MSHN
Mid-State Health Network

POLICIES AND PROCEDURE MANUAL

Chapter:	**Quality**		
Title:	**Incident Review for Substance Use Disorder (SUD) Providers**		
Policy: ☒ **Procedure:** ☐ **Page:** 1 of 3	**Review Cycle: Biennial** **Author:** Quality Manager	**Adopted Date: 07.07.2020** **Review Date: 11.10.2026**	**Related Policies:** Quality-Sentinel Events Policy

Purpose: To ensure that the Mid-State Health Network (MSHN) Pre-Paid Inpatient Health Plan (PIHP) is in compliance with the Michigan Department of Health and Human Services (MDHHS), Medicaid Managed Specialty Supports and Services Contract, Substance Use Disorder (SUD) Incident Review for Sentinel Event Reporting.

Policy: MSHN delegates responsibility to its Substance Use Disorder Providers, with oversight and monitoring by MSHN, for collecting, reporting, and analyzing all critical incidents and sentinel events 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 critical incidents for those who reside in a 24-hour specialized residential substance use disorder treatment settings.

A. Provider Responsibilities
1. The provider reports the critical incidents as required to MSHN on a quarterly basis for analysis, reporting, and aggregation.
2. 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 and sentinel events.
3. The provider must determine whether an incident meets criteria for a sentinel event within three (3) business days of occurrence. If classified as a sentinel event, a root cause analysis must be initiated within two (2) additional business days. Events determined to be sentinel events require immediate notification to MSHN via email to sentinelevents@midstatehealthnetwork.org. Additionally, deaths of recipients (regardless of cause) and all administrations of Narcan should be reported within 48 hours to MSHN via email to sentinelevents@midstatehealthnetwork.org.

B. MSHN Responsibilities
1. MSHN reports to MDHHS, critical incident and sentinel event data as required and in accordance with the Medicaid Contract.
2. Oversight and monitoring will be conducted by MSHN through the review of reports, analysis, and provider network monitoring desk audit and site reviews.

C. Required Incident Reporting:

A Critical Incident is any of the following(which must be reviewed to determine whether it meets the criteria of a sentinel event):

- Death of a recipient
- Serious illness requiring admission to a hospital.
- Alleged cause of abuse or neglect
- Accident resulting in injury to recipient requiring emergency room visit or hospital admission
- Arrest and/or conviction
- Serious challenging behaviors
- Medication error

a. Accidents resulting in injuries that result in death or loss of limb or function, and which required visits to emergency rooms, medi-centers and urgent care clinics/centers and/or admissions to hospital should be included in the reporting. In many communities where hospitals do not exist, medi-centers and urgent care clinics/centers are used in place of hospital emergency rooms.
b. 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.
c. Serious Challenging Behaviors are those not already addressed in a treatment plan and include significant (in excess of $100.00) property damage, attempts a 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)
d. Serious physical harm is defined by the State of Michigan Administrative Code for Health and Human Services (330.7001 Rights of Recipients) 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."
e. Medication Errors means 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.

D. Sentinel Event Reporting

A sentinel event is a Patient Safety Event that reaches a patient and results in any of the following:

- Death (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)
- Permanent harm
- Severe temporary harm and intervention required to sustain life

An event can also be considered sentinel event even if the outcome was not death, permanent harm, severe temporary harm and intervention required to sustain life.

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
PIHP: Pre-Paid Inpatient Health Plan
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
12.2024	Biennial Review – Added language consistent with the MDHHS Technical Requirement	Chief Compliance and Quality Officer
04.2026	Biennial Review	Chief Compliance and Quality Officer