

CRITICAL INCIDENTS ARE

Any circumstance or event that is different from the usual course of business or daily functioning at your location or involving our work.

Report incidents involving a **client, staff or visitor** at your site or in the community as part of our work.

Reportable events are incidents:

- considered high risk or harm to a client, staff or visitor,
- · adversely affecting health or safety,
- that might impede the quality of client services,
- are likely to affect the relationship between BHRS and the community, or
- risk the security of data or the confidentiality/privacy of Protected Health Information.

^{*}MH Residential programs also follow CCL requirements which requires a higher level of reporting.

What happens with Critical Incident Reports after they are completed?

Quality Management and the BHRS Director Team reviews 100% of critical incident reports.



This review process assists us in ensuring safety is maintained, helps us to develop/modify policies/procedures, and develop trainings.



This information is used to evaluate and track the:

Health and safety of clients and staff

Quality of services

Impact of services on the community

Protection of health information

How does Completing Critical Incident Reports Improve Client Safety & Care?

By reviewing near misses or errors, BHRS learns and acts to prevent repeated near misses and hopes to reduce sentinel events.*

- Critical Incidents are reviewed to learn what we could do different to reduce risk next time.
- This learning is designed to prevent any errors and to improve our ability to predict risk.

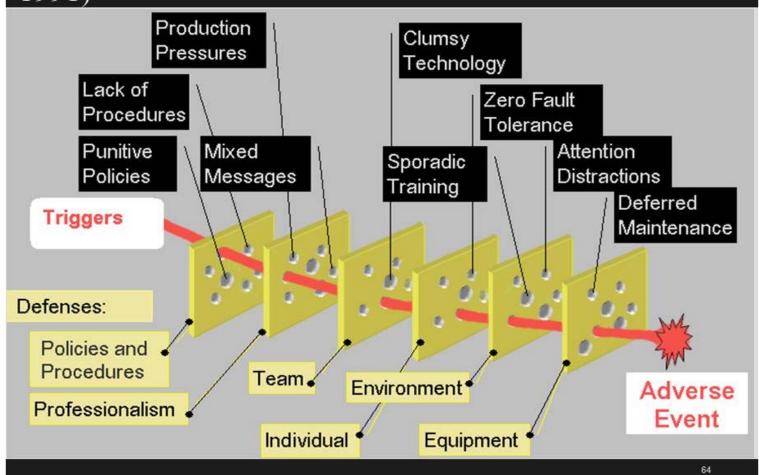
Avoidable medical management errors occur when we fail to:

- review "near misses" and evaluate potential risks,
- implement and monitor plans to avoid potential risks,
- and the same situation occurs again causing an adverse outcome for our client, staff, or community member.

^{*} an unexpected occurrence involving death or serious physical or psychological injury, or the risk thereof



Multi-Causal Theory "Swiss Cheese" diagram (Reason, 1991)



https://www.nytimes.com/2020/12/05/health/coronavirus-swiss-cheese-infection-mackay.html

Multiple Layers Improve Success

The Swiss Cheese Respiratory Pandemic Defense recognizes that no single intervention is perfect at preventing the spread of the coronavirus. Each intervention (layer) has holes.

