

Great Rivers Behavioral Health Organization

Policy Title:	Incident Reporting	Policy No. 6011.01
Category:	Contract Compliance	Date Adopted: 05/13/2016
		Revision Date: 03/08/2019
Reference:	Washington Department of Health (DOH) Washington State Health Care Authority (HCA) Contract with Great Rivers Behavioral Health Organization Washington Administrative Code 182-538D, 246-341	

Policy:

- 1.1. Great Rivers Behavioral Health Organization (Great Rivers) shall follow the Incident Reporting Requirements outlined in the Great Rivers agreements with the Washington State Health Care Authority (HCA) and requirements under the Washington Administration Codes (WAC).
- 1.2. Great Rivers will utilize the Quality Manager or designee as the designated Incident Manager whose role is to:
 - 1.2.1. Screen incident reports for appropriateness;
 - 1.2.2. Ensure an incident review/investigation is completed;
 - 1.2.3. Follow-up with each review/investigation until a disposition is reached for each;
 - 1.2.4. Report critical incidents (CIs) including investigation, follow-up activities, and dispositions regarding BHO related incidents using the State's Incident Reporting System;
 - 1.2.5. Ensure aggregate incident data is reviewed as a quality management measure and at the Great Rivers Quality Committee; and
 - 1.2.6. Ensure each contracted/subcontracted Behavioral Health Agency (BHA) establishes and maintains policies and procedures for incident reporting, which include timely reporting to Great Rivers.
- 1.3. Great Rivers shall ensure all providers who serve Great Rivers funded individuals understand they are included in the requirement to report incidents and must make reports to Great Rivers.
- 1.4. Providers may also have other legally mandated reporting requirements related to an incident (e.g. child or adult protective service laws, as a condition of licensing, or Medicaid Fraud Control Unit). Reporting incidents to Great Rivers will not relieve providers of any other reporting obligations.

Incident Reporting Categories:

- 2.1. **"Incidents"** are actual or alleged events, situations, or conditions that pose a significant immediate and/or ongoing risk of substantial or serious harm to the physical or mental health, safety, or well-being of an individual. Incidents also include the actual or alleged misappropriation of an individual's funds, property, or unexpected, and unusual adverse environmental conditions that pose serious danger to the provision services or operation of business. An "incident" is an actual or alleged event, situation, or condition for any individual that received at least one service within 365 calendar days prior to the date of the incident. Great Rivers may require an agency to report on incidents that involve Individuals who have received services from the agency more than 365 calendar days prior to the incident upon request.

- 2.2. **“Critical Incidents”** (CIs) are incidents that are considered critical, active, ongoing, and that places an individual or agency at high risk. CIs include specific types of incidents that will be reported to HCA and are defined in contract as a Category One or Two Incident.
- 2.3. Incident Categories: There are three categories of incidents: Category One, Category Two, and Category Three. When an incident occurs, the descriptions in the reporting categories should be utilized to determine reporting requirements. Incidents that fall outside of the category descriptions may be reported and shall be reported at the request of Great Rivers. Professional judgment is required for reports that fall outside of the scope of these categories.
- 2.3.1. **Category One** incidents include:
- 2.3.1.1. Death of an individual, staff or public citizen at a facility that Great Rivers contracts with or certifies individuals for (e.g.: psychiatric hospital, Evaluation and Treatment centers (E&T) Crises Stabilization Units (CSU), etc).
 - 2.3.1.2. Unauthorized leave of an individual from an Evaluation and Treatment centers (E&T), Crises Stabilization Units (CSU), or Triage Facilities that accept involuntary Individuals;
 - 2.3.1.3. Any event at a facility contracted with Great Rivers or that Great Rivers certifies individuals for involving a bomb threat or active shooter.
 - 2.3.1.4. Any event involving an individual, contracted BHA or a BHA staff person that has attracted media attention.
 - 2.3.1.5. Any of the following violent acts allegedly committed by an individual:
 - 2.3.1.5.1. Arson
 - 2.3.1.5.2. Assault Resulting in Serious Bodily Harm
 - 2.3.1.5.3. Attempted Homicide by Abuse
 - 2.3.1.5.4. Attempted Murder
 - 2.3.1.5.5. Drive By Shooting
 - 2.3.1.5.6. Extortion
 - 2.3.1.5.7. Homicide by Abuse
 - 2.3.1.5.8. Indecent Liberties
 - 2.3.1.5.9. Kidnapping
 - 2.3.1.5.10. Manslaughter
 - 2.3.1.5.11. Murder
 - 2.3.1.5.12. Rape
 - 2.3.1.5.13. Robbery
 - 2.3.1.5.14. Sexual Assault
 - 2.3.1.5.15. Vehicular Homicide
- 2.3.2. **Category Two** incidents include:
- 2.3.2.1. Any serious injury of an individual requiring medical intervention that takes place a facility that Great Rivers contracts with or for which Great Rivers certifies individuals.
 - 2.3.2.2. Alleged abuse or neglect of an individual receiving services, that is of a serious or emergency nature, by an employee, volunteer, licensee, contractor, or another individual receiving services. For definition of abuse/neglect reference

