

**NH Department of Health and Human Services
Bureau of Quality Assurance and Improvement (BQAI)
POLICY AND PROCEDURE MANUAL**

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Document Name: Sentinel Event Reporting and Review	
Original Effective Date: April 24, 2019	Revision Date: January 27, 2020

Purpose:

The Department of Health and Human Services' (DHHS) Sentinel Event Reporting and Review Policy is part of a comprehensive quality assurance program with the Bureau of Quality Assurance and Improvement (BQAI). The Sentinel Event Policy establishes the reporting and review requirements of sentinel events involving individuals served by the Department. Both community providers and DHHS Divisions or Bureaus that provide direct care services shall report sentinel events as directed by this policy.

The goals of this policy are to:

1. Have a positive impact in improving care and service delivery.
2. Understand the causes that underlie sentinel events.
3. Make changes to internal and external systems and processes as indicated.
4. Reduce the probability of such events occurring in the future.

Background:

In support of its commitment to quality in the delivery of health and human services to the citizens of New Hampshire, the Department will review sentinel events as part of its quality assurance and improvement activities. Statutory authority for reviews of sentinel events is set forth in NH RSA 126-A:4, IV:

RSA 126-A:4 Department Established.

IV. The department may establish a quality assurance program.

- a) Any quality assurance program may consist of a comprehensive ongoing system of mechanisms for monitoring and evaluating the appropriateness of services provided to individuals served by the department or any of its contract service providers so that problems or trends in the delivery of services are identified and steps to correct problems can be taken.*
- b) Records of the department's quality assurance program including records of interviews, internal reviews or investigations, reports, statements, minutes, and other documentation except for individual client medical records, shall be confidential and privileged and shall be protected from direct or indirect discovery, subpoena, or admission into evidence in any judicial or administrative proceeding, except as provided in subparagraphs IV (c) or (d).*
- c) In case of legal action brought by the department against a contract service provider or in a proceeding alleging repetitive malicious action and personal injury brought against a contract service provider, the quality assurance program's records may be discoverable.*
- d) The department may refer any evidence of fraudulent or other criminal behavior gathered by the quality assurance program to the appropriate law enforcement authority.*
- e) No employees of the department or employees of a contract service provider or vendor shall be held liable in any action for damages or other relief arising from the providing of information to a quality assurance program or in any judicial or administrative procedure relating to the DHHS' quality assurance program.*

**NH Department of Health and Human Services
Bureau of Quality Assurance and Improvement (BQAI)
POLICY AND PROCEDURE MANUAL**

Definition:

A sentinel event is an unexpected occurrence involving death or serious physical or psychological injury, or risk thereof. Serious injury specifically includes loss of limb or function. The Bureau of Quality Assurance and Improvement (BQAI) has adopted the following categories of reportable sentinel events.

Client-centered sentinel events, in which the individual is either a victim and/or perpetrator, include:

1. Any sudden, unanticipated, or accidental death, not including homicide or suicide, and not related to the natural course of an individual's illness or underlying condition.
2. Permanent loss of function, not related to the natural course of an individual's illness or underlying condition, resulting from such causes including but not limited to:
 - a medication error, and/or
 - an unauthorized departure or abduction from a facility providing care, and/or
 - A delay or failure to provide requested and/or medically necessary services due to waitlists, availability, insurance coverage, or resource limits.
3. Homicide.
4. Suicide.
5. Suicide attempt, such as self-injurious behavior with a non-fatal outcome, with explicit or implicit evidence that the person intended to die and medical intervention was needed.
6. Rape or any other sexual assault.¹
7. Serious physical injury to or by a client.²
8. Serious psychological injury that jeopardizes the person's health that is associated with the planning and delivery of care.
9. Injuries due to physical or mechanical restraints.
10. High profile event, such as:
 - media coverage;
 - police involvement when the involvement is related to a crime or suspected crime; and/or,
 - an issue that may present significant risk to DHHS staff or operations.

Policy and Procedure:

I. Applicability

A. *Reportable sentinel events shall be those events that involve individuals who:*

- Are receiving or have had contact with individuals who provide Department funded services as described in I.B and I.C.
- Have received Department funded services as described in I.B and I.C within the preceding 30 days.

¹ Sentinel events do not include sexual abuse allegations reported to APS Intake or DCYF Central Intake, but do include reports referred to DCYF Special Investigations, reports occurring in NHH, SYSC, and those listed in I.B. and I. C.

² Sentinel events do not include reports to DCYF Central Intake if it is an accident (i.e.: car accident, sports injury) and already reported to DCYF as an accidental incident.