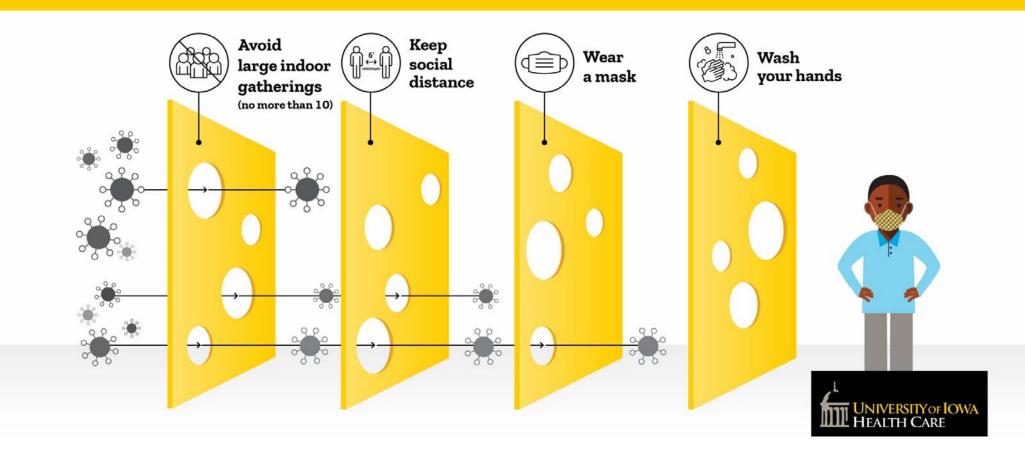
Personal responsibilities **Shared** responsibilities Physical distance, Hand hygiene, If crowded. Ventilation, outdoors, Quarantine stay home if sick air filtration and isolation cough etiquette limit your time Avoid touching Fast and sensitive Government messaging Masks **Vaccines** your face testing and tracing and financial support

ource: Adapted from Ian M. Mackay (virologydownunder.com) and James T. Reason. Illustration by Rose Wong

HOW TO STOP COVID-19: THE SWISS CHEESE MODEL

The more steps you take, the safer you are against COVID-19.

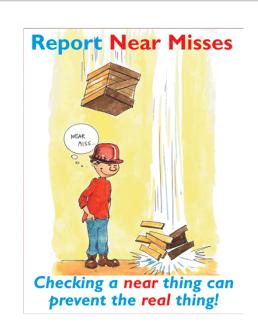
→ uihc.org/covid-toolkit

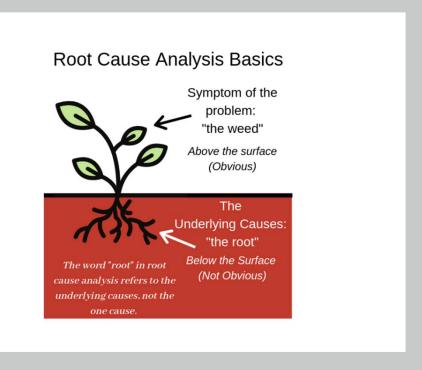


Reviewing Critical Incidents to find the Root Cause

By monitoring and reviewing when things almost go wrong, what we call "near misses," we can prevent a more serious negative outcome and/or prevent a sentinel event.

We look for the root cause of the error/problem to address the problem at the root.





Preventing Sentinel Events

A sentinel event is an unexpected occurrence involving death or serious physical or psychological injury, or the risk thereof.

Examples of sentinel events in our work:

- Suicide
- Overdose or medication mistake resulting in death or significant health impact
- Delay in care resulting in significant deterioration of health/well-being
- Assault or harm to a client occurring in a residential facility
- Fall in a residential facility

Steps for Incident Reporting

San Mateo BHRS Reporting Requirements







Who is Required to Report Critical Incidents to BHRS Quality Management?

- All BHRS staff including clinical and nonclinical staff, students, volunteers, and contractors working with BHRS.
- Any agency contracting with BHRS and their staff.
- Private providers in the network providing care to BHRS clients.



Assessing Risk for Critical Incidents

- If you observed or are made aware of a critical incident, any IMMEDIATE RISK must be addressed FIRST.
- Assess the immediate situation and take the necessary measures to ensure client, staff and community safety.
- Every clinic, contract agency and location is required to have an Emergency Response Plan and to train staff on that plan.
- Take action or ask for help.





Email or Fax Critical Incident to: HS_BHRS_QM@smcgov.org Fax: (650) 525-1762

Becoming Aware of an Incident: What should you do?

