

## WRITING CONFORMITY COMMENTS

Examples use the Standards & Measures, Version 1.5

The conformity comment is a narrative written by a Site Visitor concerning the documentation submitted for a measure and explains the assessment of that measure by the Site Visitor. Conformity comments are important to two audiences: the Accreditation Committee and the health department.

- The *Accreditation Committee* uses the information as the basis to determine the accreditation status of the applicant. The Accreditation Committee will not have access to the documentation, so a good description of what was provided and how it demonstrated the measure is very valuable.
- The *Health Department* uses the information to understand why they received the assessment score they did for the measure. It also provides guidance on how they can improve. Clear comments of what is missing will assist the health department in their continuous quality improvement efforts which they will describe in their annual report. The health department will refer to the conformity comments if an action plan is required.

The intent of the conformity comment is to explain how the assessment was determined and/or why the assessment was given. The conformity comment is based on your documentation review, site visit interviews, observations, and team discussions.

A conformity comment is required for every measure, even if the measure is determined to be fully demonstrated. However, it is not just a matter of saying that the measure received a certain score, but why the documentation merits the given score.

### Conformity Comment Guidance

- Tell *HOW* the documentation did or did not demonstrate conformity to the measure (and/or the Required Documentation sections, if more than one)
  - Listing or naming the documents without explanation is not helpful to the Accreditation Committee or the health department. The comment should not be generic or a copy of the measure requirements. Comments should not be a copy of the health department's file descriptions or measure narrative.
- You can write the conformity comment by required documentation or as one paragraph that summarizes the measure. Use the method that best explains to the audiences of the report how the measure was scored. If using the method of breaking it down by required documentation, be sure to include all the required documentation sections of the measure. If you choose to write a summation for all required documentation, include all sections and required documentation in the comments.

- Completely describe or summarize the examples. If two examples are required, do not refer to only one in your comments. It gives the appearance that only one example was provided.
- Note any required elements that were not present. If the measure is assessed as less than fully demonstrated, you must explain what was missing to warrant the assessment given. Likewise, if a measure is fully demonstrated, the conformity comment should not indicate that there were items missing from the documentation.
- Make sure that any dates in the comments are within the timeframes in the measure.
- Conformity comments should address what is required in the measure. Do not combine any areas of excellence or opportunities for improvement in the conformity comment. Comments that go beyond the measure requirements should be placed in the opportunities for improvement or areas of excellence boxes as appropriate.
- If you have an opportunity for improvement that goes beyond what is required by the standard/measure, particularly when the measure is scored fully demonstrated, be sure the following comment precedes your comment, "while this measure was scored (fully or largely) demonstrated by the documentation submitted, the site visit team identified an opportunity for improvement that goes beyond the Standards and Measures."

If you have any questions about the site visit report and how to develop a conformity comment, ask your Accreditation Specialist.

