

**BAY-ARENAC BEHAVIORAL HEALTH AUTHORITY
POLICIES AND PROCEDURES MANUAL**

Chapter: 2	Continuous Quality Improvement		
Section: 3	Monitoring		
Topic: 6	Reporting and Investigation of Adverse Events		
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Policy

It is the policy of Bay-Arenac Behavioral Health Authority (BABHA) that all adverse events, such as unusual events (including risk), critical incidents (including all deaths) and sentinel events that involve harm or injury or the risk of harm or injury are reported to the Office of Recipient Rights (ORR). In addition, it is the policy of BABHA to review and respond competently and in a timely manner to the occurrence of adverse events, and to act effectively to reduce the potential for recurrence of similar adverse events in the future. Further, is the policy that all adverse events are reviewed and monitored internally by BABHA; certain events have been identified for monitoring and reporting as required by Mid-State Health Network (MSHN) and/or Michigan Department of Health and Human Services (MDHHS) and/or Commission on Accreditation of Rehabilitation Facilities (CARF).

Purpose

This policy and procedure are established to:

- Provide guidance when reporting or investigating any adverse events such as unusual events (including risk), critical incidents (including all deaths), and sentinel events that involve harm or injury or the risk of harm or injury for all persons served;
- To ensure there is a systematic and comprehensive mechanism for identifying, reporting, and analyzing any adverse event;
- To provide a process for improving performance by preventing a future similar occurrence
- To enhance the risk management capacity of the organization.
- In addition to review and document the appropriate response to all reports of adverse events, reports will be tracked, aggregated, and reviewed annually, at minimum, by organizational leadership for the purposes of effective risk management and performance improvement.

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Education Applies to:

- All BABHA Staff
- Selected BABHA Staff, as follows:
- All Contracted Providers: Policy Only Policy and Procedure
- Selected Contracted Providers, as follows:
 - Policy Only Policy and Procedure
- BABHA's Affiliates: Policy Only Policy and Procedure
- Other: Vocational Providers, Residential Providers and Club Houses

Definitions

Adverse event: An event that is inconsistent with, or contrary to, the expected outcome of the organizations functions that warrants review under this policy and procedure. Subsets of adverse events qualify as “reportable events” according to external reporting systems such as the MDHHS Event Reporting system and CARF. Adverse events include four classifications: unusual events, risk events, critical incidents, and sentinel events. The classifications separate these events based on level of risk as defined by external regulatory bodies.

Sentinel Event: An unexpected occurrence involving death or serious physical or psychological injury or risk thereof. Serious injury specifically includes loss of limb or function. The phrase ‘or risk thereof’, includes any process variation for which a reoccurrence would carry a significant chance of serious adverse outcome (CARF sentinel event definition, Behavioral Health Standards manual). Is an “unexpected occurrence” involving death (not due to the natural course of a health condition) or serious physical or psychological injury, or risk thereof. Serious injury specifically includes permanent loss of limb or function. The phrase “or risk thereof” includes any process variation for which recurrence would carry a significant chance of a serious adverse outcome (JCAHO, 1998). Any injury or death that occurs from the use of any behavior intervention is considered a sentinel event (MDHHS and MSHN Contract).

Critical Events: Events that have resulted in harm to individuals who are actively receiving services. Critical events include the following events: suicide, non-suicide death, emergency medical treatment due to injury or medication error, hospitalization due to injury or medication error, and/or arrest of a consumer. (Attachment pg. 7.9.1)

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Risk Events: Critical events that put individuals at risk of harm; these events minimally include the following: actions taken by individuals who cause harm to themselves, actions taken by individuals who cause harm to others, or two or more unscheduled admissions to medical hospital (not due to planned surgery or the natural course of a chronic illness, such as when an individual has a terminal illness) within a 12 month period. (Attachment pg. 7.9.1)

Unexpected Deaths: Include those that resulted from suicide, homicide, an undiagnosed condition, were accidental, or were suspicious for possible abuse or neglect. (Attachment pg. 7.9.1)

Near Miss: A situation in which a serious consequence was avoided however a review maybe required to promote a safer environment. (CARF Behavioral Health Standards Manual)

