112.0 Sentinel Events and Media Contacts

112.1 Policy Approval Clearance Record

☒ Rural Services Policy ☐ Mental Health Policy ☐ Developmental Services Policy	This policy supersedes: N/A	Number of pages in Policy: 3
Review by Representative from the Office of the Attorney General: N/A	Date: N/A	Date Policy Effective: 10/31/2011
Rural Services Director Approval Signature: *Barbara Legier*	Date: 1/19/12	Policy Lead: Eric Skansgaard, CPM II

112.2 Statement of Purpose

112.2.1 **Policy Statement:** All sentinel events and media contacts are important occurrences requiring provision of a briefing to Administration and potentially the Director of Health and Human Services. With regards to media contacts, this includes both contacts initiated by a division agency and by the media.

112.2.2 **Purpose:** To establish procedures which ensure: a) information is properly disseminated to the public; b) information is of high quality, consistency, and accuracy; and c) that HIPAA rights of all clients, living and deceased, are adequately protected.

112.3 Authority

45 CFR 164.104 and 164.508
NRS 433.482 and 433.534

112.4 Unique Definitions and Acronyms

112.4.1 **Sentinel Event**: An unexpected occurrence involving the death or serious physical or psychological injury of a person receiving services, or the risk thereof. Serious injury specifically includes loss of limb or function. The phrase, “the risk thereof” includes any event for which a recurrence would carry a significant chance of a serious adverse outcome.

An event is reportable as a Sentinel Event if any of the following occur:

A. Death within 48 hours of discharge from outpatient services.

B. Death for persons receiving Developmental Services.

C. Loss of limb or permanent loss of function.

D. Sexual assault, as victim or perpetrator.

E. Paralysis, coma or other major permanent loss of function associated with provision of any agency service.

F. Adverse outcomes that are directly related to the natural course of an illness or underlying condition are exempt from the reporting requirement.

112.5 Procedures

112.5.1 Sentinel Events

A. When agency staff becomes aware of a Sentinel Event as defined in this policy, he/she must notify a supervisor within one (1) hour of notification of the event.

B. When agency staff becomes aware of an incident that could have resulted in any of the outcomes described in Section 112.4.1 (A-F), he/she must notify a supervisor within one (1) hour of notification of the event.

C. The supervisor must notify the Agency Director or designee within one (1) hour of notification of the event.

D. The Agency Director or designee will notify the Administrator/designee of the Division of Mental Health and Developmental Services (MHDS) within one (1) hour of notification of the event.

E. Agency staff must complete a Serious Incident Report immediately. The report must include the immediate care rendered to the individual; contributing factors involved; and the nature of any injury.

F. The Agency Director will evaluate the event and conduct the appropriate level of inquiry as specified in the agency investigations policy.

G. The Agency Director, in consultation with the Agency Safety Officer, will evaluate the applicability of MHDS Policy 4.054 (X) and ensure reporting as prescribed in applicable situations.

112.5.2 Media Contacts

A. **Media Contact, Prior Approval**: Agency staff will report to the Agency Director or designee any actual or potential media initiated contacts before providing a response. Staff shall complete the “Media Contact Report” (online form) and forward through channels to the Agency Director. The Agency Director will consult with the Division Administrator or designee and shall receive prior approval by the Division Administrator before providing a response.

B. **Unplanned Media Contact**: Notice of any unplanned media contact shall be made by completing a “Media Contact Report” (online form). This form shall be forwarded to the MHDS Central Office the same day of the media contact. If the media contact occurs after hours or on a weekend or holiday, involved staff and supervisors will ensure reporting through channels results in notification of the Agency Director. The Agency Director will notify the Division Administrator or designee on home or cell phone.

C. Responses on the media contact form shall seek to answer the following questions:

1. Who (agency staff and media personnel involved)?
2. What information was requested and provided?
3. How and when do you expect the media to use this information, if known?
4. Any additional comments that may be useful to MHDS Central Office and DHHS in responding to questions that may be received about the media contact.

112.5.3 Privacy of Records in a Sentinel or Media Event

A. Authorized access or use of information in the clinical record during a Sentinel or Media Event is limited to provision of ongoing treatment by the treatment team and administrative oversight by management personnel. This includes information in the clinical record of a deceased or incapacitated client. Any further use or disclosure requires written consent of the individual or guardian.

B. During a Sentinel or Media Contact Event, authorized access or use of information in the electronic record is limited to provision of ongoing treatment by the treatment team and administrative oversight by management personnel. This includes information in the electronic client record of a deceased or incapacitated client. Any further use or disclosure requires written consent of the individual or guardian.

C. Curiosity about any client or staff involved, or potentially involved, in a Sentinel or Media Contact Event does not authorize agency staff to access information in any client record, physical or electronic.

D. Information regarding a deceased person obtained from the client record or during the course of treatment remains confidential following the client's death. Only a court order granting the decedent's information to the guardian of the decedent's estate constitutes authorization to release information and staff will consult with Agency Director or CPM II prior to disclosure or release of information on any deceased client.

112.5.4 Timelines

Table 112.1: Timelines for Sentinel Events or Media Contacts

Requirement	Deadline	Starting Date	Responsible Party	Actions to be Taken
112.5.1.A, B	One (1) hour	Awareness or notification of event	Agency Staff and Contract Providers	Notify Supervisor within one (1) hour of awareness or notification.
112.5.1.D	One (1) hour	Awareness or notification of event	Agency Director or Designee	Notify MHDS Administrator or Designee, State Medical Director, State Performance Improvement Director of the event.
112.5.1.E	Immediately	Event	Agency Staff	Complete Serious Incident Report

112.5.5 Documentation

A. Case File Documentation (paper):

Table 112.2: Case File Documentation for Sentinel Events and Media Contacts

File Location	Data Required
Miscellaneous/Legal	Current Release of Information authorizing specific person or entity to whom information is to be released

112.5.6 Supervisory Responsibilities: Supervisors will provide in-service training to ensure all staff understands the requirements of this policy and its procedures. Supervisors will revisit this policy periodically, but no less than annually to identify recommendations for improvement.

112.6 Policy Cross Reference

112.6.1 MHDS Policy 6.011 and 6.012