

The Right Door for Hope, Recovery and Wellness

Chapter Title	Section #		Subject #
Clinical	C		392
Subject Title Sentinel Events	Adopted 11/22/04	Last Revised 10/19/20	Reviewed: 2/21/06; 2/26/07; 2/23/09; 1/25/10; 1/24/11; 1/23/12; 4/22/13; 4/28/14; 3/23/15; 3/28/16; 03/27/17;3/26/18; 6/24/19; 7/22/19; 8/24/20; 9/28/2020; 10/19/20; 11/23/20; 11/22/21; 10/30/23; 10/28/24; 10/20/25

POLICY

Application

This policy shall apply to staff and contractual providers of The Right Door for Hope, Recovery and Wellness.

1. INTENT

It is the intent of this policy to ensure that the organization identifies, reports and responds appropriately to all sentinel events occurring in the organization or associated with services the organization provides.

2. DEFINITIONS

2.1. Actively receiving services: For the sake of Critical Incident reporting, a person served is considered to be actively receiving services when any of the following occur:

2.1.1. A face-to-face intake has occurred, and the individual was deemed eligible for ongoing services, or:

2.1.2. The CMHSP has authorized the individual for ongoing service, either through a face-to-face assessment or a telephone screening, or:

2.1.3. The individual has received a non-crisis, non-screening encounter.

2.2. Time frame of actively receiving services: The period during which the person served is considered to be actively receiving services shall take place between the following begin date and end date inclusively:

2.2.1. Begin Date: Actively receiving services begins when the decision is made to start providing ongoing non-emergent services.

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Specifically, the beginning date shall be the first date that any of the 3 conditions reference above occurs.

2.2.2. End Date: When the person served is formally discharged from services. The date the discharge takes effect shall be the end date. This should also be the date that is supplied to the person served when the person served is notified that services are terminated.

2.3. Sentinel Event: An unexpected occurrence involving death (not due to the natural course of a health condition) or serious physical or psychological injury, or the risk thereof. Serious injury specifically includes loss of limb or function. The phrase “or the risk thereof” includes any process variation for which a recurrence would carry a significant chance of a serious adverse outcome. Any injury or death that occurs from the use of any behavior intervention is considered a sentinel event. Such events are called sentinel because they signal the need for immediate investigation and response.

2.4. Root Cause Analysis (or Investigation): A process for identifying the basic or causal factor(s) that underlie variation in performance, including the occurrence or possible occurrence of a sentinel event. A root cause analysis focuses primarily on systems and processes.

2.5. Immediately: As soon as one is able to safely alert the agency of the incident. Immediate reporting can be made via phone or secure email and followed up with the written incident report.

3. IDENTIFYING SENTINEL EVENTS – MDHHS

3.1. Critical Incidents: Incidences that meet the following criteria are reviewed as sentinel events and are subsequently reported to MDHHS per reporting requirements:

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3.1.1. The individual falls within the definition of MDHHS Reportable Population, and;

3.1.2. The incident meets the definition of a sentinel event, and;

3.1.3. The incident falls within one the following categories:

3.1.3.1. Suicides by any person served actively receiving services or who received an emergent service within the last 30 calendar days.

3.1.3.2. Non-Suicide Deaths by persons served who were actively receiving services at the time of their death and met any one of the two following conditions:

3.1.3.2.1. Living in a specialized residential or child caring institution, or:

3.1.3.2.2. Receiving any of the following:

3.1.3.2.2.1. Community living supports

3.1.3.2.2.2. Supports coordination

3.1.3.2.2.3. Targeted case management

3.1.3.2.2.4. ACT

3.1.3.2.2.5. Home based

3.1.3.2.2.6. Wraparound

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3.1.3.2.2.7. Habilitation Supports Waiver (HSW)

3.1.3.2.2.8. Serious Emotional Disturbance Waiver (SEDW)

3.1.3.2.2.9. Child Waiver Services (CWS)

3.1.3.3. Emergency Medical Treatment due to injury or medication errors. Report persons served who, at the time of event, were actively receiving services and met any one of the following two conditions:

3.1.3.3.1. Living in a 24-hour specialized residential setting (per the Administrative Rule R330.1801-09) or in a child caring institution, or:

3.1.3.3.2. Receiving Habilitation Supports Waiver services, SED Waiver services or Child Waiver services.

3.1.3.4. Hospitalization due to injury or medication errors by persons served who, at the time of the event, were actively receiving services and met any one of the following two conditions:

3.1.3.4.1. Living in a 24-hour specialized residential setting (per the Administrative Rule R330.1801-09) or in a child caring institution, or:

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3.1.3.4.2. Receiving Habilitation Supports Waiver services, SED Waiver services or Child Waiver services.

3.1.3.5. Arrests of persons served who, at the time of the arrest, were actively receiving services and met any one of the following two conditions:

3.1.3.5.1. Living in a 24-hour specialized residential setting (per the Administrative Rule R330.1801-09) or in a child caring institution, or:

3.1.3.5.2. Receiving Habilitation Supports Waiver services, SED Waiver services or Child Waiver services.

3.2. Methodology and Instructions: Methodology and instructions for reporting are posted on the MDHHS website at www.michigan.gov/mdhhs. Click on "Mental Health and Substance Abuse", then "Reporting Requirements", then "Other Resources".

4. IDENTIFYING SENTINEL EVENTS – CARF

5. Incidences meeting the following criteria are subject to review by the Commission on Accreditation of Rehabilitation Facilities (CARF): An unexpected occurrence within a CARF-accredited program 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. Such events are called Sentinel because they signal the need for immediate investigation and response.

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6. REPORTING AND INVESTIGATION

- 6.1. Procedures shall assure all suspected, alleged or actual sentinel events shall be reported immediately to appropriate personnel.
- 6.2. The incident will be reviewed to determine if it meets the MDHHS or CARF definition of a sentinel event and appropriate analysis/investigation and action planning will be initiated.
- 6.3. All incidences determined to be a sentinel event shall be reported to state and local authorities as required by law. All occurrences determined to be a sentinel event according to MDHHS and/or CARF criteria shall be reported to MDHHS and/or CARF according to their reporting requirements and as permissible by law.

References:

CARF Standards Manual

MDHHS/CMHSP Managed Mental Health Supports and Services Contract, Management Information/Reporting Requirements.

Nancy Patera, Board Chairperson	Date		