Root Cause Analysis (RCA): RCA or root cause, is a process for identifying the basic or causal factor(s) underlying variation in performance, including the occurrence or possible occurrence of an adverse event. A RCA focuses primarily on systems and processes, not individual performance. A RCA involves:

1. Determination of the factors (human, systems, etc.,) most directly associated with the adverse event and the associated processes.
2. Review of the underlying systems and processes to determine where redesign might reduce risk.
3. Identification of risk points and their potential contributions to this type of event.
4. Determination of potential improvement in processes or systems that would tend to decrease the likelihood of such event in the future, or a determination, after analysis, that no such improvement opportunities exist.
5. To ensure credibility, attention to internal consistency in the questions asked/unasked and consideration of the organization as a whole entity, and
6. Review of available relevant literature

Critical Events

1. Suicide Death

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2. Non-Suicide Death
3. Emergency Medical Treatment due to Injury or Medication Error
4. Hospitalization due to Injury or Medication Error
5. Arrest

Risk Events:

1. Harm to Self
2. Harm to Others
3. 911 Calls for Behavioral Assistance
4. Emergency Use of Physical Management
5. Two or more unscheduled admissions to a medical hospital not due to planned surgery or natural course of a chronic illness, such as when an individual has a terminal illness within a 12-month period.

Other Reportable Events:

1. Death occurred as result of suspected staff member action or inaction, or is subject of recipient rights, licensing, or police investigation (event notification).*
2. Every person served whose death occurred within one year of discharge from a state operated service (event notification).*
3. Relocation of a consumer’s placement due to licensing issues (event notification).**
4. An occurrence that the relocation of any CMHSP or provider panel service site, governance, or administrative operation for more than 24 hours (event verification).**
5. The conviction of a CMHSP or provider panel staff members for any offense related to the performance of their job duties or responsibilities (event notification).**

* Must notify MDHHS within 48 hours and provide the following information:

- a. Name of person
- b. Beneficiaries ID number
- c. Consumer ID if there is no beneficiary ID number
- d. Date, time and place of death (if licenses foster care facility, include the license #)
- e. Preliminary cause of death
- f. Contact person’s name and E-mail address

** Must notify MDHHS within 5 days

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Procedure

All BABHA employees, contracted service providers, or volunteers, who witness or discover an adverse event for all persons served, and if the incident occurred at a BABHA direct operated or contracted service delivery site or is otherwise related to the behavioral health status and our service delivery of the person served, will complete:

- Arrest Form for all arrests
- Death Report Form for all deaths.
- An Incident Report (IR) Form to report all other adverse events such as those noted above

Reporting Arrests (Arrest Report Form):

1. As primary responsible workers become aware of an arrest of a person served:
 - a. They will complete an arrest report form before the end of the shift in which notified, and
 - b. Send completed form to Emergency Services and the Office Recipient Rights (ORR).
2. Emergency Services Staff will review, and if appropriate, identify and act upon jail diversion opportunities.
3. The ORR sends all arrest report forms to the Quality Manager and Business Intelligence Secretary for data reporting.

Reporting and Investigating Deaths (Death Report Form):

A verbal report of all deaths and suicides **of any person receiving services by BABHA or its contracted clinical service providers, and/or receiving an emergency service within the previous 30 days shall be immediately made to the responsible Service Director, or his/her designee, the Office of Recipient Rights or designee.**

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1. The primary responsible worker (includes clinical contracted service providers) shall complete a **Death Report Form** within the electronic medical record system within 24 hours of being notified of the death or suicide, (do not wait for a death certificate) which will be automatically sent to the ORR. The BI Secretary will be notified of all completed death reports and will attach the death report to an incident report form. The Clinic Practice Manager and Quality Manager will be notified through the Phoenix system for continued processing. If it is determined that the circumstances of a death warrant an investigation, one will be initiated by the Clinic Practice Manager and/or the Quality Manager in conjunction with the Medical Director and the Healthcare Practices Committee (HPC). The death report shall include the basic information of name, case number, gender, date of birth, date and place of death, along with the name, title, and agency of the person completing the report. In addition, the report will document the following:
 - a. Diagnoses, including medical and psychiatric of the person served
 - b. Recent change in medical or psychiatric status including notations/summary statement of most recent hospitalizations
 - c. Summary of condition and treatment (programs and services being provided to the person served preceding death)
 - d. Medications prescribed by a Psychiatric Professional within the last 30 days
 - e. Any other relevant history and
 - f. Death certificate (added as an attachment after received from the Medical Examiner)