- WAC 246-16 or its successor regarding reporting of mandatory abuse, neglect or exploitation consistent with Chapter 26.44 and 74.34 RCW or any successor;
- 2.3.2.3. Any error in medication administration to an individual at a facility that Great Rivers contracts with or certifies individuals for, resulting in adverse effects for the individual requiring urgent medical intervention.
- 2.3.2.4. A substantial threat to facility operation or individual safety resulting from a natural disaster (to include earthquake, volcanic eruption, tsunami, fire, flood, an outbreak of communicable disease, etc.);
- 2.3.2.5. Any breach or loss of Individual data in any form that is considered as reportable in accordance with the Health Insurance Portability and Accountability Act (HIPAA);
- 2.3.2.6. Any allegation of financial exploitation as defined in RCW 74.34.020;
- 2.3.2.7. Any attempted suicide that takes place at a facility that Great Rivers contracts with or for which Great Rivers certifies individuals.
- 2.3.2.8. Any event involving an individual or a staff member likely to attract media attention;
- 2.3.2.9. Any event involving a credible threat of harm towards a staff member. A credible threat is "A communicated intent (veiled or direct) in either words or actions (including via social media) of intent to cause bodily harm and/or personal property damage to the individual, staff member, or staff member's family, which resulted in a report to Law Enforcement, a Restraining/Protection order, or a workplace safety/personal protection plan";
- 2.3.2.10. Any incident that was referred to the Medicaid Fraud Control Unit by the BHA or its Subcontractor.
- 2.3.3. **Category Three** incidents include:
 - 2.3.3.1. All deaths where the possible relationship to mental illness or substance use or treatment(s) cannot reasonably be initially ruled out. This may include death initially ruled as natural or accidental by a medical examiner/coroner.
 - 2.3.3.2. Suicide, regardless of location;
 - 2.3.3.3. Any serious suicide attempt or an individual causing serious bodily harm that requires the individual to be *admitted* for medical attention, regardless of location;
 - 2.3.3.4. Any rights violation, including any form of restraint or seclusion used as a means of coercion, discipline, convenience, or retaliation.
 - 2.3.3.5. Any incident related to mental illness or substance use, and/or their treatment in the professional judgment of the Incident Manager.

Incident Notification and Reporting Procedures:

3.1. BHA Incident Notification

- 3.1.1. BHAs must complete notification to Great Rivers per the Incident Category requirements.
 - 3.1.1.1. Category One: The BHA must notify the Great Rivers Incident Manager by telephone or email **immediately** upon becoming aware of the occurrence of any Category One incidents involving any individual that received at least one (1) service within 365 calendar days prior to the date of the incident. Notifications must include the names of individuals involved as well as a brief description of the incident.

- 3.1.1.2. Category Two: The BHA must notify the Great Rivers Incident Manager by telephone or email *within one (1) business day* of becoming aware of any Category Two incidents involving any individual that received at least one (1) service within 365 calendar days prior to the date of the incident. Notifications must include the names of individuals involved as well as a brief description of the incident.
- 3.1.1.3. Category Three: The BHA must notify the Great Rivers Incident *Manager within five (5) business days* of becoming aware of any Category Three incidents involving any individual received at least one (1) service within 365 calendar days prior to the date of the incident. Notifications must include the names of individuals involved as well as a brief description of the incident.
- 3.1.2. Notification should be given to the Great Rivers Incident Manager, and at least one other Great Rivers staff. For Category One incidents the other staff must be the Great Rivers Chief Clinical Officer or the Great Rivers Chief Executive Officer. If a party can be reached directly, Great Rivers main line should be contacted for direction.

