

Sentinel Events (SE)

I. Sentinel Events

The Joint Commission adopted a formal Sentinel Event Policy in 1996 to help critical access hospitals that experience serious adverse events improve safety and learn from those sentinel events. Careful investigation and analysis of patient safety events, as well as **strong corrective actions that provide effective and sustained system improvement**, is essential to reduce risk and prevent patient harm. The Sentinel Event Policy explains how The Joint Commission partners with critical access hospitals that have experienced a serious patient safety event to protect the patient, improve systems, and prevent further harm.

Definition of Sentinel Event

A sentinel event is a patient safety event (not primarily related to the natural course of the patient's illness or underlying condition) that reaches a patient and results in any of the following:

- Death
- Permanent harm
- Severe temporary harm*

An event is also considered sentinel if it is one of the following:

- Suicide of any patient receiving care, treatment, or services in a staffed around-the-clock care setting or within 72 hours of discharge, including from the critical access hospital's emergency department (ED)
- Unanticipated death of a full-term infant
- Discharge of an infant to the wrong family
- Abduction of any patient receiving care, treatment, or services

Severe temporary harm* is critical, potentially life-threatening harm lasting for a limited time with no permanent residual, but requires transfer to a higher level of care/monitoring for a prolonged period of time, transfer to a higher level of care for a life-threatening condition, or additional major surgery, procedure, or treatment to resolve the condition. **Source: Throop C, Stockmeier C. *The HPI SEC & SSER Patient Safety Measurement System for Healthcare*. 2011 May. Accessed Aug 12, 2014. <http://hpiresults.com/publications/HPI%20White%20Paper%20-%20SEC%20SSER%20Measurement%20System%20REV%202%20MAY%202010.pdf>.

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- Any elopement (that is, unauthorized departure) of a patient from a staffed around-the-clock care setting (including the ED) leading to the death, permanent harm, or severe temporary harm of the patient
- Hemolytic transfusion reaction involving administration of blood or blood products having major blood group incompatibilities (ABO, Rh, other blood groups)
- Rape, assault (leading to death, permanent harm, severe temporary harm, or intervention required to sustain life), or homicide of any patient receiving care, treatment, or services while on site at the critical access hospital[†]
- Rape, assault (leading to death, permanent harm, severe temporary harm, or intervention required to sustain life), or homicide of a staff member, licensed independent practitioner, visitor, or vendor while on site at the critical access hospital
- Invasive procedure, including surgery, on the wrong patient, at the wrong site, or that is the wrong unintended procedure[‡]
- Unintended retention of a foreign object in a patient after an invasive procedure, including surgery[§]
- Severe neonatal hyperbilirubinemia (bilirubin >30 milligrams/deciliter)
- Prolonged fluoroscopy with cumulative dose >1,500 rads to a single field or any delivery of radiotherapy to the wrong body region or >25% above the planned radiotherapy dose
- Flame, or unanticipated smoke, heat, or flashes occurring during an episode of patient care

[†]Sexual abuse/assault (including rape) as a sentinel event, is defined as nonconsensual sexual contact involving a patient and another patient, staff member, or other perpetrator while being treated or on the premises of the critical access hospital, including oral, vaginal, or anal penetration or fondling of the patient's sex organ(s) by another individual's hand, sex organ, or object. One or more of the following must be present to determine that it is a sentinel event:

- Any staff-witnessed sexual contact as described above
- Admission by the perpetrator that sexual contact, as described above, occurred on the premises
- Sufficient clinical evidence obtained by the critical access hospital to support allegations of unconsented sexual contact

[‡]Invasive procedures, including surgery, on the wrong patient, or at the wrong site, or that is the wrong procedure are reviewable under the policy, regardless of the type of the procedure or the magnitude of the outcome.

[§]If a foreign object (for example, a needle tip or screw) is left in the patient because of a clinical determination that the relative risk to the patient of searching for and removing the object exceeds the benefit of removal, this would not be considered a sentinel event to be reviewed. However, in such cases, the organization shall (1) disclose to the patient the unintended retention, and (2) keep a record of the retentions to identify trends and patterns (for example, by type of procedure, by type of retained item, by manufacturer, by practitioner) that may identify opportunities for improvement.

