2008 Negley Awards for Excellence in Risk Management

Developing a Five Component Risk Management Program in a Behavioral Health Organization

Milestone Centers, Inc., Recipient of the Chairman's Award

INTRODUCTION

The risk management program of Milestone Centers, Inc. (Milestone) was not created in response to a particular incident but as a proactive approach to decrease costly events in all aspects of the agency. In order to provide quality recovery based treatment to consumers, Milestone has to account for all risk events that may interrupt the provision of services. Realizing that we could not completely predict and/ or prevent risk events from occurring, Milestone set forth a proactive approach to develop and implement a comprehensive risk management program. By positioning ourselves on the threshold of this proactive approach, Milestone has developed a five-component risk management program that promotes safety, accountability, and a continuous improvement process. The implementation of the risk management program has had a profound effect on the quality of service provision, ensuring effective operation of the agency, and improving the safety of our associates and consumers.

Milestone initiated an intensive data collection process of the existing risk management processes to identify areas of concern. Through the collection of internal data and communication with insurance companies, workers compensation, and State/County mandated incident reporting, several areas of concern were identified. Milestone initiated a three staged process to address the areas of concern. The three stages included: (1) establish an "oversight" committee, (2) develop and implement a five component risk management program, and (3) create a culture of life safety and risk management among the associates and consumers.

Stage 1 - Oversight Committee:

The Risk Management Committee (RMC) was formed to be the oversight committee that reports to the Executive Director and the Board of Directors. The RMC is comprised of a diverse cross-section of associates to ensure all areas and services are represented. The RMC is charged with one task - develop an agency wide risk management program. The RMC established a five-component risk management program through utilization of existing resources by redefining roles and implementing a highly specified organizational structure. Operation of the components was based on the following parameters: report directly to the RMC, have targeted goals/ interventions, meet on a regular basis, maintain a diverse associate representation, and be held accountable for establishing, implementing, and maintaining risk management directives. Representatives from the RMC also participated directly in at least one of the five components so as to provide assistance, direction, and expedited communication.

Stage 2 - Five Components of the Risk Management Program:

I. *Incident Management Committee (IMC):*

The IMC was created for two primary reasons. (1) To establish a system of reporting and reviewing incidents in the agency and (2) to develop and implement preventative and proactive measures. The IMC was able to identify trends, assess isolated incidents, and triage the information to the appropriate committees for the development and implementation of interventions. The IMC established policies and procedures on the reporting of incidents, trained supervisory associates on the process, and established standardized incident report forms that are accessible to all staff through the agency computer network system (Attachment A*). The IMC is currently in the process of developing an electronic incident management system through the agency's computer network system that will allow the IMC to input incidents, trend and analyze data to aid in quality improvement.

II. *Policy and Procedures Workgroup (PPW):*

The PPW was established to create accountability, establish a standard format that ensures policies contain highly specified instructions and that all policies are accessible to all associates. The PPW works in tangent with the other four components, distributes and trains associates on the policies and procedures, ensures that all polices and procedures are current, and converts the policies and procedures to an electronic format so associates are able to access them through the agency computer network system..

III. *Health and Safety Committee (HSC):*

The HSC was originally formed as a requirement under the workers compensation laws. The initial objective was to track and monitor workers compensation claims. The HSC working in tangent with the RMC established the following mission: *The mission of the Health Safety Committee is to promote safe workplace practices.* The Committee provides education and training on safety practices to associates, monitors and reports safety practices and results, recommends changes in agency practices and/or facilities, and develops/ implements safety policies. The HSC is responsible for compliance with license and insurance requirements, studies and analyzes accident data to determine trends, recommends and provides associate education and training, addresses associate safety or health hazard complaints and/ or concerns, establishes procedures for workplace inspections for the purpose of locating, and identifying and correcting safety and/or health hazards. Currently the HSC is working on the distribution of Material Safety Data Sheets books to all sites, the development and implementation of site-specific consumer initiated crisis response protocols (Attachment B*) and an agency wide vehicle fleet management system.

IV. *Quality Assurance Committee (QAC)*

The Quality Management plan was written in 2004 and the QAC was formed shortly after to implement an agency wide Quality Assurance (QA) process in which each department establishes goals and reports the progress of the goals to the QAC for monitoring, evaluation, and feedback. The QA process was the vehicle by which individual department based objectives were completed. The QAC continues to meet on a quarterly basis to review each department's progress.

