visit Review, the Site Visit Team may submit questions to the health department about the documentation that has been submitted. The Site Visit Team may also reopen measures for the health department to upload additional documentation.

In response to the Pre-site Visit Review questions and reopened measures, the health department will have 30 days to provide answers to questions and upload additional documentation. The Site Visit Team will have an opportunity to review the answers and additional documentation before they go on-site.

- There is not a minimum or maximum number of measures that can be reopened or about which the Team can ask questions. Site Visitors will use their professional judgment in determining whether additional information is needed. If there is any uncertainty about whether a request is appropriate, the first step is for the Site Visit Team to discuss the measure and the documentation. If questions still exist, the Site Visit Chair should check with their Accreditation Specialist using SV Char/PHAB Q&A function in e-PHAB.
- All questions or requests for additional documentation should be targeted and specific, simply asking for what is needed. Comments related to conformity of documentation or explanations of why information or documentation is being requested should not be included in the question or request.
- All questions or requests for additional documentation should relate to the requirements in the Standards and Measures. Additional information that goes above and beyond what is required should not be requested.
- Questions should be asked to clarify and better understand how the health department's documentation demonstrates conformity with a measure. Questions should clarify the current evidence in e-PHAB, but cannot take the place of documentation.
- If a health department uploads documentation other than what was specifically asked for, the Site Visit Team should disregard it.
- Any additional documentation that a health department submits in response to a Site Visitor request must be dated on or before the department's original documentation submission date in e-PHAB. This date can be found on the Home tab in e-PHAB. The applicant may not create or submit new evidence or change/revise the documentation that was previously submitted.

### Site Visits

During the on-site review of the health department, the Site Visit Team may reopen a measure for the health department to submit additional documentation. During the on-site visit, the applicant may not suggest or offer additional documentation; however, the Site Visit Team may decide to request additional documentation to be uploaded.

- All requests for additional documentation should be targeted and specific, simply asking for what documentation is needed. Comments related to conformity of documentation or explanations of why information or documentation is being requested should not be included in the question or request.
- All additional documentation submitted by the applicant must be uploaded onto e-PHAB; i.e., no paper documentation will be reviewed or accepted.
- Any additional documentation that a health department submits in response to a Site Visitor request must be dated on or before the department's original documentation submission date in e-PHAB. This date can be found on the Home tab in e-PHAB. The applicant may not create or submit new evidence or change/revise the documentation that was previously submitted.

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## Guidance Examples

### Requests for Additional Documentation (Reopen)

Examples of situations and language when it is appropriate to ask for additional documentation, i.e. reopen the measure, include:

**1. The documentation is of an activity that is outside of PHAB's scope of authority.** The Site Visit Team should provide an opportunity for the health department to provide documentation from an activity that is in scope. For guidance on in-scope and out-of-scope examples, refer to the document *Guidance on Appropriate Examples from Programs and Activities for Use as Documentation for PHAB Accreditation*.

#### Sample Reopen Language

- Document 1.1 is a clinical activity and is outside of PHAB's scope of authority. Please submit an additional example that is within PHAB's scope of authority.

**2. The documentation does not match the specific requirements in the Standards and Measures or is missing required elements.** The Site Visit Team may ask for documentation that matches the requirements in the PHAB Standards and Measures.

#### Sample Reopen Language

- Required Documentation 2 requires two examples, one of which must be from a program area and one which must be from an administrative area. Both examples appear to be from an administrative area. Please provide an example from a program area.
- Required Documentation 3 requires two examples, one of which must from a chronic disease program. Both examples provided appear to be from environmental health. Please provide a chronic disease example.
- Required documentation 2 requires three elements. The third element is missing. Please provide documentation that includes that required element.

**3. A majority of the documentation was selected from a limited number of department program areas.** Site Visitors should review the list of programs that the health department provides (contained in the health department's application) to determine if a cross section of program areas are represented in the documentation. Site Visitors may request documentation from additional program areas if a cross section of programs is not represented in the documentation.

#### Sample Reopen Language

- Much of the documentation provided throughout Domain 3 relates to tobacco use prevention. For Measure 3.2.3, please provide an example from another program area in order to demonstrate a cross section of programs within the health department.

**4. The documentation is outside of the required time frames.** The Site Visit Team may request that the health department provide a more recent version (dated on or before the date of the submission of documentation PHAB).

#### Sample Reopen Language

- Document 3.2 is dated outside of the required timeframe. Please provide another example that is dated within the last 5 years of documentation submission.

**5. The document is not current and in use in the health department.** For example, a contract, MOU, or laboratory certificate may have expired prior to documentation submission. In this case, the issue is not that the document is outside of the required time frame, but that it is not current and in use. The Site Visit Team may request that the health department provide a current and in use document.

#### Sample Reopen Language

- Document 2.4 expired prior to documentation submission. All documentation must be current and in use at the time of documentation submission to PHAB. Please provide a current version of this document or another example.

**6. The number of examples was not sufficient.** If one example was submitted, and two examples are required, the Site Visit Team may request an additional example.

#### Sample Reopen Language

- Required Documentation 1 requires two examples. Only one example was provided. Please provide an additional example.

**7. The documentation does not address the measure.** It may appear from the documentation and its description that the health department misunderstood a specific requirement of the PHAB Standards and Measures and uploaded documents that are immaterial or irrelevant to the measure. The Site Visitors may ask the health department to reconsider the requirements and submit documentation that is applicable to the specific requirements.