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- Any intrapartum (related to the birth process) maternal death
- Severe maternal morbidity (not primarily related to the natural course of the patient’s illness or underlying condition) when it reaches a patient and results in any of the following: Permanent harm or severe temporary harm^{||}

The above list is consistent across all Joint Commission accreditation programs, though some of these events may be unlikely to occur in certain settings. In cases in which the critical access hospital is uncertain that a patient safety event is a sentinel event as defined by The Joint Commission, the event will be presumed to be a sentinel event and the hospital’s response will be reviewed under the Sentinel Event Policy according to the prescribed procedures and time frames.

Such events are considered “sentinel” because they signal a need for immediate investigation and response. **All sentinel events must be reviewed by the critical access hospital and are subject to review by The Joint Commission.** Accredited critical access hospitals are expected to identify and respond appropriately to all sentinel events (as defined by The Joint Commission) occurring in the critical access hospital or associated with services that the critical access hospital provides. An appropriate response includes all of the following:

- A formalized team response that stabilizes the patient, discloses the event to the patient and family, and provides support for the family as well as staff involved in the event
- Notification of critical access hospital leadership
- Immediate investigation
- Completion of a comprehensive systematic analysis for identifying the causal and contributory factors
- Strong corrective actions that provide effective and sustained system improvement
- Time line for implementation of corrective actions
- Systemic improvement

^{||} *Severe maternal morbidity* is defined, by the American College of Obstetrics and Gynecology, the US Centers for Disease Control and Prevention, and the Society of Maternal-Fetal Medicine, as a patient safety event that occurs intrapartum through the immediate postpartum period (24 hrs), that requires the transfusion of 4 or more units of packed red blood cells and/or admission to the intensive care unit (ICU). Facilities are strongly encouraged to review all cases of severe maternal morbidity for learning and improvement. *Admission to the ICU* is defined as admission to a unit that provides 24-hour medical supervision and is able to provide mechanical ventilation or continuous vasoactive drug support.

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Sentinel events are one category of patient safety events. A *patient safety event* is an event, incident, or condition that could have resulted or did result in harm to a patient. A patient safety event can be, but is not necessarily, the result of a defective system or process design, a system breakdown, equipment failure, or human error. Patient safety events also include adverse events, no-harm events, close calls, and hazardous conditions, which are defined as follows:

- An *adverse event* is a patient safety event that resulted in harm to a patient
- A *no-harm event* is a patient safety event that reaches the patient but does not cause harm.
- A *close call* (or “near miss” or “good catch”) is a patient safety event that did not reach the patient.
- A *hazardous* (or “unsafe”) *condition(s)* is a circumstance (other than a patient’s own disease process, or condition) that increases the probability of an adverse event.

The hospital determines how it will respond to patient safety events that do not meet **The Joint Commission's** definition of sentinel event. Adverse events shall prompt notification of hospital leaders, investigation, and corrective actions, in accordance with the hospital’s process for responding to patient safety events that do not meet the definition of sentinel event. An adverse event may or may not result from an error.

No-harm events, close calls, and hazardous conditions are tracked and used as opportunities to prevent harm, in accordance with the hospital’s process for responding to patient safety events that do not meet the definition of sentinel event. (*See also* Leadership [LD] Standard **LD.04.04.05**, element of performance [EP] 3, which states: The scope of the safety program includes the full range of safety issues, from potential or no-harm errors [sometimes referred to as near misses, close calls, or good catches] to hazardous conditions and sentinel events.)

II. Goals of the Sentinel Event Policy

The policy has the following four goals:

1. To have a positive impact in improving patient care, treatment, and services and in preventing unintended harm
2. To focus the attention of a critical access hospital that has experienced a sentinel event on understanding the factors that contributed to the event (such as underlying causes, latent conditions and active failures in defense systems, or critical access hospital culture), and on changing the critical access hospital’s culture, systems, and processes to reduce the probability of such an event in the future

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3. To increase the general knowledge about patient safety events, their contributing factors, and strategies for prevention
4. To maintain the confidence of the public, clinicians, and critical access hospitals that patient safety is a priority in accredited critical access hospitals

III. Responding to Sentinel Events

Standards

Each Joint Commission accreditation manual contains standards that relate specifically to the management of sentinel events.