3.2. BHA Incident Reporting

- 3.2.1. All Notifications must be followed by a written report to Great Rivers using Great Rivers Incident Report Form according to the reporting timelines found in this policy and on the form. **Section A** of the Great Rivers BHO Incident Report Form shall be completed and submitted to Great Rivers BHO *within one (1) business day* of identification/ awareness of an incident for Category One and Two and *within (5) business days* of identification/awareness of an incident for Category Three.
- 3.2.2. BHAs shall provide a comprehensive review of all incidents to Great Rivers using the Incident Report Form. **Section B** of the Great Rivers BHO Incident Report Form shall be completed and submitted to Great Rivers BHO *within (30) thirty business days* of identification/ awareness of incident.
 - 3.2.2.1. If an autopsy is performed and the outcome changes the BHA's report, the BHA must complete a revised Part B report of the incident that reflects the medical examiners information within (90) ninety days of the incident.
- 3.2.3. Incident forms must be submitted to Great Rivers through a secure method (secure file transfer, secure email, or fax) and have date of submission indicated.
- 3.2.4. BHAs shall provide the Incident Report form to Great Rivers ensuring each section of the form is complete and accurate. Great Rivers may require BHAs to provide additional information about the report in order to complete the BHO's incident review.
- 3.2.5. Great Rivers will not close an incident unless all relevant follow-up information has been received by Great Rivers, including, a complete Section B that includes a description of action steps the BHA has taken or will take to mitigate the circumstances and, if applicable, how it will prevent similar incidents from occurring in the future.

3.3. Incident reports regarding multiple individuals

- 3.3.1. Incident reports are always person specific. If an incident involves or affects multiple individuals served and funded by Great Rivers, a separate report must be submitted for each individual affected by the incident. For example, if a staff person abused one individual in a group, one report is required. If that staff person abused three people in the same group, three reports are required, one for each individual. Each report would describe the incident and the effect the incident had on the specific individual as well as the current status of the individual named in the report. Steps to minimize harm to the individual will be specific to the individual named in the report, etc.

3.4. Reports of Incidents made involving individuals served at multiple agencies

- 3.4.1. If an incident occurs in relation to an individual who is involved with more than one type of service (such as mental health, crisis, and/or substance use disorder treatment), only one incident report notification is required per incident.
- 3.4.2. The BHA that first becomes aware of the incident is responsible for completing the notification and Part A of the incident report unless, by mutual agreement, a more appropriate BHA takes responsibility for completing the notification or report. This might be the case, for example, where the incident has a direct or obvious relationship to, and impacts on, the delivery of a particular type of service.
- 3.4.3. If the BHA that first becomes aware of the incident is not the lead BHA with prime responsibility for the individual's services, then the informed BHA must ensure that the lead BHA, where known, is notified. Together BHAs are to determine who will take responsibility for completing Part B of the incident report.

3.5. Reports of Incidents made by persons outside of serving BHAs

- 3.5.1. Individuals, family members of individuals, allied providers, or any other persons may initiate reports of incidents as needed.
- 3.5.2. When information about an incident is received from any person other than a BHA, the provider receiving the information completes and submits the applicable Part A incident report form and submits it to the Great Rivers Incident Manager.
- 3.5.3. The Incident Manager will notify the pertinent BHA of the submission, usually by giving them a copy of the report.
- 3.5.4. The notified BHA has responsibility for initiating a review of the incident and completing Part B of the incident report to submit to the Great Rivers Incident Manager within 30 business days of notification of the incident.

3.6. BHO Incident Reporting

- 3.6.1. Great Rivers will report incidents involving individuals who have received at least one service within 365 calendar days to the State using the Incident Reporting System, available online at <https://fortress.wa.gov/dshs/mhdirhrsa/Login.aspx>.
- 3.6.2. **Category One:**
 - 3.6.2.1. Great Rivers will notify the State by email or telephone of Category One incidents immediately upon becoming aware of their occurrence. Great Rivers will provide names of all individuals involved and a brief description of the incident.
 - 3.6.2.2. Great Rivers will submit a formal report through the Incident Reporting system within one (1) business day.
- 3.6.3. **Category Two:**
 - 3.6.3.1. Great Rivers will notify the State through the Incident Reporting System within one (1) business day of becoming aware of the occurrence.
- 3.6.4. **Resolution and Closure:**
 - 3.6.4.1. Great Rivers will resolve and close all incident reported to the State within 45 business days after the incident was first reported.

BHO Incident Quality Review:

- 4.1. Great Rivers shall perform a quality review of selected incidents.
- 4.2. Quality reviews shall generally occur after the BHA's review has been completed by may occur immediately following the incident.

- 4.3. Great Rivers may contact the BHA to help facilitate any administrative review(s) deemed necessary by Great Rivers. BHAs shall cooperate fully with such requests and shall provide documents and information to facilitate any investigation.
- 4.4. Quality reviews shall focus on the safety of clinical care and services provided to individuals within the Great Rivers' network. Review will also focus on the quality of the BHA's internal review, and may extend to a review of a BHA's policy and/or practice.
- 4.5. Quality reviews may result in recommendations or requirements for corrective action. The BHA shall ensure that all plans for corrective action are implemented, whether imposed by Great Rivers or the BHA's own Incident Review Committee.

POLICY SIGNATURE

Edna J. Fund, Chair
Great Rivers Governing Board

Date