

**NORTH COUNTRY COMMUNITY MENTAL HEALTH
NORTHERN AFFILIATION
ADMINISTRATIVE MANUAL**

CHAPTER: Affiliation, Chapter 6
PROCEDURE NAME: Sentinel Events
PROCEDURE NUMBER: 6004

POLICY

All North Country Community Mental Health, Northern Affiliation provider entities will comply with the Sentinel Event Policy of the Joint Commission on Accreditation of Health Care Organizations.

PURPOSE

The Northern Affiliation has developed a process by which sentinel events will be reported to the managing entity and processed locally. This process ensures due diligence by the managing entity, while protecting the confidential nature of sentinel events.

DEFINITIONS

Incident is any of the following which should be reviewed to determine whether it meets the criteria for sentinel event, as defined below:

- death of a service recipient,
- serious illness requiring admission to a hospital,
- alleged case of abuse or neglect,
- injury from accident or abuse to the recipient requiring emergency room visit or admission to a hospital,
- serious challenging behavior,
- arrest and/or conviction, or
- medication error.

Sentinel Event is an “unexpected occurrence involving death or serious physical or psychological injury, or the risk thereof. Serious injury specifically includes loss of limb or function. The phrase, ‘or risk thereof’ includes any process variation for which a recurrence would carry a significant chance of a serious adverse outcome.”

24 hour Specialized Setting means a specialized residential home certified by the Michigan Department of Human Services to serve persons with mental illness or developmental disabilities. For purposes of sentinel events reporting by Substance Abuse Coordinating Agencies, it means substance abuse residential treatment programs.

Own Home for purposes of sentinel event reporting means supported independence programs for persons with mental illness or developmental disabilities regardless of who holds the deed, lease, or rental agreement; as well as own home or apartment for which the consumer has a deed, lease, or rental agreement in his/her own name. Own home does not mean a family’s home in which the child or adult is living.

Ongoing and continuous in-home assistance means assistance with activities of daily living provided in the person’s own home at least once a week, and for six months or longer.

Death: that which does not occur as a natural outcome to a chronic condition (e.g. terminal illness) or old age.

Injuries occurring as a result of accidents or abuse which required visits to emergency rooms, medical centers and urgent care clinics and/or admission to a hospital should be included in the injury reporting. In many communities where hospitals do not exist, medical centers and urgent care clinics are used in place of hospital emergency rooms.

Physical illness resulting in admission to a hospital does not include planned surgeries, whether inpatient or outpatient. It also does not include admissions directly related to the natural course of the person's chronic illness, or underlying condition. For example, hospitalization of an individual who has a known terminal illness in order to treat the conditions associated with the terminal illness is not a sentinel event.

Serious challenging behaviors are those not already addressed in a treatment plan and include significant (in excess of \$100) property damage, attempts at self-inflicted harm or harm to others, or unauthorized leaves of absence. Serious physical harm is defined by the administrative rules for mental health (330.7001) as "physical damage suffered by a recipient that a physician or registered nurse determines caused or could have caused the death of a recipient, caused the impairment of his or her bodily functions, or caused the permanent disfigurement of a recipient."

Arrest and/or Convictions are any arrest or conviction that occurs with an individual who is in the reportable population at the time the arrest or conviction takes place.

Medication Errors mean a) wrong medication; b) wrong dosage; c) double dosage; or d) missed dosage, that resulted in death or serious injury or the risk thereof. It does not include instance in which consumers have refused medication.

APPLICATION

All Northern Affiliation services providers, whether a CSSN, contract provider, or subcontract providers.

PROCEDURES

- I. When a provider becomes aware of an adverse incident, the provider will first ensure the safety and comfort of the person(s) involved to the extent possible.
- II. The provider will consult the definition above to determine if the adverse incident was a sentinel event. A sentinel event is an unexpected occurrence involving death or serious physical or psychological injury, or the risk thereof.
- III. If a sentinel event has not occurred, the provider will utilize its own policies and procedures to address the situation.
- IV. If a sentinel event has occurred, the provider will report the incident to the Northern Affiliation within five (5) calendar days of occurrence (or within five days of learning of the incident) on the Northern Affiliation Sentinel Event Report form. The form will be faxed to the Northern Affiliation to the attention of the Service Quality and Innovation Manager.
- V. In order to understand how and why the event occurred, the provider or a responsible party determined by the Northern Affiliation will conduct a credible and thorough root cause analysis that meets the Joint Commission's specifications for root cause analysis as described in the Joint Commission's publication: *Conducting a Root Cause Analysis in Response to a Sentinel Event* (1996). The root cause analysis will commence within two business days of the occurrence or the provider learning of the occurrence, and will be completed within sixty (60) calendar days of the occurrence (or provider knowledge of the occurrence). The root cause analysis will be conducted by an appropriately constituted group of individuals. The analysis will be lead by an individual trained in conducting root cause analyses. The group membership shall include appropriately credentialed individuals for the scope of care involved, for example, if reviewing a death or serious injury, at least one member of the group will be a physician or nurse.
- VI. The provider or party responsible for conducting the root cause analysis will complete the Northern Affiliation Sentinel Event Follow-up Form and within three (3) calendar days the

completed form will be sent to the Northern Affiliation for inclusion in the Sentinel Event File.

- VII. During annual site reviews the Northern Affiliation will confirm that the provider has taken appropriate and timely actions as specified on the Sentinel Event Follow-up Form in order to prevent the same or similar events from occurring in the future.

DISTRIBUTION:

REVISED: December, 2005; January 2009

APPROVED: January 25, 2006