Standard **LD.04.04.05**, element of performance (EP) 7, requires each accredited critical access hospital to define patient safety event for its own purposes and to communicate this definition throughout the critical access hospital. This definition must encompass sentinel events as defined by The Joint Commission. An accredited critical access hospital is encouraged to include in its definition events, incidents, and conditions in which no or only minor harm occurred to a patient. The critical access hospital determines how it will respond to patient safety events that do not meet the definition of sentinel event.

In addition, Rights and Responsibilities of the Individual (RI) Standard **RI.01.02.01**, EP 21, requires an accredited critical access hospital to inform the patient or surrogate decision-maker about unanticipated outcomes of the care, treatment, and services that relate to sentinel events as defined by The Joint Commission. EP 22 of that standard specifies that the licensed independent practitioner who is responsible for managing the patient's care, treatment, and services (or his or her designee) must inform the patient about unanticipated outcomes of care, treatment, and services that relate to sentinel events when the patient is not already aware of the occurrence or when further discussion is needed.

Comprehensive Systematic Analysis

As indicated above, appropriate response to a sentinel event includes the completion of a comprehensive systematic analysis for identifying the causal and contributory factors. Root cause analysis, which focuses on systems and processes, is the most common form of comprehensive systematic analysis used to identify the factors that underlie a sentinel event.

A critical access hospital may use other tools and methodologies to conduct its comprehensive systematic analysis. The Joint Commission encourages a critical access hospital to contact the patient safety specialist assigned to the hospital's event or to call The Joint Commission Office of Quality and Patient Safety at 630-792-3700 if it has questions regarding using the tools discussed above or other tools it is considering.

Action Plan

The product of the comprehensive systematic analysis is an action plan. The action plan identifies the strategies that the critical access hospital intends to implement in order to reduce the risk of similar events occurring in the future. The plan must address the following:

- Identification of corrective actions to eliminate or control system hazards or vulnerabilities directly related to causal and contributory factors
- Responsibility for implementation
- Time lines for implementation
- Strategies for evaluating the effectiveness of the actions
- Strategies for sustaining the change

Reporting a Sentinel Event to The Joint Commission

Each critical access hospital is strongly encouraged, but not required, to report to The Joint Commission any patient safety event that meets the Joint Commission definition of sentinel event. A critical access hospital benefits from self-reporting in the following ways:

- The Joint Commission can provide support and expertise to the critical access hospital during the review of a sentinel event.
- A review with The Joint Commission Office of Quality and Patient Safety provides the opportunity for the critical access hospital to collaborate with a patient safety specialist who is likely to have reviewed similar events.
- Reporting raises the level of transparency in the critical access hospital and helps promote a culture of safety.
- Reporting conveys the critical access hospital's message to the public that it is doing everything possible, proactively, to prevent similar patient safety events in the future.

Further, reporting the event enables the addition of the “lessons learned” from the event to be added to The Joint Commission’s Sentinel Event Database, thereby contributing to the general knowledge about sentinel events and to the reduction of risk for such events in many other critical access hospitals.

The value of this review is reflected by the fact that more than 75% of sentinel events reported to The Joint Commission are self-reported by the critical access hospitals that experienced the events. Alternatively, The Joint Commission may become aware of a sentinel event by some other means such as communication from a patient, a family member, an employee of the critical access hospital, a surveyor, or through the media. Self-reporting a sentinel event is not required and there is no difference in the expected response, time frames, or review procedures, whether the critical access hospital voluntarily reports the event or The Joint Commission becomes aware of the event by some other means. If a critical access hospital wishes to report a sentinel event to The Joint Commission, it will be asked to complete a form accessible through its *Joint Commission Connect™* extranet site. From this site, place the cursor over “Continuous Compliance Tools.” A dropdown list will appear. From this list, select “Self Report Sentinel Event.”

