

POLICIES AND PROCEDURE MANUAL

Chapter:	Quality		
Title:	Incident Review for Substance Use Disorder (SUD) Providers		
Policy: <input checked="" type="checkbox"/> Procedure: <input type="checkbox"/> Page: 1 of 3	Review Cycle: Biennial Author: Quality Manager	Adopted Date: 07.07.2020 Review Date: 03.07.2023	Related Policies: Quality-Sentinel Events 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, Substance Use Disorder Incident Review for Sentinel Event Reporting

Policy: MSHN delegates responsibility to its Substance Use Disorder Providers, with oversight and monitoring by MSHN, for collecting and analyzing all incidents that meet the criteria as specified in the MDHHS Sentinel Events Data Report and the SUD Provider Manual. The SUD Provider reviews at a minimum the following incidents for those who reside in a 24-hour specialized setting and recovery housing.

- The provider reports the critical incidents as required to MSHN for analysis and aggregation.
- The provider is responsible for ensuring a process is in place to recommend and implement quality improvement processes in an effort to prevent the reoccurrence of critical incidents.
- MSHN reports to the MDHHS, critical incident data as required and in accordance with the Medicaid Contract
- Oversight and monitoring will be conducted by MSHN through the review of reports, analysis, and provider network monitoring desk audit and site reviews.
- All incidents should be reviewed to determine if the incidents meet the criteria and definitions for a sentinel event and if they are related to practice of care. The outcome of this review is a classification of incidents as either a) sentinel events, or b) non-sentinel events.
- All incidents should be reported to MSHN quarterly (January 15, April 15, July 15, October 15) as indicated in the reporting requirements. Additionally, deaths of recipients and all administrations of Narcan should be reported within 48 hours to MSHN.

Required Critical Incidents

- **Death:** That which is not by natural cause or does **not** occur as a natural outcome to a chronic condition (e.g. terminal illness) or old age.(24 hour residential and Recovery Housing)
- **Emergency Medical Treatment or Hospitalization due to Injury:** Injury by accident resulting in a visit to an emergency room, medi-center and urgent care clinic/center, and/or admissions to hospital. (24 hour residential and Recovery Housing)
- **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. (24 hour residential and

- Recovery Housing)
- Medication errors: Mean a) wrong medication; b) wrong dosage; c) double dosage; or d) missed dosage which resulted in death or loss of limb or function or the risk thereof. It does not include instances in which consumers have refused medication.
- Serious challenging behaviors: Behaviors 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 that result in death or loss of limb or function to the individual or risk thereof. All unauthorized leaves from residential treatment are not sentinel events in every instance) 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." (24 hour residential and Recovery Housing)
- Arrest or conviction: The criminal activity could have occurred prior to the admission to the residential facility, however, the arrest has occurred during the admission. Probation violations and drug court sanctions for not complying with treatment do not need to be reported under this category. (24 hour residential only)
- Administration of Narcan: MSHN required to be reported within 48 hours of occurrence. (24 hour residential and Recovery Housing)

Event Notification

Deaths as a result of staff action or inaction, or subject to a recipient rights investigation, licensing, or police investigation requires additional information to be submitted to the Quality Manager at MSHN for reporting to MDHHS within 48 hours of the notification of an investigation occurring.

The additional information includes the following:

- Name of beneficiary
- Beneficiary ID number (Medicaid ID/MiChild ID)
- Consumer ID (COND) if there is no beneficiary ID number.
- Date, time and place of death (if a licensed foster care facility, include the license#)
- Preliminary cause of death
- Contact person's name and E-mail address.

Applies to:

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

Definitions:

MDHHS: Michigan Department of Health and Human Services

MSHN: Mid-State Health Network

SUD: Substance Use Disorder

Unexpected Deaths: Deaths that resulted from suicide, homicide, an undiagnosed condition, were accidental, or were suspicious for possible abuse or neglect.

Sentinel Event: 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." (JCAHO, 1998)

24-hour Specialized Setting: Means substance abuse residential treatment programs.

Recovery Housing: Recovery housing provides a location where individuals in early recovery from a behavioral health disorder are given the time needed to rebuild their lives, while developing the necessary skills to embark on a life of recovery. This temporary arrangement will provide the individual with a safe and secure environment to begin the process of reintegration into society, and to build the necessary recovery capital to return to a more independent and functional life in the community. These residences provide varying degrees of support and structure. Participation is based on individual need and the ability to follow the requirements of the program. (Excerpt from the proposed Substance Use Disorder Benefit Package for the state of Michigan)

Other Related Materials:

MSHN Sentinel Event Policy
MSHN SUD Provider Manual

References/Legal Authority:

MDHHS/PIHP Contract.
SUD Non-Medicaid Reporting Instructions
MDHHS Sentinel Events Data Report
MDHHS Substance Use Disorder Benefit Package for the State of Michigan

Change Log:

Date of Change	Description of Change	Responsible Party
03.2020	New Policy to address incident review requirement	Quality Manager
10.2020	Biennial Review	Quality Manager
10.2022	Biennial Review	Quality Manager