

Westmoreland County Behavioral Health and Developmental Services (BH/DS)



Subject: Root Cause Analysis Policy

Issue Date: June 29, 2021

Effective Date: June 29, 2021

This policy will supersede all other previously issued policies, procedures, and regulations regarding behavioral health family support services.

PURPOSE:

The purpose of the Root Cause Analysis Policy is to provide clarification that Westmoreland County Behavioral Health/Developmental Services/Early Intervention (BH/DS/EI) shall require providers to complete a Root Cause Analysis (RCA) on all incidents identified as meeting the definition of a sentinel event. Westmoreland County BH/DS/EI will coordinate the completion of these RCA's by Mental Health, Intellectual Developmentally Disabilities, and Early Intervention service providers. This policy will define requirements and explanation of responsibilities.

BACKGROUND:

Root Cause Analysis is an investigative process that has been used in various settings including military services, NASA, airlines, and the production industry. The process was transposed to health care settings in the mid-1990s by the Joint Commission on Accreditation of Healthcare Organization (JCAHO). The Office of Mental Health and Substance Abuse Services (OMHSA) began utilizing this process in the state hospital system in the mid-1990s.

The basic concept of an RCA is to conduct a detailed investigation of the circumstances of an event to discover the specific cause(s) of the event and to identify underlying system(s) issues that may have led to the event. If at any time during the investigation, critical issues that require immediate intervention are discovered, such issues must be addressed as quickly as possible. Ultimately, the goal of the RCA is to identify issues/processes that have potential for redesign to reduce risk and promote safety, and to arrive at recommendations on how to best prevent the recurrence of similar sentinel events.

A Root Cause analysis is intended to have a positive impact on the provision of care and service, promote system collaboration, assist in the prevention of similar incidents in the future, establish benchmarks for improvement opportunities and help to assert and maintain public trust in services provided.

Westmoreland County BH/DS/EI is required by the Pennsylvania Office of Mental Health and Substance Abuse Services (OMHSAS) to ensure that an RCA is completed on all incidents identified as meeting the definition of sentinel event. Westmoreland County BH/DS/EI will coordinate the completion of RCAs by mental health, intellectual developmentally disabilities and early intervention service providers.

A sentinel event is defined as an unexpected occurrence involving death or serious physical or psychological injury, or risk thereof, unrelated to the natural course of an individual's illness or underlying condition. For this process, the sentinel event will involve one or more persons who receive or have received services from a contracted provider agency or service of the

Westmoreland County BH/DS/EI or an event that impacts in a significant manner on the entire Behavioral Health/Developmental Services/Early Intervention system.

Examples of sentinel events involving person(s), but not limited to include:

- An unexpected or unexplained death or serious injury to a consumer that results in a major permanent loss of function that is not related to the natural course of the patient's illness or underlying condition.
- Apparent suicide/serious suicide attempt of a consumer receiving care, treatment, or services in a staffed care setting or within 72 hours of discharge from care, treatment, or services.
- Elopements and/or missing person situations
- Allegation/confirmation of consumer being the victim or alleged perpetrator of a serious crime (e.g., felony such as arson, attempted homicide, homicide, or rape).

Unexplained and/or significant increases in adverse events associated with on-particular provider or the system would also warrant consideration of the RCA process. Other critical incidents may be determined to be sentinel events depending on the circumstances and /or events related to the incident.

PROCESS:

The Root Cause Analysis is an Internal Peer Review Process which is highly confidential and thereby covered by Pennsylvania's Peer Review Protection Act, 63 P.S. Section 425.1 et, seq.. The process is designed to identify Quality Improvement recommendations for the Westmoreland County Behavioral Health, Developmental Services, Early Intervention System.

Critical Incident Reports submitted by providers/service agencies will be reviewed by Westmoreland County BH/DS/EI. Critical incidents that rise to the level of a sentinel event that require an RCA will be identified and an RCA process will be initiated. Providers may also request to initiate the RCA process.

Provider(s) (including Outpatient, Case Management, Assertive Community Treatment Team or Residential Program) will be required to complete an RCA investigation of the identified sentinel event. RCAs may be requested from multiple organizations for individuals receiving services from multiple providers. For high profile and/or profoundly serious incidents, Westmoreland County BH/DS may initiate the RCA process immediately upon learning of the incident.

To assist in maintaining confidentiality of specific consumer and provider information, a unique identification code to each sentinel event being reviewed in the RCA process and this code will be used in all RCA communications related to that sentinel event.

A Framework for a Root Cause Analysis and Action Plan will be completed by the provider(s), including action plans, and identified system issues. The Plan will be reviewed by Westmoreland County BH/DS/EI and an RCA meeting will be scheduled.

Westmoreland County BH/DS/EI will facilitate the RCA meeting. An action plan will be developed to address areas for improvement and/or system issues. Providers are responsible for implementing and monitoring the implementation of their action plans that result from an RCA. Westmoreland County BH/DS/EI will be responsible for reviewing the system issues and recommendations and will develop a plan for system improvements.

Upon completion of the provider RCA process, any written RCA reports, except the report on the system issues, held by Westmoreland County BH/DS/EI will be destroyed, or upon request, returned to the provider.