If The Joint Commission becomes aware of a sentinel event that was not reported by the critical access hospital to The Joint Commission, the critical access hospital’s CEO (or designee) is contacted, and a preliminary assessment of the sentinel event is made. An event that occurred more than one year before the date The Joint Commission became aware of the event will not, in most cases, be reviewed under the Sentinel Event Policy. In such a case, a written response will be requested from the critical access hospital, including a summary of the processes that were designed to prevent similar occurrences.

Required Response to a Sentinel Event

All sentinel events must be reviewed by the critical access hospital, whether or not they are reported to The Joint Commission. In addition, if The Joint Commission becomes aware (either through voluntary self-reporting or otherwise) of a sentinel event that meets the criteria of this policy and the event has occurred in an accredited critical access hospital, the critical access hospital is expected to do the following:

- Prepare a thorough and credible comprehensive systematic analysis and action plan within 45 business days of the event or of becoming aware of the event.

- Submit to The Joint Commission its comprehensive systematic analysis and action plan, or otherwise provide for Joint Commission evaluation its response to the sentinel event using an approved methodology within 45 business days of the known occurrence of the event. The Joint Commission will determine whether the comprehensive systematic analysis and action plan are acceptable.

The fact that a critical access hospital has experienced a sentinel event will not impact its accreditation decision. However, willful failure to respond appropriately to the sentinel event could have such an impact. For instance, if the critical access hospital fails to submit a comprehensive systematic analysis within an additional 45 days following its due date, its accreditation decision may be impacted. In these instances, staff in the Office of Quality and Patient Safety would recommend that the Accreditation Committee of the Joint Commission's Board of Commissioners change the critical access hospital's accreditation status.

Submission of Comprehensive Systematic Analysis and Action Plan

A critical access hospital that reports a sentinel event must submit the comprehensive systematic analysis, including the resulting action plan that describes the critical access hospital's risk reduction strategies as well as how the effectiveness of those strategies will be evaluated. This information is submitted electronically and will be reviewed in a conference call involving Joint Commission staff and critical access hospital staff. Documents shall not include the names of caregivers and patients involved in the sentinel event.

If the critical access hospital has concerns about waiving confidentiality protections as a result of sending the comprehensive systematic analysis documents to The Joint Commission, the following four optional alternative approaches to a review of the critical access hospital's response to the sentinel event are acceptable:

1. A review of the root cause analysis and action plan documents brought to Joint Commission headquarters by critical access hospital staff, then taken back to the critical access hospital on the same day. This can also be performed via web-based video conferencing with a patient safety specialist who is located at The Joint Commission. When the web-based video conference is used, the critical access hospital's participants remain at the critical access hospital.

2. An on-site meeting at the critical access hospital with a Joint Commission patient safety specialist to review the comprehensive systematic analysis and action plan. This can also be performed via web-based video conferencing with a Patient Safety Analyst who is located at The Joint Commission.
3. An on-site review with a Joint Commission patient safety specialist to review the action plan and relevant documentation. The patient safety specialist may ask questions regarding the comprehensive systematic analysis, but will not review that document itself. For purposes of this review activity, *relevant documentation* includes, at a minimum, any documentation relevant to the critical access hospital's process for responding to sentinel events, and the action plan resulting from the analysis of the sentinel event. The action plan serves as the basis for determining appropriate follow-up activity. This can also be performed via web-based video conferencing with a patient safety specialist who is located at The Joint Commission.
4. An on-site visit by a specially trained surveyor arranged to conduct the following:
 - a. Interview and review of relevant documentation, including, if applicable, the patient's medical record, to evaluate the following:
 - The process the critical access hospital uses in responding to sentinel events
 - The relevant policies and procedures preceding and following the critical access hospital's review of the specific event, and the implementation thereof, sufficient to permit inferences about the adequacy of the critical access hospital's response to the sentinel event
 - b. A standards-based survey that traces a patient's care, treatment, and services and the critical access hospital management functions relevant to the sentinel event under review.