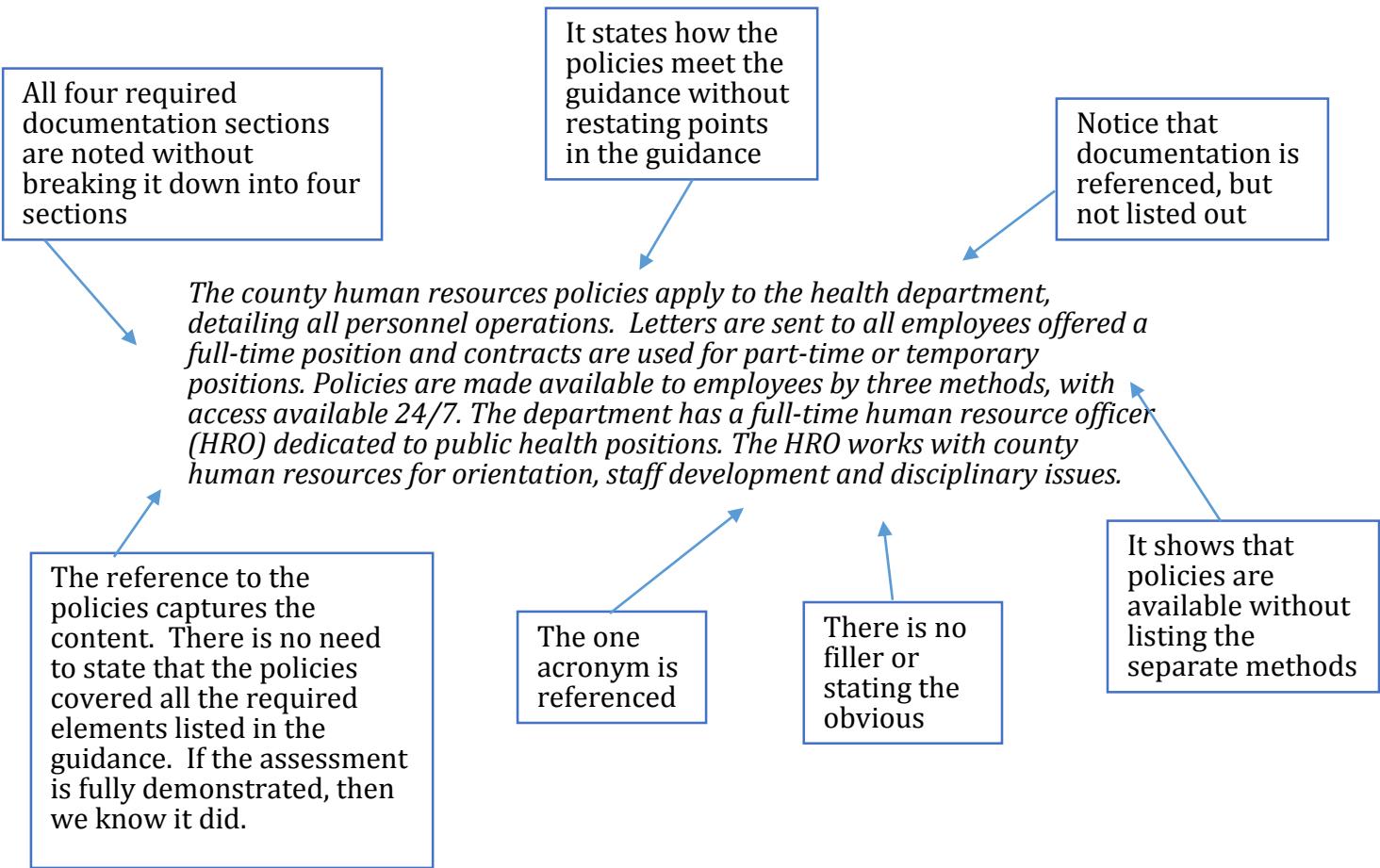
### Sample Conformity Comments

As an example, let's look Measure 11.1.5 A – *A human resources function*. Consider the following conformity comment for an assessment of fully demonstrated:

*The health department provided the human resource policies that are used by the county and they are available to staff. They don't use labor agreements.*

While that gave us some information, it's not complete. The health department provided the human resource policies; that was required. But, how do the documents demonstrate conformity? Also, the comment doesn't mention the other required documents in the measure. The statement that the health department doesn't use labor agreements sounds like something is missing, which conflicts with the fully demonstrated score given to the measure.

Now consider the following comment:



Using Measure 11.1.4 A, look at a conformity comment written by required documentation. If this style is used, each section is written as a comment to show how the evidence within that section conforms to the requirements.

Consider this comment:

*RD 1: The health department provided a policy that had a health equity section.*

*RD2: The health department provided two examples of how it provides services to meet cultural or linguistic needs.*

*RD3: The health department provided a self-assessment of health equity competence.*

*RD4: The health department provided an agenda for the staff training on health equity.*

The comments states what was submitted by the health department, however, it does not explain how the documents demonstrated the requirements of each

section. Here is the same style that provides the information needed. Each required documentation section provides a complete comment.

*RD 1: The health department's policy on cultural competence is a part of the Human Resources Manual. The policy includes aspects of language, belief, non-discrimination and ethnicity/disparities. It includes steps for incorporating the policy into the functions and services of the health department.*

*RD2: Implementation of the policy was shown thru evidence of Environmental Health communication with Latino landowners and restaurant owners. Another example showed the steps taken by staff for community education when someone is present who is hearing impaired, including forms and aids. The department has a health educator who knows American Sign Language.*

*RD3: The health department conducts an assessment of health equity competence every other year using a tool provided by the State Office of Minority Health. The tool is based on the Culturally and Linguistically Appropriate Services (CLAS) standards.*

*RD4: The health department conducts annual training on health equity for any staff member who interacts with the public. The training packet was submitted including all handouts, the slide set, agenda and attendance logs.*

Here are examples of conformity comments for each of the measure scores. The following examples are based on the supposition that documentation is appropriate for the given score.

### **Fully Demonstrated**

Measure 3.2.1 A: Information on public health mission, roles, processes, programs and interventions to improve the public's health provided to the public

*RD1: Screen shots of web pages were provided. One page contained the mission, vision, and values along with a services listing of the department. The second page had FAQs about public health and links to the state health department and other public health resources. The department developed a brochure titled "What is public health?" which is available in county buildings, sent to local providers, placed in local libraries and sent to school nurses.*

*RD2: The department has a daily radio spot. A recording called "The Good Health Minute" was provided that is taken to the local radio station each week and is played each morning. The department keeps a press contact log for when they are contacted by, or when they contact, the media. Entries included the local paper, a Spanish language weekly and a local news blog.*

## Largely Demonstrated

Measure 1.1.3 A: Accessibility of community health assessment to agencies, organizations, and the general public

*The department distributed the report on its website and stated that this was for both partners and the community. There was a link to the report from the homepage of the website. An executive summary of the assessment report was mailed to elected officials. There were plans for a community forum on the assessment, but it had to be cancelled, thus there was no second example of distribution to the public.*

## Slightly Demonstrated

Measure 12.3.2 A: Actions taken by the governing entity tracked and reviewed

*Evidence was minutes from Board of Health meetings that discussed support for state efforts to ban synthetic marijuana, the Board's 2013 Annual Report and adoption of department policies and plans.*

