



## CONSUMER SAFETY PLAN PROTOCOL

### GUIDING PRINCIPLE

We are committed to a culture of recovery throughout our systems of care, in our interactions with one another, and with those persons and families who trust us with their care.

### OVERVIEW

- DMHSA is committed to providing consumers with a safe environment that meets the needs of the each consumer and ensures the consumer the greatest amount of freedom and opportunity with the least amount of risk.
- DMHSA shall ensure the building and grounds are hazard free, clean, and in good repair

### STANDARDS OF CARE

- DMHSA Consumer Safety Plan is created to improve consumer safety, ensure treatment under safe conditions, and reduce risk to consumers through an environment that encourages:
  - Integration of safety priorities into all relevant Department processes, functions, services, divisions and programs
  - Recognition and acknowledgment of risks to consumer safety
    - The initiation of actions to reduce these risks
  - The internal and external reporting of what has been found and the actions taken
  - Learning about incidents
  - Support of the sharing of that knowledge to effect changes in itself
- The Consumer Safety Plan provides a systematic, coordinated and continuous approach to the maintenance and improvement of consumer safety through the establishment of mechanisms that support effective responses to potential or actual occurrences; ongoing proactive reduction in incidents; and integration of consumer safety priorities into the new design and redesign of all relevant departmental processes, functions and services.
- The maintenance and improvement of consumer safety, is a coordinated and collaborative effort. The approach to optimal consumer safety involves multiple divisions in establishing the plans, processes and mechanisms that comprise the consumer safety activities at DMHSA.

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- All divisions within the Department, consumer care and non-consumer care divisions, are responsible to report consumer safety occurrences and potential occurrences to their supervisor through the Department's incident reporting protocol.

### **PROTOCOL**

#### Scope of Activities:

- The scope of the Consumer Safety Plan includes ongoing proactive risk assessments, using internal and external knowledge and experience, to prevent incidents, maintain and improve consumer safety.
- Consumer safety occurrence information from aggregated data reports and individual incident reports will be reviewed by the QA officer to prioritize consumer safety activity efforts. Types of consumer safety or incidents included in data analysis are:
  - No Harm Incident - those unintended acts, either of omission or commission, or acts that do not achieve their intend outcome - that do not result in a physical or psychological negative outcome, or the potential for a negative outcome, for the consumer.
  - Mild-Moderate Adverse Outcome Incident - those unintended acts, either of omission or commission, or acts that do not achieve their intend outcome, that result in an identified mild to moderate physical or psychological adverse outcome for the consumer.
  - Any Medication Error
  - Any Adverse Drug Reaction
  - Sentinel Event
- The scope of the Consumer Safety Plan encompasses the consumer population, visitors, and staff. The plan addresses maintenance and improvement in consumer safety issues throughout the Department.

#### QA Officer Responsibilities:

- The Quality Assurance (QA) officer is responsible for the oversight of the Consumer Safety Program.
- Quarterly the QA officer will prepare a report based on the incident repots.
  - The QA will analyze the report information and determine further consumer safety activities as appropriate.

#### Incidents:

- When an incident involving a consumer occurs, a provider shall immediately:

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- Perform necessary healthcare interventions to protect and support the consumer's clinical condition.
- As appropriate to the occurrence, perform necessary healthcare interventions to contain the risk to others.
  
- Contact the consumer's attending physician and other physicians, as appropriate, to report the incident, carrying out any physician orders as necessary.
  
- Preserve physical evidence related to the incident.
  
- Report the incident to the observing staff member's immediate supervisor.
  
- Submit the incident report form to the staff member's immediate supervisor per the Incident Reporting Protocol.

### Response to Particular Incidents:

Staff response to incidents is dependent upon the type of incident identified:

- No Harm Failures or Incidents (including "no harm" medication errors) - staff will document appropriately in the medical record according to Department protocol, document the circumstances regarding the no harm incident on an incident report form, submit the form to their immediate supervisor.
  
- Mild-Moderate Adverse Outcome Failures or Incidents (including medication errors) and Adverse Drug Reaction- staff will perform any necessary clinical interventions to support and protect the consumer and notify the physician staff responsible for the consumer, carrying out any necessary physician orders. Staff will then preserve any physical evidence as appropriate, notify his/her immediate supervisor, document facts appropriately in the medical record and on an incident report - submitting the report to their immediate supervisor.
  
- Hazardous Condition/Consumer Safety Issue - as appropriate, and if possible, staff will contain the hazardous condition or consumer safety issue. Staff identifying a hazardous condition or potential consumer safety issue will immediately notify his or her supervisor and document the findings on an incident report. The incident report will be submitted to their immediate supervisor.
  
- Sentinel Event - staff will perform any necessary clinical interventions to support and protect the consumer and notify the physician staff responsible for the consumer, carrying out any necessary physician orders. Staff will then follow the Department's Sentinel Event Protocol.
  - All sentinel events will have a root cause analysis conducted. Internal and external data can be used to as a tool to analyze incidents.

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## Reporting Incidents:

- An effective Consumer Safety Program cannot exist without optimal reporting of incidents. Therefore, it is the intent of DMHSA to adopt a non-punitive approach in its management of failures, incidents and occurrences.
- All staff are required to report suspected and identified incidents, and should do so without the fear of reprisal in relationship to their employment.
- DMHSA supports the concept that incidents occur due to a breakdown in systems and processes, and will focus on improving systems and processes, rather than disciplining those responsible for incidents and occurrences.
  - The focus will be placed on remedial actions to assist rather than punish staff members to prevent incident recurrence.

## Sentinel Events:

- Staff members involved in a sentinel event occurrence will receive support from their supervisor regarding the staff member's professional and emotional reconciliation of the sentinel event.
  - The QA officer encourages the staff member's involvement in the root cause analysis and action plan processes, to allow the staff member an active role in process resolution.
  - Additionally, any staff member involved in a sentinel event or other incident may request and receive supportive counseling.

## Staff Concerns:

- As part of DMHSA's culture of safety and quality, any staff member who has concerns about the safety or quality of care provided by the Department may report these concerns to their supervisor.
- DMHSA supports the staff member's right to report these concerns and will take no disciplinary or retaliatory action against the staff member for reporting the safety or quality of care concern to their supervisor.

## Quality Management:

- The Consumer Safety Program includes surveys of consumer and their families, opinions, needs and perceptions of risks to consumers and requests suggestions for improving consumer safety.
- Staff will educate consumers and their families about their role in helping to facilitate the safe delivery of care.
- Staff will receive education and training from the safety officer and other relevant disciplines during their initial orientation process and on an ongoing basis regarding job-related aspects of consumer safety.

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## REFERENCES

- Amended Permanent Injunction filed June 30, 2005
- TJC LD.04.04.05

APPROVED: 	Date: 
_____ Wilfred Aflague Director	_____