Each of these options will result in a fee to the critical access hospital to cover the average direct costs of the option. Inquiries about the fee should be directed to the Joint Commission's Pricing Unit at 630-792-5115.

The Joint Commission must receive a request for review of a critical access hospital's response to a sentinel event using any of these options within five business days of the self-report of a sentinel event or of the initial communication by The Joint Commission to the critical access hospital that it has become aware of a sentinel event.

Review of Comprehensive Systematic Analyses and Action Plans

A comprehensive systematic analysis will be reviewed for thoroughness, credibility, and acceptability. A critical access hospital's comprehensive systematic analysis should identify system vulnerabilities so that they can be eliminated or mitigated. The analysis should not focus on individual health care worker performance, but should seek out underlying systems-level causations that were manifest in personnel-related performance issues.[#] To help adhere to these characteristics it is recommended but not required that the following guidelines be considered when developing causative factor statements:^{**}

- Clearly show the cause-and-effect relationship.
- Use specific and accurate descriptors for what occurred, rather than negative and vague words.
- Human errors must have a preceding cause.
- Violations of procedure are not root causes, but must have a preceding cause.
- Failure to act is only causal when there is a preexisting duty to act.

To be **thorough**, the comprehensive systematic analysis must include the following:

- The analysis repeatedly asks a series of “Why” questions, until it identifies the systemic causal factors associated with each step in the sequence that led to the sentinel event
- The analysis focuses on systems and processes, not solely on individual performance
- A determination of the human and other factors most directly associated with the sentinel event and the process(es) and systems related to its occurrence
- The analysis of the underlying systems and processes through the series of “Why” questions determines where redesign might reduce risk
- An inquiry into all areas appropriate to the specific type of event
- An identification of risk points and their potential contributions to this type of event
- A determination of potential improvement in processes or systems that would tend to decrease the likelihood of such events in the future, or a determination, after analysis, that no such improvement opportunities exist

[#]National Patient Safety Foundation. *RCA2: Improving Root Cause Analyses and Actions to Prevent Harm*. Boston: National Patient Safety Foundation, 2015.

^{**}Department of Veterans Affairs. *Veterans Health Administration Patient Safety Handbook 1050.01*. Mar 4, 2011. Accessed Feb 11, 2015. http://www.va.gov/vhapublications/ViewPublication.asp?pub_ID=2389.

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To be **credible**, the comprehensive systematic analysis must do the following:

- Include participation by a process owner, who is not a member of the response team; typically this is a senior leader of the critical access hospital or a designee^{††}
 - Each action recommended by a review team should be approved or disapproved, preferably by the CEO or alternatively by another relevant member of top management. If an action is disapproved, the reason for its disapproval should be shared with the comprehensive systematic analysis and action team so that the constraint can be understood and another developed by the team to replace it if the system vulnerability is not otherwise effectively addressed in the action plan.^{‡‡}
- Include patients, family, or patient representatives when appropriate to ensure a thorough understanding of the facts
- Include individuals most closely involved in the processes and systems under review
- Be internally consistent (that is, not contradict itself or leave obvious questions unanswered)
- Provide an explanation for all findings of “not applicable” or “no problem”
- Include a bibliography of any relevant literature

An action plan will be considered **acceptable** if it does the following:

- Identifies and implements actions to eliminate or control systems hazards or vulnerabilities
- It is recommended but not required that review teams should attempt to identify actions that are likely to reduce the risk or prevent the event from recurring and if that is not possible, reduce the severity or consequences if it should recur.
- It is recommended that the review team use a tool that will assist in identifying stronger actions that provide effective and sustained system improvement. A tool such as the Action Hierarchy can help organizations evaluate the strength of the corrective actions identified in their comprehensive systematic analysis. The US Department of Veterans Affairs National Center for Patient Safety developed this tool in 2001.^{§§}

^{††}A senior leader is not necessarily required to be actively involved in the day-to-day work of the comprehensive systematic analysis team. However, the team should report to the senior leader or designee, and he or she should be involved in deciding or approving the actions the critical access hospital will take as a result of the comprehensive systematic analysis and action plan.