**NH Department of Health and Human Services
Bureau of Quality Assurance and Improvement (BQAI)**

POLICY AND PROCEDURE MANUAL

- Have received Community Mental Health Center Emergency Services and/or any known psychiatric hospitalization within the past year.
- Have an open case with Child or Adult Protective Services.

B. The following DHHS funded community providers shall be required to report sentinel events:

- Community Mental Health Centers
- Area Agencies
- Case Management Agencies (Choices for Independence Home and Community Based Care Medicaid waiver program)
- Transitional Housing
- Harbor Homes
- Substance Use Disorder service providers

C. The following DHHS Divisions and Bureaus which provide direct care services shall be required to report sentinel events:

24-hour Healthcare Facilities

- New Hampshire Hospital
- Glenclyff Home
- Laconia BDS DRF

Division for Behavioral Health

- Bureau of Mental Health Services
- Bureau of Children's Behavioral Health
- Bureau of Drug and Alcohol Services

Division of Economic and Housing Stability

- Bureau of Family Assistance
- Bureau of Employment Supports
- Bureau of Child Development and Head Start Collaboration
- Bureau of Housing Supports

Division of Long Term Supports and Services

- Bureau of Elderly and Adult Services
- Adult Protective Services
- Bureau of Developmental Services

Division for Children, Youth and Families

- Child Protective Services
- Juvenile Justice Services
- Sununu Youth Services Center

**NH Department of Health and Human Services
Bureau of Quality Assurance and Improvement (BQAI)
POLICY AND PROCEDURE MANUAL**

D. Medicaid Managed Care Organizations (MCOs)

- MCOs shall report Sentinel Events involving members receiving services as described in I.B and I.C.

II. Notification

A. Immediate Verbal Notification

Within 24 hours upon the discovery of a sentinel event by a community provider or by a DHHS Division or Bureau (whether by direct report by a provider, other mandatory reporting mechanisms, or a more general discovery) as identified in the Applicability Section I above, that person or entity shall provide verbal notification to the appropriate DHHS Bureau Administrator or designee.

Verbal notification shall be provided by direct telephone contact. If direct telephone contact is not possible, a confidential voice-mail shall be left.

The following information shall be provided:

1. The reporting individual's name, phone number, and agency/organization.
2. Name and date of birth (DOB) of the individual(s) involved in the event.
3. Location, date, and time of the event; description of the event, including what, when, where, how the event happened, and other relevant information, as well as the identification of any other individuals involved.
4. Whether the police were involved due to a crime or suspected crime.
5. The identification of any media that had reported the event.

B. DHHS Internal Process

Upon receiving notification of a sentinel event, the Division Director or Bureau Administrator, or any other Department representative who receives the notification, shall report the event to the Department's BQAI Director, or designee, and the appropriate Department's Associate or Deputy Commissioners either by direct telephone contact, voice-mail or e-mail.

C. Sentinel Event Reporting Form and eStudio Notification

Written notification of the sentinel event shall be provided by the reporting person or designated agency staff to the appropriate DHHS Office and/or Division/Bureau Directors within 72 hours of the event. Written notification must be done by completing a Sentinel Event Report Form as indicated by the Sentinel Event Reporting Form Work Instructions document. The completed form is to be uploaded to the eStudio application, available at <https://nh.same-page.com>³.

The community agency or DHHS Division or Bureau that completed the Sentinel Event Reporting Form also has the responsibility to upload the completed form to the eStudio application in the folder developed for its agency, Division or Bureau. The individual uploading the completed form must select the appropriate names and pre-determined "e-team" in the eStudio application per instructions. The

³ Users shall be trained on and approved for DHHS eStudio use, per the "eStudio Training Protocol"

**NH Department of Health and Human Services
Bureau of Quality Assurance and Improvement (BQAI)**

POLICY AND PROCEDURE MANUAL

eStudio application sends a corresponding e-mail notification of the uploaded Sentinel Event Reporting Form to the selected individuals and the members of a selected “e-team.”

The applicable Division/Bureau Director or designee shall review the eStudio Sentinel Event Reporting Form submission for completeness, accuracy, and whether the reported event meets the criteria of a sentinel event as defined in this policy.

Any question regarding whether a submitted Sentinel Event Reporting Form meets the criteria for a sentinel event should be addressed to the Division/Bureau’s representative on the DHHS Sentinel Event Reporting and Review Committee or with the Bureau of Quality Assurance and Improvement.

Additional information regarding the sentinel event shall be reported as it becomes available, and upon the Department’s request, be uploaded to the eStudio application. Such information may include additional details as they are learned, a change in the status of the situation, or links to relevant newspaper articles.