Death certificates must be obtained, scanned to the medical record and attached to the death report under the oversight of the Clinic Practice Manager.
2. The death report will be reviewed by the ORR to determine if a recipient rights investigation is warranted and inform the CEO if an investigation is being conducted.
3. If the ORR determines that an investigation is warranted, then the death will be documented on a Recipient Rights Complaint and the investigation will proceed through the Recipient Rights investigative process. ORR will notify the Quality Manager for immediate notification (electronically within 48 hrs.) to MDHHS.

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4. All Death Reports will be reviewed at the HPC meeting. The Medical Director will make a determination if the death was accidental, expected or unexpected and if not already determined, if a RCA is required.
5. If the BABHA Medical Director is the primary provider involved, an alternated designated physician will make determinations if the death was accidental, expected or unexpected.
6. The Clinic Practice Manager and Quality Manager will complete the Death Determination Review of the Death Report and all appropriate staff will be notified, including, primary staff, Medical Director, and CEO.

Reporting Risk and Critical Incidents (IR Form):

1. Upon notification of an incident involving a person served assigned to them, primary care managers (i.e., the Primary Care Worker or Therapist) who are employees of BABHA will:
 - a. If apparent serious injury, abuse or neglect has occurred, provide verbal notification to the applicable supervisor or designee and upon verbal notice of the incident, the supervisor or designee will notify the appropriate Director, the Recipient Rights Officer, within 24 hours of notification.
 - b. If the incident was a risk, critical, or sentinel event, as defined in this procedure, immediately notify their supervisor, or in their supervisor's absence, their designee. The supervisor or designee is responsible for informing the Director of Integrated Services and the Quality Manager, if appropriate.
 - c. Primary care workers will document actions taken in response to incidents via progress notes or periodic reviews, without referencing the incident report itself.
2. For all adverse events, including risk, critical, and sentinel (as defined above), an Incident Report (IR) form will be completed by the person who observed the incident no later than the end of the shift of when they observed the incident. The staff person will forward a copy to their supervisor and appropriate Director and send the original faxed copy to the Office of Recipient Rights (ORR) within 24 hours. The ORR will initiate action from the original faxed copy of the incident report form received.

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3. All BABHA employees who are informed of a risk/critical incident observed by someone else, are responsible for ensuring the incident was reported as required in the procedure above if the incident occurred at a BABHA direct operated or contracted service delivery site or is otherwise related to the behavioral health status and our service delivery of the person served.
4. When two or more BABHA employees, contracted service providers, or volunteers witness an incident requiring an IR form completion, one form shall be filed and signed by all the personnel involved. Any personnel unwilling to sign the report for whatever reason may choose to file a separate report. Names of the witnesses and others present shall be included in the report(s). Initials or case numbers will be used for people served witnessing the incident.

Investigation of Adverse Events:

1. Identification: All adverse events, including, but not limited to, risk events, critical incidents (including all deaths) and sentinel events for all persons served will be reviewed.
 - a. The Quality Manager will be notified of adverse events that are potential sentinel events upon receipt. Since root cause analysis is a mandatory function of the Quality Assessment and Performance Improvement Program (QAPIP), the determination whether a root cause analysis is required will be initiated by the BABH Quality Manager but made in consultation with key members of the HPC including the Medical Director as subject matter experts and critical stakeholders. At a minimum, sentinel events, as defined in the MDHHS contract, must be reviewed and acted upon as appropriate, with determinations occurring within three days of critical incidents, and root cause analyses for sentinel events commencing within two subsequent business days of the sentinel event determination.
 - b. Events of significance will be reviewed by the HPC to determine if an investigation of the event is warranted.
2. Analysis: All risk, critical, and sentinel events will be reviewed to determine if the event is related to the practice of care and whether the performance of a root cause analysis is warranted.