^{‡‡}National Patient Safety Foundation. *RCA2: Improving Root Cause Analyses and Actions to Prevent Harm*. Boston: National Patient Safety Foundation, 2015.

^{§§}An example of the Action Hierarchy tool are available at http://www.patientsafety.va.gov/docs/joel/rca_tools_2_15.pdf, page 28.

- Identifies, in situations in which improvement actions are planned, who is responsible for implementation, when the action will be implemented, how the effectiveness of the actions will be evaluated, and how the actions will be sustained
- Identifies at least one stronger or intermediate strength action for each comprehensive systematic analysis

All comprehensive systematic analyses and action plans will be considered and treated as confidential by The Joint Commission.

Follow-up Activities

After The Joint Commission has determined that a critical access hospital has conducted an acceptable comprehensive systematic analysis (for example, root cause analysis) and developed an acceptable action plan, The Joint Commission will notify the critical access hospital that the comprehensive systematic analysis and action plan are acceptable and will assign an appropriate follow-up activity. This will be a mutually agreed-upon documentation of sustained improvement and reduction of risk, which may include one or more Sentinel Event Measure(s) of Success (SE MOS).

IV. The Sentinel Event Database

The third goal of the Sentinel Event Policy is to increase the general knowledge about patient safety events, their contributing factors, and strategies for prevention. To achieve this, The Joint Commission collects and analyzes data from the review of sentinel events, and their comprehensive systematic analyses, action plans, and follow-up activities. These data and information comprise the content of the Joint Commission's Sentinel Event Database.

The Sentinel Event Database is also a major component of the evidence base for developing and maintaining the Joint Commission's National Patient Safety Goals. The database also informs the development prevention advice to critical access hospitals through *Sentinel Event Alert* or other media. For these purposes, The Joint Commission uses de-identified aggregate data relating to root causes, contributing factors, and risk-reduction strategies. The Joint Commission is committed to developing and maintaining this Sentinel Event Database in a fashion that will protect the confidentiality of the critical access hospital, the caregiver, and the patient.

V. Determination That a Sentinel Event Is Subject to Review

Based on available information received about the event, Joint Commission staff will determine whether an event meets the definition in Section I, and is therefore a sentinel event. Challenges to a determination that an event is a sentinel event will be resolved through discussions between senior Joint Commission staff and senior critical access hospital leaders.

VI. Optional On-Site Review of a Sentinel Event

An initial on-site review of a sentinel event will usually not be conducted unless it is determined that a potential ongoing Immediate Threat to Health or Safety exists. An *Immediate Threat to Health or Safety* is a threat that represents the most immediate risk and has or may potentially have serious adverse effects on the health or safety of patients. All potential Immediate Threats to Health or Safety are referred to Joint Commission executive leadership for authorization to conduct an unannounced on-site for-cause survey. If an on-site review is conducted, the critical access hospital will be billed a sufficient charge, based on an established fee schedule, to cover the costs of conducting such a survey.

VII. Disclosable Information

If The Joint Commission receives an inquiry about the accreditation decision of a critical access hospital that has experienced a sentinel event, the critical access hospital's current accreditation status will be reported in the usual manner without making reference to the sentinel event. If the inquirer specifically references the particular sentinel event, The Joint Commission will acknowledge that it is aware of the event and currently is working or has worked with the critical access hospital through the sentinel event review process.

VIII. The Joint Commission's Response

Joint Commission staff assess the acceptability of the critical access hospital's response to the sentinel event, including the thoroughness and credibility of any comprehensive systematic analysis information reviewed and the critical access hospital's action plan. (Root cause analysis is the most commonly used method of comprehensive systematic

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analysis.) If the comprehensive systematic analysis and action plan are found to be thorough and credible, The Joint Commission will notify the critical access hospital and assign one or more or other mutually agreed-upon documentation of sustained improvement and reduction of risk, such as SE MOS. (See the “Sentinel Event Measures of Success” section below for more details.)

Joint Commission staff will provide consultation to the critical access hospital if the response is unacceptable, and will allow an additional 15 business days beyond the original submission period for the critical access hospital to resubmit its response. If the response is still unacceptable, the critical access hospital’s accreditation decision may be impacted.