V. *Corporate Compliance Committee (CCC).*

The CCC was lead by the Corporate Compliance Officer (CCO). The CCC interacts with the four other components and meets on an as needed basis to address issues and make revisions to the Corporate Compliance Plan and Policy. The Corporate Compliance Plan and Policy ensures conformity with all ethical standards integrity, agency policies and public trust, as well as federal, state and local laws, rules, and regulations.

Involving the CCC in the Risk Management process ensured that all directives taken are within the scope of the Corporate Compliance Plan and Policy. This involvement also resulted in an expansion of the new employee orientation process. All new employees complete the orientation process before being permitted to work at their designated locations. The orientation process was expanded to include a comprehensive HIPAA training and testing program, drug screening, orientation to the agency polices and procedures, issuing photo IDs and a review of the employee handbook. In addition to the new employee orientation process all staff received additional Corporate Compliance training, a compliance hotline number was implemented, and compliance suggestion boxes were placed in agency sites.

Stage 3 - Creating a Culture of Life Safety and Management Risk:

A core component of the risk management program is to instill a culture of life safety among associates and consumers. Representatives from the five components regularly complete safety and risk training, work directly with individual managers to address areas indicated via trend analysis, provide feedback and suggestions from reported incidents to avoid future occurrence, follow up on suggestions provided via the suggestions boxes and hotline, publish safety tips in the monthly agency newsletter, implement bi-annual site safety inspections, implement a quarterly safety award process (in which all sites that had no injuries over the quarter received a certificate to display in the site and staff incentives), and ensure that managers provided an open forum for front line staff to communicate concerns and suggestions for improvement. Consumers were provided with information on how to report concerns, the problem resolution process and their rights during treatment (and the HIPAA provisions). This information was also publicly displayed in all sites so that consumers could reference it at any time.

OUTCOMES

Implementation of the risk management program at Milestone has produced the following outcomes:

Fiscal: Annual audits have produced zero citations and no monies have had to be restored to payers.

Corporate Compliance Officer: The CCO has not had to intervene in any compliance issues and tracking showed that all compliance concerns were addressed and resolved by the appropriate risk management components.

Consumer HIPAA Survey: Consumers were surveyed in regard to Milestone ensuring the privacy of their information: 91% responded that Milestone maintains their privacy, 8.6% indicated room for improvement, and .04% did not respond. The common comment in regard to improvement was that communication of Social Security Numbers and other identifying information should be done in writing between the two parties in lieu of verbalizing the information.

Workers Compensation: Annual Workers Compensation Insurance cost decreased from $193,442 in 2005 to $167,598 in 2007. ($25,844 decrease in cost) The total number of injuries also decreased from 54 in 2005 to 51 in 2007 (1/1/07 - 11/1/07)

Customer Service: An independent agency, commissioned by the County, surveyed our consumers about improvements that could be made. Milestone received 100% satisfaction in the areas of *acceptance, perceived choice, and overall satisfaction..* An 85% satisfaction score was received in the area of *information provided* due to consumers not being satisfied with the amount of information being provided on the complaint/grievance process and information on medication side effects. Milestone rapidly implemented a quality improvement process to address these concerns. (Attachment C*)

CONCLUSION

Through utilization of existing resources within the agency, establishing the proactive five-component system, and instilling a culture of life safety awareness the risk management program has become a cornerstone of Milestone. The program provides flexibility, trend analysis, and indicates areas of concern that provides the agency with the ability to respond, predict, and prevent risk events. Currently Milestone is increasing consumer involvement in the process, front line staff participation in the components, and employing new technologies. This will allow the RMC to better identify and respond to targeted areas. Risk never sleeps, and neither shall we. ❖

Overview
Milestone Centers, Inc.

Milestone is a community based behavioral health provider in western Pennsylvania that offers comprehensive services to people with behavioral and intellectual challenges. Milestone has been in operation for over 38 years, employs more than 400 individuals, and annually services over 3,500 consumers located throughout 20 counties in Pennsylvania. Services include outpatient treatment, comprehensive clinical services, day programming, residential programs, home based services, employment training, case management, workshop and horticulture based industries, an art gallery, a consumer operated drop in center, and specialized deaf services. Our strong community presence and commitment to excellence has earned us the reputation as a premier provider in the region. CEO of Milestone is Barbara Conniff. Program Manager is Victoria Livingstone. *For additional information, including referenced attachments, contact Milestone at 412-377-7391 (ext. 39).