- Any BHRS staff, intern, trainee, provider, or contractor observing an incident or becoming aware of an incident is required to inform his/her supervisor about it.
- You and your supervisor will decide whether it is a critical incident.
 Supervisors will report serious incidents to their manager.
- Decide who will take the lead to report and manage the incident.
 Occasionally 2 programs will submit a report on the same incident. That's okay.
- If you are the person who observed the incident or received the report, you are **obligated** to initiate the Critical Incident Report (or CCL report for MH residential, or contract form as appropriate).
- Complete the Critical Incident Report and email or fax the report to BHRS
 Quality Management within 24 hours.
- If you have any questions about Critical Incident Reporting or are unsure if an incident requires an Incident Report, consult your supervisor and/or contact Quality Management.

Critical Incident Report

Email or Fax Critical Incident to: HS_BHRS_QM@smcgov.org

Fax: (650) 525-1762

Critical incidents should be submitted within 24 hours of when the incident occurs or you become aware of the incident.

Once you have completed the Critical Incident Report, email it to the address on the top of the form. If you don't have access to the fillable version, print it out, complete it and fax it to the number on the top of the form.

BHRS staff are required to use this Critical Incident Reporting form (except COYC). The form is located at https://www.smchealth.org/bhrs-doc/critical-incident-reporting-93-11

Contractors and Private Providers may use this form or their own internal form.



San Mateo County Behavioral Health & Recovery Services

(DO NOT PLACE IN CHART

CRITICAL INCIDENT REPORT

Confidential Risk Management/Quality Assurance Document - Protected by Evidence Code 1157 Et. Seq.

IRS programs - Email report with Unit Chief/Med Chief/Supervisor Comments to QM:

Contracted programs Fax to 650-525-1762 County Staff -email to HS BHRS QM@smcgov.

Must SEND TO BHRS QM WITHIN 24 HOUR

The person most closely involved or the person discovering the incident should complete this form on both sides as soon as practical efter an incident has occurred

	Reporting Program: Access a ADS a ARM a BAART-AOD a BHRS AOD a Caminar a Central a Child Welfare a Coastride a Cordilleras a EPA a Edgewood a Fred Finch a Interface a Mateo Lodge/Wally's a MHA a North a Oasis a OCG a Palm Ave a Pathways a PES a Program Office a Puente a PV-SBMH a Service Connect a			
Phone: Shasta a South a StarVista a TDS a Telecare a Total Wellness a VRS a YSC a YT Other a:				
Who was involved? (Check all that apply)				
☐ Client Name	MH# age			
· · · · · · · · · · · · · · · · · · ·	other Conserved Dyes Dno Dependent adult Dyes Dno			
	MH# age			
(Circle one) □Male □Female □O □ Staff Member(s)	other Conserved			
Date occurred?/	TimeAM or PM Incident Resulted in Arrest: At clinic Offsite			
Where occurred? ☐ clinic/Agency ☐ H	Home/Apartment School Shelter Community Other			
☐ Supported Residence: Name	☐ Residential Facility: Name			
Was Incident: Observed □ Reporte	d/Alleged □ Substance Use Involved: □ No □ Yes □ Suspected □ Unknown			
BEHAVIOR RELATED	□ Symptom Related Issue □ High Risk Behavior (Drugs, sex, etc.) □ Rule Compliance			
DAWOL/ Wandering- Returned: Dies DNo	□ symptom kelated issue □ nigh kisk behavior (brugs, sex, etc.) □ kule compilance			
HOSPITAL/PES/POLICE RELATED				
□ 5150 Problem/IP Care Related/Ambulance	e (<u>not routine</u>): Name of Hospital/Ambulance			
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Critical Incident Form