*The documentation showed selected reviews by the Health Department, but didn't demonstrate a systematic, annual review. While some patterns within specific reviews were mentioned, there was no review of patterns from a review of all actions taken or issues discussed within a year's timeframe. Also, while opinions and positions for the specific topics were noted, there was no annual review of this.*

## Not Demonstrated

Measure 7.2.1 A: Process to develop strategies to improve access to health care services

*Minutes of a Regional Care Collaborative meeting included participant names but did not identify what agency or partner they represented. They did not address a strategy for improving access to care or reduce barriers.*

*Documentation included a letter of support for an organization to provide Maternal Care Services, but did not describe how these services are part of a strategy to improve access. A worksheet for the department to complete on needs, services, and gaps was provided as a second example. There were no examples of strategies to improve access to care provided.*

## Domain and Standard Comments

Domain and standard comments add summation to the measure comments. Domain comments summarize the key findings in all the measures of the domain and is used to inform the Accreditation Committee of any trends or patterns identified in the documentation. The standards comments do the same with the focus on the measures within the standard.

The same principles and guidance that apply to conformity comments for a measure also apply here. Do not cut and paste together measure level conformity comments. Look for overarching elements found in the body of documentation for the domain or the standard. Then write the comments to inform the health department and the Accreditation Committee of your key findings.

Here are some sample domain comments, using Domain 1 as the example:

### *Example 1*

The health department conducted a comprehensive CHA using a broad range of data sources. During the interview with Community Partners, attendees spoke very highly of the health department's leadership in the process and the many ways the CHA served as a resource for grant proposals, for county data, and for planning.

### *Example 2*

Through the CHA and other community reports, the health departments shares current information on various public health topics. The CHA, including multiple data sources, demonstrated the ability the health department possesses to assess the population served. Recommendations that resulted from the assessment were clear and translated into attainable goals for the CHIP.

### *Example 3*

While the health department has the capacity to assess the public health status in the county, there was a lack of data. This was a weakness of documentation for the domain – the lack of comprehensive data and the lack of acknowledgment of the data source. It is difficult to see how the health department uses data to inform policy decisions, surveillance and public health programs. When data were present, the analysis done was superficial. This domain presents a tangible opportunity for improvement for the health department to improve in its analysis of data and use for their programs and activities.

### *Example 4*

The CHA provides comprehensive data and the process was inclusive of multiple partners and community groups. The CHA includes ample primary and secondary data, and provides a complete demographic picture of the county. While the CHA, and the CHIP, have been widely distributed in the community, there was no evidence that the community at large provided input to, or had a chance to review, the CHA. Data and reports are continuously reviewed for trends and patterns, which are then considered in decision making.

Here are some sample standard comments, using Standard 9.2 as the example:

*Example 1*

Involvement in QI is a new area of work for the health department. Leadership and staff support the development of a QI mindset and are seeking knowledge and training on how to best initiate this. From interviews during the site visit, the team concluded that the department is at the beginning stages of developing capacity in QI. As they become experienced in conducting and leading QI, their performance in this standard should improve. Department staff exhibited infectious enthusiasm for learning and implementing QI.

*Example 2*

The health department leadership and governing entity encourages quality improvement methods in their department. The Leadership Team participant and strive to involve all levels of personnel. They do not limit any process or program from being open to quality improvement. Their plan was the first attempt at developing a program and was missing a few required elements. However, their quality improvement initiatives and projects followed the process as spelled out in the quality plan.

*Example 3*

Overall, the documentation represented a good start in meeting the requirements of Standard 9.2. The department has had a QI plan for almost a decade but only recently revised it to include the elements of the standard and to link it to the performance management system and the strategic plan. The department has primarily done clinical quality assurance for past QI activities, so there is a lack of implementation of the newly revised plan. However, the plan does provide a good guide for moving forward.

*Example 4*

The health department has developed a quality improvement process to serve as the framework for determining benchmarks, measuring and monitoring progress, and making improvements in processes and functions. Through documentation and interviews, the department confirmed its support of the QI plan and process for improving the work of the department. Implementation is broad and improvements to departmental processes have produced immediate results.

**Checklist for Writing the Conformity Comments:**

Use the checklist when writing the comments to guide you in including the appropriate information.

- Did you explain why the measure received the score you gave it?
- Did you explain how conformity was demonstrated (or not)?
- Did you address all the examples or all of the required documentation sections in your comments?
- Did you explain what was missing, if not fully demonstrated?
- Did you keep the comment free from personal judgments and named individuals?
- Did you keep the conformity comment free of any reference to an area of excellence or an opportunity for improvement that is beyond the Standards and Measures?
- Did you refer to the health department in the same manner throughout the report, such as using their acronym?
- Did you keep the comment free of abbreviations and jargon?
- Does the content of the conformity comment match the score you gave?
- Did you avoid listing the documents that were submitted?
- Did you avoid a copy/paste of the measure and required documentation wording?
- Did you avoid a copy/paste of the health department's upload descriptions or measure narrative?
- Did you write the comments using complete sentences?