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- a. If determined to be appropriate, a RCA will be conducted in a timely and thorough manner. The Clinic Practice Manager or Quality Manager will be assigned lead responsibility for ensuring the completion of each RCA and any action plan. The RCA will be initiated within two business days of the occurrence of the event and completed not more than 30 days after knowledge about the event. The RCA will be completed based upon the Tool/Guide to Assist Behavioral Health Care in the Completion of a Root Cause Analysis and the Framework to Assist Behavioral Health Care in the Completion of a Root Cause Analysis as attached to this policy and procedure.
 - b. Persons involved in the review of events will have appropriate credentials to review the scope of care. For example, events that involve a death of a person served or other serious medical conditions will involve a physician or nurse.
3. Action Planning and Follow-Up: The goal of reviewing adverse events will be to focus the attention of the organization on potential underlying causes of the event so that changes can be made in systems or processes in order to reduce the probability of such an event in the future. Following completion of a RCA or investigation, BABHA will develop and implement either a plan of action or intervention to prevent further occurrence of the sentinel event; or document the rationale for not pursuing an intervention. The plan will address responsibility for implementation and oversight, pilot testing as appropriate, timelines, and strategies for measuring the effectiveness of the actions.
- a. An action plan will be developed by the staff completing the RCA, which will require approval by the HPC. The action plan will include timeframes, and responsible parties.
 - b. The Medical Director for BABHA will review and approve any RCAs, along with the HPC.
 - c. The HPC will monitor the completion and effectiveness of action plans with a tracking tool.
 - d. Debriefing following clinical emergency situations:
 - i. The appropriate staff from the treating clinical team and the Medical Director as well as other individuals from BABHA’s HPC will be involved in the debriefing process.
 - ii. Documentation of the debriefing will be part of the HPC meeting minutes.
 - iii. In addition to the debriefing, staff who are part of the treatment team (clinical or administrative) will be given the opportunity for individualized debriefing through

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the BABHA employee assistance program. The clinic site supervisor will be responsible for coordinating the necessary resources to provide debriefings.

Review of Adverse Events:

An annual summary of aggregate-level fiscal year adverse events is reviewed by the BABHA HPC and applicable leadership before the end of the calendar year. This summary contains information on: 1) causes; 2) trends; 3) actions for improvement; 4) results of performance improvement plans; 5) necessary education and training of personnel; 6) prevention of recurrence; 7) internal reporting requirements; and 8) external reporting requirements.

Record Keeping and Reporting:

BABHA will maintain a system for recording the occurrence of events and the organization's analysis, action planning and follow-up. Periodically, or at least annually, formal reporting will occur via the HPC to appraise the organization's leadership and governance concerning the management of the event and all efforts to improve and correct underlying causes.

1. Adverse events will be reported to the PIHP/MDHHS and CARF, BABHA's accrediting body, as required.
 - a. MDHHS Event Notification: Events identified to fall under Event Notification for immediate reporting to MDHHS. This report shall be submitted electronically within 48 hours of either the death, or the CMHSP's receipt of notification that rights, licensing, and/or police investigation has commenced to QMPMeasures@michigan.gov
 - b. Regional Reporting Process: If the adverse event is determined to be reportable based on event type, services, or living situation, the Performance Improvement Coordinator will report to MSHN any and all reportable events prior to the end of each month or as required by MSHN.
 - c. Accrediting Body Reporting Process: Significant events, including sentinel events as defined by CARF, that involve or may affect accredited programs and the organization's response to these events must be communicated to CARF within 30 days of their occurrence (Behavioral Health Standards Manual).

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Additional Information Regarding Adverse Event Reporting and Records:

1. All BABHA employees, contracted service providers, and volunteers, shall also adhere to any additional reporting requirements of 1982 Public Act 519, Adult Protective Service Act, 1975 Public Act 238, as amended, Child Protection Act, and 1988 Public Act 32, Mandatory Report Abuse Act.
2. BABHA employees of some programs and some contracted service providers (e.g., residential services and children’s programs) should familiarize themselves with applicable procedures for reporting certain types of incidents to the appropriate licensing or regulatory bodies (MDHHS, OSHA, etc.). In order to avoid duplicate documentation, it is acceptable to complete the required licensing or regulatory body report and submit it to that agency, with a copy of that report attached to a blank IR form and submitted in accordance with this policy.
3. Report Retention:
 - a. The original of the completed/signed IR form will be retained in the home or program where the incident occurred.
 - b. The copy of the IR form faxed to the Office of Recipient Rights (ORR) will be maintained by the ORR for a set period as determined by the Recipient Rights Officer.
 - c. An IR form generated pursuant to MCL 330.1143a does not constitute a summary report as intended by this section and shall not be maintained in the clinical record of a people served. Incident report forms will NOT be stored in BABHA clinical records.
4. Confidentiality:
 - a. Failure to treat an IR form in a confidential manner, such as circulation to persons without a need to know, will result in appropriate disciplinary action toward the staff that breached the confidentiality of the document.
 - b. All records, data and knowledge, including minutes collected for or by individuals or committees assigned a quality assurance function are confidential, are not public record, and therefore:

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- i. Do not appear in the record of the person served,
 - ii. Are not subject to court subpoena pursuant to MCL, 333.20175(8), and
 - iii. Disclosure or duplication outside of indicated procedures is prohibited.
- a. Clinical staff documenting in a clinical record regarding actions taken in response to an incident shall not cite (document) or otherwise reference an incident report, in order to ensure the incident report remains fully separate from the clinical record.

Attachments

- Tool/Guide to Assist Behavioral Health Care in the Completion of a Root Cause Analysis
- Framework to Assist Behavioral Health Care in the completion of a Root Cause Analysis
- Adverse Event Project Description

Related Forms

- Arrest Report Form- (Master Clinical Files)
- Death Report Form (EHR)
- Incident Report (IR) Form-(Intranet)
- HPC Event Response Form (G:\BABH\Death Reports\HPC Forms)

Related Materials

- Mid-State Health Network (MSHN) Critical Incident Policy

References/Legal Authority

Commission on Accreditation for Rehabilitation (CARF) Michigan Department of Community Health (MDCH) Medicaid managed Specialty Support and Services contract Attachment P.6.7.1.1; Attachment 6.5.1.1

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SUBMISSION FORM				
AUTHOR/ REVIEWER	APPROVING BODY/COMMITTEE/ SUPERVISOR	APPROVAL /REVIEW DATE	ACTION (Deletion, New, No Changes, Replacement or Revision)	REASON FOR ACTION - If replacement list policy to be replaced
M. Bartlett/K. Lane	PNLT	5/20/13	New	New
S. Gettel/A. Folsom	J. Pinter/HPC	3/18/15	Revision	Combined the following policies and procedures: <u>C03-S04-T01 Reporting Unusual Incidents</u> – Policy Supersedes Date: 1-21-03; Procedure Supersedes Dates: 12-20-11, 5-6-10, 9-23-09, 2-10-09, 11-20-08, 9-15-08, 3-11-08, 11-16-04, 1-20-04, 10-21-03, 1-21-03, 1-6-01, 12-19-91. <u>C03-S04-T02 Death Reporting</u> – Policy Supersedes Dates: 9-16-04, 8-19-99; Procedure Supersedes Dates: 12-20-11, 1-15-11, 8-27-09, 1-23-09, 11-19-08, 9-15-03, 2-14-05, 8-17-04, 5-26-00, 3-18-99. <u>C03-S06-T01 Investigation of Incidents and Sentinel Events</u> – Policy Supersedes Dates: 10-16-08, 3-16-02, 7-16-98; Procedure Supersedes Dates: 1-20-11, 5-13-09, 4-21-09, 11-11-08, 10-16-08, 4-24-08, 1-20-04, 10-21-03, 4-16-01, 7-29-98. Policy <u>C03-S04-T01</u> was deleted. <u>C02-S03-T06 Reporting and Investigation of Adverse Events</u> supersedes dated 3-18-2015.
S. Holsinger/A. Folsom	J. Pinter/HPC	5/29/20	Revision	Updated to current language and practice.
S. Holsinger	J. Pinter/HPC	7/7/21	Revision	Updated to current language. Revised the reporting process of arrests. Revised language to update the process of using the death report form and how it is routed to the correct staff.
S.Holsinger	K.Amon	1/22/24	Revision	Updated language to be more specific on event descriptions. Revised reporting process due to changes. Formatting changes.