All residential programs use the Community Care Licensing form *UNUSUAL INCIDENT/INJURY REPORT* and are not required to complete the BHRS form

https://cdss.ca.gov/cdssweb/entres/forms/English/LIC624.PDF

Email or Fax Critical Incident to: HS_BHRS_QM@smcgov.org

Fax: (650) 525-1762

JNUSUAL INCIDENT/INJUREPORT	RESPONSIBLE SUBMIT WRIT			NSING AGENCY, PLACEMENT AGENCY AND E PERSONS, IF ANY, BY NEXT WORKING DAY. TTEN REPORT WITHIN 7 DAYS OF OCCURRENCE. Y OF REPORT IN CLIENT'S FILE. TELEPHONE NUMBER ()		
		OCCURRED	AGE SEX		DATE OF	ADMISSION
TYPE OF INCIDENT Unauthorized Absence Aggressive Act/Self Aggressive Act/Another Client Aggressive Act/Another Client Physical Psychological Aggressive Act/Family, Visitors Alleged Violation of Rights Neglect RECRIBE EVENT OR INCIDENT (INCLUDE DATE, TIME, LOCATION, PERPETRATOR, NA INV INJURES:		Rape Pregnancy Suicide Attempt Other		Injury-Accident Injury-Unknown Origin Injury-From another Client Injury-From behavior episode Epidemic Outbreak Hospitalization		Medical Emergency Other Sexual Incider Theft Fire Property Damage Other (explain)
ERSON(S) WHO OBSERVED THE INCIDENTENJURY:						

Some teams have special reports that are required in addition to the BHRS Critical Incident Report STATE OF CALIFORNIA - HEALTH AND HUMAN SERVICES AGENCY

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES COMMUNITY CARE LICENSING DIVISION

LAW ENFORCEMENT CONTACT REPORT

THIS FORM MAY BE USED TO REPORT INCIDENTS AS REQUIRED BY HEALTH AND SAFETY CODE SECTION 1538.7. A SEPARATE UNUSUAL INCIDENT REPORT DOES NOT NEED TO BE SUBMITTED IF ALL REQUIRED INFORMATION IS PROVIDED.

INSTRUCTIONS: NOTIFY LICENSING AGENCY, PLACEMENT AGENCY AND AUTHORIZED REPRESENTATIVE, IF ANY, BY NEXT BUSINESS DAY.

SUBMIT PART 1 OF THIS REPORT WITHIN 7 DAYS OF OCCURRENCE.

SUBMIT PART 2 OF THIS REPORT WITHIN 6 MONTHS OF OCCURRENCE. PART 2 MAY BE SUBMITTED SOONER THAN 6 MONTHS INCLUDING CONCURRENTLY WITH THE INITIAL REPORT, IF ALL OUTCOMES RESULTING FROM THE INCIDENT ARE KNOWN.

Licensed Capacity: 12 Current Census: IAME OF FACILITY (as appears on license) Canyon Oaks Youth Center ADDRESS			FACILITY LICE			
IAME OF FACILITY (as appears on license) Canyon Oaks Youth Center ADDRESS			FACILITY LICE			
Canyon Oaks Youth Center			FACILITY LICE			
ADDRESS			TAOLETT LIOL	NSE NUMBER		
			415600309			
100 5 1 5 1			TELEPHONE N	IUMBER		
400 Edmonds Road			(650) 839-18	310		
COUNTY, CITY, STATE, ZIP			DATE OF INCID	DENT		
Redwood City, CA 94062						
TYPE OF INCIDENT (check all that apply)						
Aggressive Act:	Other:			Alleged Client Abuse:		
Client to Client Staff to Client	Behavior Episode	Psycholo	gical	Sexual		
Client to Other Unknown	Substance Abuse	Property	Damage	Physical		
Client to Staff Other to Client	Unauthorized	Non-phys	sical Aggression	Psychological		
_	Absence (AWOL)	Theft	10000	Financial		
	Harm To Self		Neglect			
CHILD INVOLVED	TYPE OF PLACE	MENT AGE	GENDER	DATE OF ADMISSION		
	Choose One	-	Choose One	•		
	Choose One	-	Choose One	•		
	Choose One	•	Choose One	•		
	Choose One	-	Choose One	•		
AGENCIES / INDIVIDUALS NOTIFIED	•	PHONE				
LICENSING						
AW ENFORCEMENT						
PLACEMENT AGENCY						
AUTHORIZED REPRESENTATIVE						
F A POLICE REPORT WAS FILED, PRO	OVIDE NUMBER IF KN	OWN (Option	nal) 20-07299			
WERE DE-ESCALATION TECHNIQUES	USED PRIOR TO CO	NTACTING	LAW ENFORCEM	IENT? YES NO		



