

## POLICIES AND PROCEDURE MANUAL

Chapter:	Quality			
Title:	Sentinel Events			
Policy: ⊠	Review Cycle: Biennial	Adopted Date: 07.07.2020	Related Policies: Critical Incident Policy	
Procedure: ☐ Page: 1 of 2	Author: Quality Improvement Council, Quality Manager	Review Date: 03.04.2025	Incident Review for Substance Use Providers Policy	

**Purpose:** To ensure that the Mid-State Health Network (MSHN) pre-paid inpatient health plan is in compliance with the Michigan Department of Health and Human Services (MDHHS), Medicaid Managed Specialty Supports and Services Contract, Quality Assessment and Performance Improvement Plan related to Sentinel Event Reporting.

**Policy:** MSHN delegates responsibility to its Provider Network, with oversight and monitoring by MSHN, for collecting, analyzing and reporting to MSHN all incidents that meet the criteria as specified in the MDHHS Contract for sentinel events.

- The Provider Network must review critical incidents to determine if it is a sentinel event within three (3) business days of the occurrence/notification of the incident.
- The Provider Network must commence a root cause analysis within two (2) subsequent business days of the identification of a sentinel event.
- Persons involved in the review of sentinel events must have the appropriate credentials to review the scope of care.
- Based on the outcome of the root cause analysis or investigation, the provider must ensure that a plan of action is developed and implemented to prevent further occurrence of the event. The plan must identify who is responsible for implementing the plan, and how implementation will be monitored. Alternatively, the provider may prepare a rationale for not pursuing a preventive plan.
- The Provider Network must report all sentinel events to MSHN through MSHN's Regional Electronic Medical Record Information (REMI) system within the required timeframes as specified by incident.
- A root cause analysis shall be completed for each sentinel event and be available upon request.
- The Provider Network will have a standard for the timeframe of the completion of the root cause analysis.
- MSHN will submit all sentinel events to MDHHS as required.

Applies to:	
All Mid-State Health Network Staff	
Selected MSHN Staff, as follows:	
MSHN's CMHSP Participants: Policy Only	Policy and Procedure
SUD Other: Sub-contract Providers	•

## **Definitions:**

**CMHSP**: Community Mental Health Service Programs

MDHHS: Michigan Department of Health and Human Services

MSHN: Mid-State Health Network PIHP: Prepaid Inpatient Health Plan

<u>Provider Network</u>: Refers to a CMHSP Participant and SUD Treatment and Recovery Providers (ie. all Behavioral Health Providers) that are directly under contract with the MSHN PIHP to provide services and/or supports through direct operations or through the CMHSP's subcontractors.

**REMI:** MSHN's Regional Electronic Medical Information system

Root Cause Analysis: A root cause analysis (JCAHO) or investigation (per CMS approval and MDHHS contractual requirement) is "a process for identifying the basic or causal factors 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, not individual performance." (JCAHO, 1998)

<u>Sentinel Events:</u> Is a Patient Safety Event that reaches a patient and results in any of the following: death, permanent harm, severe temporary harm and intervention required to sustain life. An event can also be considered sentinel even if the outcome was not death, permanent harm, severe temporary harm and intervention required to sustain life. (The Joint Commission 2022). Any injury or death that occurs from the use of any behavior intervention is considered a sentinel event. (Medicaid Managed Specialty Supports and Services Program Contract)

## **Other Related Materials:**

N/A

## References/Legal Authority:

Medicaid Contract

MDHHS Quality Assessment and Performance Improvement Program for Specialty Prepaid Inpatient Health Plans Technical Requirement

MDHHS Critical Incident and Event Notification Requirements

**Change Log:** 

Date of Change	Description of Change	Responsible Party
03.2020	New Policy-Sentinel Event Reporting Requirements	Quality Manager
10.2020	Biennial Review	Quality Manager
10.2022	Biennial Review	Quality Manager
11.2024	Biennial Review-Updated definition of Sentinel Event	Quality Manager