

POLICIES AND PROCEDURE MANUAL

Chapter:	Quality		
Title:	Sentinel Events		
Policy: <input checked="" type="checkbox"/>	Review Cycle: Biennial	Adopted Date: 07.07.2020	Related Policies: Critical Incident Policy Incident Review for Substance Use Providers Policy
Procedure: <input type="checkbox"/>	Author: Quality Improvement Council, Quality Manager	Review Date: 03.07.2023	
Page: 1 of 2			

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

Provider Network: 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.

Sentinel Events: 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. (Medicaid Managed Specialty Supports and Services Program Contract)

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)

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

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