Critical Incidents & Progress Notes: What to Include and Not Include

- A staff member should document descriptions of incidents in a progress note, but should NOT state that an incident report was made and never include a copy of the report in the chart.
- Section 1157 of the California Evidence Code creates an exemption from discovery for proceedings and records of certain organized medical committees responsible for evaluating and improving the quality of care. Section 1157 also prohibits compelled testimony regarding the content of any such meeting.
- You may include in your progress note details such as what happened, any concerning behaviors, how you evaluated the risk, your interventions, client responses, and if follow-up is needed.
- Use quotes in the progress note when possible.
- Protect the confidentiality of intended victims, if client named any.



Categories of Reportable Incidents

Common Reportable Incident

- Abuse
- Arrest
- Assault By Client
- Assault To Client
- Assault To Staff
- AWOL
- Car Accident
- Confidentiality Breach
- Death
- Facility Safety/Maintenance
- Fall or Injury
- General Staff Concern

- High Risk Behavior (drug use, sexual)
- Medical Problem
- Medication Count (+/pills)
- Medication Error
- Pharmacy Error
- Self-Harm
- Suicide
- Suicide Attempt-Survived
- Symptom Related
- Theft/Loss
- Threat



Death & Suicide

Reference:

Policy 00-01: Quality Improvement/Peer Review of Cases in which Death has Resulted from Suicide, Homicide or Suspicious Cause

https://www.smchealth.org/bhrs-doc/qualityimprovementpeer-review-cases-which-death-has-resultedsuicide-homicide-or **Deaths -** Report all client deaths - by natural cause, homicide, suicide or unknown cause. No matter where the death occurs.

Type of Death

Accidental

Medical Condition

Natural Causes

Not Reported/Unknown Cause

Overdose-Accidental

Overdose-Suspected Suicide

Suicide- Hanging, Jumped, Other, Overdose, Train

BHRS conducts a peer review, led by the medical director of all deaths by suicide, homicide, or when suicide or homicide are suspected.

These meetings are protected by **Section 1157 of the California Evidence Code.**

DO NOT document these meetings in the chart.

Abuse, Threats, & Assault

Related Polices:

Managing Incidents With Potentially Violent or Suicidal Individual: Policy # 90-08

https://www.smchealth.org/bhrs-doc/potentially-violent-client-90-08 Assaults On Clients: Suspected or Reported: Policy # 01-03 https://www.smchealth.org/bhrs-doc/assaults-clients-suspected-or-reported-01-03

Duty to Protect and Duty to Warn Potential Victims: Policy # 93-08 https://www.smchealth.org/bhrs-doc/duty-warn-potential-victims-93-08

BHRS follows all mandated reporting requirements. However, NOT ALL mandated reporting of suspected child and elder abuse require a Critical Incident Report (except for CCL facilities must report all abuse to CCL and QM).

Critical Incident reports ARE required for the following:

Assault - directed at any staff person, visitor, or client at a BHRS site or during the course of work; any allegation of another professional assaulting or abusing a client.

Abuse Reporting that goes wrong - concerns like a lack of response from CPS/APS; any allegation of staff abusing a client; high risk or repeated abuse allegations going unaddressed by our partners.

Threats - steps taken (including alerting law enforcement, working with supervisors and staff, assisting family members, and people in the community) when it appears that the public, contract agencies, BHRS staff, or other clients may be in danger of assault.

Clients in residential, foster care, or board and care facilities - any allegation of assault, abuse, or threats in these facilities must be reported as soon as possible to BHRS.