#### Sample Reopen Language

- Based on review of the documentation, it appears that there may have been a misunderstanding or misinterpretation of Required Documentation 1. Please reconsider the requirements and submit two additional examples. The intent of measure 11.2.2 is that two examples be provided of current contracts/MOUs/MOAs where the health department has delegated or purchased a service to be provided by another entity.

**8. The documentation does not include evidence of the health department's accountability for a program or service.** For example, an MOU may be required to show that another organization provides a program or service on behalf of the health department, or a membership list may be required to show the health department's participation in a partnership. The Site Visit Team may reopen a measure to request this supporting information.

#### Sample Reopen Language

- Document 1.5 is a report prepared by the Healthful Coalition. However, it is unclear how the health department is involved in this coalition. Please provide proof of the health department's membership and involvement with this group.

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**9. The documentation references other documents that are not included but which are necessary to assessing the measure.** The Site Visit Team may request that the health department upload the documents that are referenced but not included. For example, the department uploaded a meeting agenda, but additional documentation, such as meeting minutes, is needed to demonstrate who was present, how they were involved, or evidence of the discussion or actions taken that occurred during the meeting.

#### Sample Reopen Language

- Document 3.2 references a companion document that describes the process used. Please provide this companion document.
- Document 1.2 is a meeting agenda. Please provide the meeting minutes that correlate to the agenda provided.

**10. The department uploaded documentation in a measure and the Site Visit Team feels it would be an appropriate example for another measure.** It is not the responsibility of the Site Visit Team to search through the documentation for an upload that would work for a measure. However, if they notice documentation that would be appropriate for a different measure, they may request that the document be uploaded for that measure. In that case, the Site Visit Team may open the specific measure and request that a particular piece of documentation be uploaded there.

#### Sample Reopen Language

- Please upload Document 1.6 from Measure 1.1.2 within Required Documentation 1 of measure 1.1.1.

## **Questions (Pre-site Visit, Reviewed with Questions)**

Examples of situations and language when it is appropriate to ask a health department a question include:

**1. The health department's documentation consists of several documents** and it is not clear to the Site Visit Team how they tie together and how they address the PHAB Required Documentation. The Site Visit Team might ask for an overall description of the several pieces of documentation that have been submitted for a measure or a Required Documentation.

#### Sample Question Language

- For Required Documentation 1, please explain how the documents provided tie together to demonstrate conformity with this measure.

**2. It is not clear what the uploaded documentation is.** The Site Visit Team may request a more specific description of the context or use of the document in order to understand how it is intended to demonstrate conformity with the measure.

#### Sample Question Language

- For Required Documentation 2, please explain how the documentation provided is intended to demonstrate the measure.

**3. The upload description of the document does not appear to match the documentation.** The Site Visit Team may ask for further clarification or a description of how the documentation meets the documentation requirements or how the documentation provides specific evidence of conformity to the measure.

#### Sample Question Language

- The upload description provided for Document 3.4 does not appear to match the upload. Please clarify how the document provided meets the intent of Required Documentation 3.

**4. The Site Visit Team cannot locate the specific part of the document that addresses the PHAB Required Documentation.** The Site Visit Team might ask the health department to provide directions to the specific location (page and paragraph number) of the relevant part of the document.

#### Sample Question Language

- For Document 4.1, please indicate the page numbers where the required elements can be found within the documentation provided.
- For Document 3.3, please specifically identify where required element (d) can be found within the documentation provided.

**5. The documentation includes names of individuals involved in meetings, coalitions, activities, etc., but does not indicate who the individuals are or what their role is.** The Site Visit Team might ask the health department to describe the organizations with which the individuals are affiliated and/or how they contribute to the group.

#### Sample Question Language

- Document 1.3 is an email sent to multiple individuals. Please identify who these individuals are and what their roles are.

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## *When to **NOT** Ask a Question or Ask for Additional Documentation*

Examples of situations where it is not appropriate for the Site Visit Team to ask a health department a question or request additional documentation include:

- 1. The documentation is not to the Site Visitors' liking.** The Site Visitor may not like the particular program or process, but it demonstrates the measure.
- 2. A sufficient number of other examples were provided** that demonstrate the measure (i.e. extra examples were provided). If, for example, three examples are provided and two of them demonstrate conformity with the measure, the Site Visit Team should not ask questions about the third example.
- 3. It is not needed for the measure,** i.e. it's beyond the scope of the measure. Site Visitors should not ask questions or ask for additional documents to address an issue that is not specifically required in the Standards and Measures. Comments that relate to issues that are not required may be placed in the Area of Excellence or Opportunities for Improvement text boxes.
- 4. Requests for new documentation,** created after original documentation submission, should not be made.
- 5. The measure is scored as Fully Demonstrated.** During the Pre-site Visit Review, if a measure is scored Fully Demonstrated there is no need to ask for additional information. During the Site Visit, questions can be asked about Fully Demonstrated measures in order to validate the documentation.

**Remember, the objective is for the Site Visit Report to accurately describe the health department. Site Visitors should ask questions and ask for additional documentation when it is required for them to be able to write a Site Visit Report that reflects the reality of the health department, how they operate, and how they provide public health services.**