D. Confidentiality

Both community providers and Department Divisions/Bureaus that report sentinel events shall comply with applicable confidentiality laws and Health Insurance Portability and Accountability ACT (HIPAA) Covered Entity requirements, regarding the reporting and transmission of confidential information and protected health information.

III. Mandatory Reporting

Reporting sentinel events under the provisions of this policy shall not replace the mandatory reporting requirements of RSA 161-F:42-57 and RSA 169-C:29 with regard to abuse, neglect, self-neglect, or exploitation.

IV. Sentinel Event Review

The following DHHS Sentinel Event Review process does not preclude or replace the reporting Division/Bureau from conducting its own incident review, per its applicable DHHS administrative rules and/or policies.

A. Authority

The Commissioner, Deputy Commissioner, Associate Commissioner, or their designees, shall assign responsibility to the DHHS BQAI Director or designee to conduct reviews of selected sentinel events.

Sentinel events to be reviewed include but are not limited to those:

1. Requested by the Office of the Commissioner, any Division Director, or BQAI Director.
2. That, given the available information, the BQAI Sentinel Event Reporting and Review Committee identifies sentinel events in which more than one agency/system was involved with an individual’s care and in which there is preliminary evidence of potentially one or more systemic factors.

**NH Department of Health and Human Services
Bureau of Quality Assurance and Improvement (BQAI)
POLICY AND PROCEDURE MANUAL**

B. Notice

As applicable, the DHHS BQAI Director, Administrator or designee shall inform the appropriate DHHS Division/Bureau Director and the BQAI Administrator of the Sentinel Event Reporting and Review Committee, via e-mail, that a Sentinel Event Review is to be scheduled.

For sentinel event reviews involving one or more DHHS Divisions or Bureaus, the BQAI Sentinel Event Reporting and Review Committee is responsible for the following:

1. Information about the sentinel event, including who the event involves and the reason for the sentinel event review.
2. Identification of Department participants, including those staff directly involved with the client and/or event, who are required to attend the review.
3. Identification of the client-involved community agencies or providers who should be invited to attend.
4. Invitation to the Sentinel Event Review, indicating the date, time, and location of the review.
5. Instructions on how to prepare for the review, including:
 - Identification and invitation to other Department and provider-level participants.
 - Identification of who among the invitees shall be the presenter(s).
 - Gathering information, as applicable from sources such as community agency site visits, presenters, as applicable, and clinical record reviews.
 - Providing relevant documentation, such as Division, facility, and service provider reports, notes, correspondence, policies, and Individual Service Plans and/or Support Plans.
 - Providing information shall be the responsibility of the individual or entity that has the relevant documentation.
 - Documentation shall be brought to the review for reference, but shall not be copied, distributed, or otherwise maintained by the BQAI Sentinel Event Reporting and Review Committee.

C. Sentinel Event Review

1. The Sentinel Event Review shall include a case presentation(s) that provides review of the event and relevant documentation, including:
 - demographic information;
 - agency prior involvement with the individual;
 - description of the event;
 - clinical description of the individual involved;
 - information on the known system/agency involvement outside of DHHS;
 - immediate action taken by the agency when the event occurred;
 - other administrative/operational issues relevant to the event; and,
 - description of all identified opportunities for improvement.
2. The review of the event shall identify systemic factors, opportunities for improvement and recommendations for follow-up activities, if any.
3. No minutes of the review proceedings shall be taken, maintained or distributed.

**NH Department of Health and Human Services
Bureau of Quality Assurance and Improvement (BQAI)**

POLICY AND PROCEDURE MANUAL

4. Records of the identification of systemic factors, and opportunities for improvement and recommendations for follow-up activities will be drafted by the BQAI Sentinel Event Reporting and Review Committee and will be held as DHHS Sentinel Event Review Committee confidential information under quality assurance activities.
5. Records of the identification of systemic factors, opportunities for improvement and recommendations for follow-up activities will be distributed to the sentinel event review participants and to the members of the BQAI Sentinel Event Reporting and Review Committee, when applicable.
6. The BQAI Sentinel Event Reporting and Review Committee will monitor the status of the opportunities for improvement and recommendations for follow-up activities as part of its monthly meetings. Notification of incomplete or unsatisfactory follow-up activities or need for additional information will be made to the appropriate DHHS Division for remediation.

D. Confidentiality

Pursuant to RSA 126-A:4, IV, any and all records of or prepared solely for the DHHS Sentinel Event Review shall be confidential and privileged communications.

V. Related Documents

Document Type	Description	Reference Number	Folder Location
Work Instructions	Instructions for completing the sentinel event reporting form	WI.1003	https://www.dhhs.nh.gov/bqai/hsa.htm
Form	Sentinel event reporting form	F.1003	https://www.dhhs.nh.gov/bqai/hsa.htm