5150s with Negative Outcomes

Related Polices:

72 Hour Hold/5150 Policy and Procedures: Policy # 93-07 https://www.smchealth.org/bhrs-doc/5150-procedures-93-07

Not every 5150 needs to be reported in a critical incident report.

These types of issues should be reported:

- Problem with the ambulance, police, or hospital.
- · Event occurs at a school site or in a public place.
- Parents or other people are very upset about the 5150.
- Involves a child that is very young (about 5-8 years old).
- Something else that worries you about the situation.

(CCL facilities must report all 5150s to CCL and QM).

Police Involvement

These incidents should be reported in a critical incident report:

- Theft of property belonging to a client, staff member or community member.
- Any illegal activity at a BHRS or agency site.
- Alleged or confirmed employee misconduct.
- Arrests of anyone at a BHRS or Contractor site.
- Client is arrested during a visit or in the course of your work.
- Any incident where police actions should be reviewed and/or evaluated.
- Any other police involved incident that you want to report.

Falls, Accidents, Thefts & Facility Safety

These incidents should be reported:

Facility Safety/Vandalism-

Fire, flood, or air safety
Facilities left unsecured overnight
Lost facility keys or key cards
Equipment malfunctions

Accidents -

Vehicle accident, falls or any injury involving a client, staff, volunteer or visitor

Anything that causes a safety risk.

Public Health Risks

Related Information:

https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/ReportableDiseases.pdf

Reporting Form:

https://www.smchealth.org/sites/main/files/file-attachments/cd-std cmr march 2018.pdf

Reporting obligations for communicable diseases are part of the Health Insurance Portability & Accountability Act (HIPAA). **This is part of our mandated reporting requirement.**

We are required to report communicable diseases such as syphilis or potentially positive cases and positive COVID-19 test results.

- A staff member who tests positive for COVID-19 and has been in contact with other staff, clients, or has been to your facility
- Reporting of Staff COVID Status will follow established HR Guidelines
- A client who tests positive for COVID-19 and has been in contact with staff, other clients, or has been to your facility
- Any report of a client who tests positive.
- Reports of a client death due to complications from COVID-19 (suspected or confirmed)

If you become aware of a client with a communicable disease, complete an incident report. The medical director will guide us in our reporting responsibilities.

The primary objectives of disease surveillance are:

- To protect the health of the public.
- To determine the extent of morbidity within the community.
- To evaluate the risk of transmission.
- To intervene rapidly when appropriate, to control and prevent the spread of disease.

Public Health Risks

Related Information:

https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/ReportableDiseases.pdf

https://www.smchealth.org/sites/main/files/file-attachments/cd-std_cmr_march_2018.pdf

<u>Title 17. California Code of Regulations (CCR) §2500, §2593, §2641.5-</u> 2643.20, and §2800-2812 Reportable Diseases and Conditions*

§ 2500. REPORTING TO THE LOCAL HEALTH AUTHORITY.

- § 2500(b) It shall be the duty of every health care provider, knowing of or in attendance on a case or suspected case of any of the diseases or condition listed below, to report to the local health officer for the jurisdiction where the patient resides. Where no health care provider is in attendance, any individual having knowledge of a person who is suspected to be suffering from one of the diseases or conditions listed below may make such a report to the local health officer for the jurisdiction where the patient resides.
- § 2500(c) The administrator of each health facility, clinic, or other setting where more than
 one health care provider may know of a case, a suspected case or an outbreak of disease
 within the facility shall establish and be responsible for administrative procedures to assure
 that reports are made to the local officer.
- § 2500(a)(14) "Health care provider" means a physician and surgeon, a veterinarian, a
 podiatrist, a nurse practitioner, a physician assistant, a registered nurse, a nurse midwife, a
 school nurse, an infection control practitioner, a medical examiner, a coroner, or a dentist.