IX. Sentinel Event Measures of Success (SE MOS)

The critical access hospital’s follow-up activity may be conducted through the MOS process. An SE MOS is a numerical or quantifiable measure that indicates whether a planned action was effective and sustained. The SE MOS is due on a mutually agreed-upon date.

IF an SE MOS is used, the following information would apply:

- If an SE MOS is submitted on time but does not meet pre-established levels of compliance, Joint Commission staff will request an additional four months of data. If the second set of data does not meet pre-established levels of compliance, the critical access hospital’s accreditation decision may be impacted.
- If submission of an SE MOS is 90 or more days late, the critical access hospital’s accreditation status may be impacted.

X. Handling Sentinel Event–Related Documents

Handling of any submitted comprehensive systematic analysis and action plan is restricted to specially trained staff in accordance with procedures designed to protect the confidentiality of the documents.

At the time the review of the de-identified comprehensive systematic analysis is entered into the Sentinel Events Database, the original documents will be destroyed, as well as any copies. However, upon request the original documents may be returned to the

critical access hospital. The information contained in any electronically submitted comprehensive systematic analysis tool will be de-identified after the review is completed.

The action plan resulting from the analysis of the sentinel event will initially be retained long enough to serve as the basis for appropriate follow-up activities, such as the SE MOS or other mutually agreed-upon documentation of sustained improvement. After the action plan has been implemented and meets the established levels of compliance, The Joint Commission will destroy and delete the action plan. If the SE MOS was submitted electronically, the information will likewise be de-identified upon completion of the review.

XI. Oversight of the Sentinel Event Policy

The Accreditation Committee of the Joint Commission's Board of Commissioners is responsible for approval of this policy and overseeing its implementation. In addition to reviewing and deciding individual cases involving changes in a critical access hospital's accreditation decision, Joint Commission staff will periodically audit the comprehensive systematic analysis and documentation of follow-up activities and present aggregate de-identified data to the Accreditation Committee and the Board of Commissioners. For the purposes of these audits, The Joint Commission temporarily retains random de-identified samples of these documents. Upon completion of the audit, these documents are also destroyed.

For more information about the Joint Commission's Sentinel Event Policy, visit the Joint Commission's website at <http://www.jointcommission.org> or call the Sentinel Event Hotline at 630-792-3700.

XII. Survey Process

When conducting an accreditation survey, The Joint Commission seeks to evaluate the critical access hospital's compliance with the applicable standards, National Patient Safety Goals, and Accreditation Participation Requirements, and to assess the critical access hospital's performance based on those requirements. Surveyors are instructed not to search for or investigate sentinel events during an accreditation survey or to inquire about sentinel events that have been reported to The Joint Commission. However, surveyors may assess a critical access hospital's performance improvement practices, such as its processes for responding to a sentinel event.

If during the course of conducting survey activities, a potential serious patient safety event is newly identified, the surveyor will take the following steps:

- Inform the critical access hospital CEO that the event has been identified
- Inform the CEO the event will be reported to The Joint Commission for further review and follow-up under the provisions of the Sentinel Event Policy

The surveyor makes no determination of whether or not the event is a sentinel event and does not focus on or explore the event further, but rather will hand off further discussion to a patient safety specialist in the Office of Quality and Patient Safety. Surveyors are not authorized to investigate sentinel events. The patient safety specialist will contact the critical access hospital after all survey activity is entirely completed to explore the event and determine whether or not submission of a comprehensive systematic analysis is required. If so, the critical access hospital will proceed with the steps described after an event is determined to be a sentinel event.

During the on-site survey, the surveyor(s) will assess the critical access hospital's compliance with sentinel event–related standards in the following ways:

- Review the critical access hospital's process for responding to a sentinel event
- Interview the critical access hospital's leaders and staff about their expectations and responsibilities for identifying, reporting on, and responding to sentinel events

Appendix. Accreditation Requirements Related to Sentinel Events

The following are standards related to sentinel events and associated elements of performance (EPs):

Standard LD.04.04.05

The critical access hospital has an organizationwide, integrated patient safety program within its performance improvement activities.