URGENCY REPORTING REQUIREMENTS [17 CCR §2500(h)(i)]

- ⊘! = Report immediately by telephone (designated by a ♦ in regulations).
- † = Report immediately by telephone when two or more cases or suspected cases of foodborne disease from separate households are suspected to have the same source of illness (designated by a ◆ in regulations).
- = Report by telephone within one working day of identification (designated by a + in regulations).
- FAX ⊘⊠ = Report by electronic transmission (including FAX), telephone, or mail within one working day of identification (designated by a + in regulations).
 - WEEK = All other diseases/conditions should be reported by electronic transmission (including FAX), telephone, or mail within seven calendar days of identification.

REPORTABLE COMMUNICABLE DISEASES §2500(i)

Disease Name	Urgency	Disease Name	Urgency
Anaplasmosis	WEEK	Listeriosis	FAX ⊘⊠
Anthrax, human or animal	⊘!	Lyme Disease	WEEK
Babesiosis	FAX ⊘⊠	Malaria	FAX ⊘⊠
Botulism (Infant, Foodborne,	⊘!	Measles (Rubeola)	Øi
Wound, Other)			
Deveationin enimal (average	WEEK	Maninette Constitution Visal	EAV AB

Public Health Risks

Related Information:

https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/ReportableDiseases.pdf

Reporting Form:

https://www.smchealth.org/sites/main/files/file-attachments/cd-std cmr march 2018.pdf

State of California—Health and H	tuman Services A		ONFIDE	ENTIA	L MORI	BIDITY	REPORT		California Department of Public Hea
PLEASE NOTE	: Use this	form for re	porting all	conditio	ons except l	IIV/AIDS,	Tuberculosis, a	and con	ditions reportable to DMV.
DISEASE BEING	REPORT	TED 🔫	<u> </u>						
Patient Name - Last Name			First Name			М	Ethnicity (check of		Non-Hispanic/Non-Latino Unknow
Home Address: Number,	Street				Apt/Uni	t No.	Race (check all ti	_	_
City			State	ZIP	Code		African-Ame	rican/Blac	*
Home Telephone Number	Cell	Telephone Nu	ımber	Work 7	Telephone Num	ber	Asian (chec	k all that a	
Emeil Address			Prim		English	Spanish	Cambodii Chinese		Japanese Vietnamese Korean Other (specify
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☐ Male ☐ Female ☐ Trans male/transman ☐ Trans female/transwon	lder Dec	nderqueer or n ntity not listed clined to answe	(specify)		(check one) Male Female Declined:	to answer	Other (speci	ny /:	
Sexual Orientation (check	one)	ni ☐ Gay,id	esblan, or same	e gender lov				estioning/ ent doesn'	
Pregnant? ☐Yes ☐ No ☐ Unit		livery Date (m	m/dd/yyyy) Co	ountry of B					
Occupation or Job Title									ervice Day Care Health Care
Date of Onset (mm/bb/yyy)	0	Date of First	Specimen Co			Date of Diag	Other (specify)		Date of Death (mm/dd/yyyy)
Reporting Health Care Pro	ovider		Reporting Hea	olth Care Fi	acility				REPORT TO:
Address: Number, Street					Suite/Ur	nit No.	-		
City			State	ZIP	Code		1		
Telephone Number			Fax Number				1		
Submitted by			Date	Submitted	(mm/dd/yyyy)		(0)		s from your local health department.)
					City		(Cottain addition	State	ZIP Code
Laboratory Name									
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Medication Errors & Issues

Related Polices:

Medication Room Management: 99-03

https://www.smchealth.org/bhrs-doc/medication-

room-management-99-03

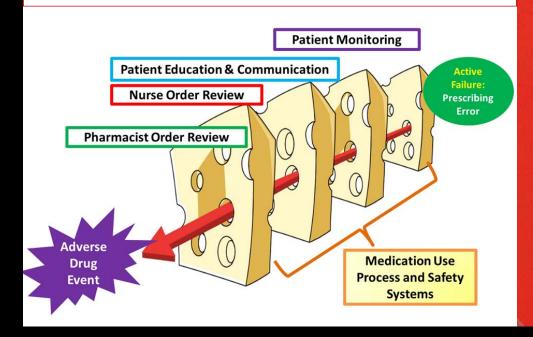
Medication Monitoring For Youth

https://www.smchealth.org/bhrs-policies/medication-monitoring-youth-20-07

Report medication errors or problems whether caused by client, staff, family or pharmacy.

It is everyone's responsibility to report medication issues, regardless If you are medical staff or not.

This is one of the largest risk areas for our clients. Complete the Critical Incident Report and inform the medical staff- ASAP.



Medication Errors & Issues

Related Polices:

Medication Room Management: 99-03

https://www.smchealth.org/bhrs-doc/medication-room-management-99-03

https://www.smchealth.org/bhrs-polic ies/medication-monitoring-youth-20-07

Types of Errors to Report:

Significant side effects needing medical care Incorrect Dose
Missing Medication
Refusal to take medication
Wrong Medication
Pharmacy Error

All pharmacy errors are reviewed by the BHRS Pharmacy Manager. In all cases, the pharmacy is contacted as the incident is reviewed.

(Residential facilities- CCL facilities must report all medication issues to CCL and QM)

Confidentiality & Security Breaches

Related Polices:

Confidentiality/Privacy Of Protected Health Information: Policy # 03-01(PHI): 03-01

https://www.smchealth.org/bhrs-

policies/confidentialityprivacy-protected-health-

information-phi-03-01

All breaches and data security incidents must be reported to Quality Management within <u>24 hours</u>. Some breaches are reportable to the State, and QM has strict timelines to report these breaches.

Breaches involving Social Security numbers MUST be reported immediately to QM.

Agencies must inform BHRS if they have any security breaches to their Electronic Health Record.

Common Type of Reported Breaches:

- Paperwork stolen, lost bag with PHI
- Car broken into laptop and papers stolen
- · Spoke to relative with no release from client
- Documents mailed or emailed to incorrect client
- · Document with PHI left in meeting room
- Missing laptop/lockbox with PHI
- Documents left in unsecure recycling bin
- Stolen laptop/planner with client PHI

When a client's Personal Health Information (PHI) is breached, steps must be taken to protect the client and inform the client of the breach.

Your supervisor will work with QM to determine if there has been a breach of confidentiality.

Confidentiality & Security Breaches

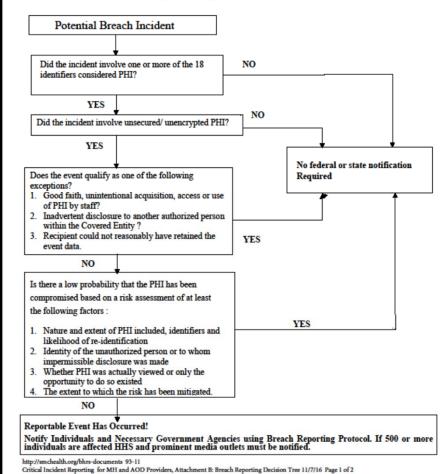
Related Polices:

QM follows this Breach Reporting Tree when deciding whether or not to report the breach to DHCS and/or HSA.

https://www.smchealth.org/bhrs-doc/critical-incident-reporting-93-11



Breach Reporting Decision Tree



General Staff Concerns & Client Issues

Staff may complete a Critical Incident Report for any behavior and/or issue that concerns them related to a client, contractor, visitor, or staff person.

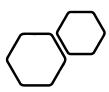
Staff or other Professionals - Reportable Issues: examples might include harassment, worry about program policies, and any other topics that they would like QM and management to be aware of.

Client Related - Reportable Issues: examples might include AWOL, wandering, using substances, sexual contact, disruptive behavior, self-harm, suicidal ideation, etc.

Residential facilities- CCL facilities must report all behaviors that might cause risk to any clients to CCL and QM.

Report any issues/events related to clinics or agencies (including staff members and clients) that may cause media attention.

Issues that Cause Media Attention



News BHRS is in the process to designing a new IR system. More to come.

Questions?