Elements of Performance for LD.04.04.05

1. The leaders implement a critical access hospitalwide patient safety program.
2. One or more qualified individuals or an interdisciplinary group manages the safety program.

3. The scope of the safety program includes the full range of safety issues, from potential or no-harm errors (sometimes referred to as near misses, close calls, or good catches) to hazardous conditions and sentinel events.
4. All departments, programs, and services within the critical access hospital participate in the safety program.
5. As part of the safety program, the leaders create procedures for responding to system or process failures.

Note: Responses might include continuing to provide care, treatment, and services to those affected, containing the risk to others, and preserving factual information for subsequent analysis.

6. The leaders provide and encourage the use of systems for blame-free internal reporting of a system or process failure, or the results of a proactive risk assessment.

Note: This EP is intended to minimize staff reluctance to report errors in order to help an organization understand the source and results of system and process failures. The EP does not conflict with holding individuals accountable for their blameworthy errors.

7. The leaders define “patient safety event” and communicate this definition throughout the organization.

Note: At a minimum, the organization’s definition includes those events subject to review in the “Sentinel Events” (SE) chapter of this manual. The definition may include any process variation that does not affect the outcome or result in an adverse event, but for which a recurrence carries significant chance of a serious adverse outcome or result in an adverse event, often referred to as a close call or near miss.

8. The critical access hospital conducts thorough and credible comprehensive systematic analyses (for example, root cause analyses) in response to sentinel events as described in the “Sentinel Events” (SE) chapter of this manual.
9. The leaders make support systems available for staff who have been involved in an adverse or sentinel event.

Note: Support systems recognize that conscientious health care workers who are involved in sentinel events are themselves victims of the event and require support. Support systems provide staff with additional help and support as well as additional resources through the human resources function or an employee assistance program. Support systems also focus on the process rather than blaming the involved individuals.

10. At least every 18 months, the critical access hospital selects one high-risk process and conducts a proactive risk assessment.

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Note: For suggested components, refer to the *Proactive Risk Assessment* section at the beginning of the “Leadership” (LD) chapter.

11. To improve safety and to reduce the risk of medical errors, the critical access hospital analyzes and uses information about system or process failures and the results of proactive risk assessments.
12. The leaders disseminate lessons learned from comprehensive systematic analyses (for example, root cause analyses), system or process failures, and the results of proactive risk assessments to all staff who provide services for the specific situation.
13. At least once a year, the critical access hospital provides governance with written reports on the following:
 - All system or process failures
 - The number and type of sentinel events
 - Whether the patients and the families were informed of the event
 - All actions taken to improve safety, both proactively and in response to actual occurrences
 - **For rehabilitation and psychiatric distinct part units in critical access hospitals:**
The determined number of distinct improvement projects to be conducted annually
14. The leaders encourage external reporting of significant adverse events, including to voluntary reporting programs in addition to mandatory programs.

Note: *Examples of voluntary programs include The Joint Commission Sentinel Event Database and the U.S. Food and Drug Administration (FDA) MedWatch. Mandatory programs are often state initiated.*

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The critical access hospital respects the patient’s right to participate in decisions about his or her care, treatment, and services.

Note: *For rehabilitation and psychiatric distinct part units in critical access hospitals: This right is not to be construed as a mechanism to demand the provision of treatment or services deemed medically unnecessary or inappropriate.*

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21. The critical access hospital informs the patient or surrogate decision-maker about unanticipated outcomes of care, treatment, and services that relate to sentinel events as defined by The Joint Commission. (Refer to the Glossary for a definition of sentinel events.)
22. The licensed independent practitioner responsible for managing the patient's care, treatment, and services, or his or her designee, informs the patient about unanticipated outcomes of care, treatment, and services related to sentinel events when the patient is not already aware of the occurrence or when further discussion is needed.

Note: *In settings where there is no licensed independent practitioner, the staff member responsible for managing the care of the patient is responsible for sharing information about such outcomes.*

