



Allegheny County  
Department of  
Human Services

# **Updated Behavioral Health Critical Incidents Reporting Process**

**June 2024**



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# Notices

- The process **ONLY** applies to Allegheny County Department of Human Services (ACDHS) Office of Behavioral Health (OBH)-contracted:
  - Adult and Child Mental Health (MH) Service Providers
  - Early Intervention (EI) Service Providers
  - Drug and Alcohol (D&A) Service Providers
- **The updated process is live July 1, 2024.**

# Definition

A **critical incident (CI)**, also called an unusual incident, sentinel event, or adverse event, is an unexpected and undesirable event that has an adverse impact on a consumer's health or safety.

# Updated Process: Goals

Transform Allegheny County Department of Human Services Office of Behavioral Health critical incident filing, warehousing, and reporting to support service and system monitoring and improvement by:

- Alleviating administrative burdens around data entry and submission through a new online entry form.
- Facilitating seamless information sharing and collaboration on investigations by routing incidents automatically to appropriate staff and improving internal record systems.
- Integrating incident data into one, centralized system, allowing for better reporting and monitoring.

# Updated Process: Summary of Changes

## **1. Reporting Methods:**

- a. Added the new method for reporting: online form on a public web portal.
- b. Removed fax and email options.

## **2. Reporting Requirements:**

- a. Retained the phone call process for D&A Providers for the initial notice.
- b. Removed the requirement to verbally call IRES to notify OBH of incidents involving a death or emergency services.
- c. Contracted providers are STILL required to report ALL reportable incidents to OBH via the new online form within 24 hours, as well as to any other applicable entities using their processes (e.g., PA DHS, PA DDAP, CCBH).

# Updated Process: Summary of Changes

3. **Incident Categories:** Updated incident categories and definitions to align with internal needs and state and CCBH's language where possible.
4. **Database Infrastructure and Flow:**
  - a. Updated so data securely, directly, and automatically goes into a centralized, secure data system and notifies appropriate staff for follow-up.
  - b. Updated internal incident records system to support follow-up activities and documentation.

# Updated Process: Walkthrough

- **Reporting Period:**

- Within **24 hours** of the incident OR learning about the incident.

- **Reporting Methods:**

- Online form: <https://dw.alleghenycounty.us/forms/bhci/incident/>
- Phone (initial notice only, [D&A Providers only](#))
  - Bureau of Drug and Alcohol: 412-350-2755



# Updated Process: Walkthrough

- **Reportable Incident Categories:** Any incident involving an ACDHS OBH contracted provider's employees or contracted staff, subcontractors, and/or clients who received a behavioral health service within 6 months of the incident, in which there was a/an:

1. Any event requiring emergency services of the fire department or a law enforcement agency
2. Abuse/[assault](#)
3. Death
4. Illness of an individual ([while at a provider site, requiring medical attention](#))
5. Injury of an individual ([while at a provider site, requiring medical attention](#))
6. Missing person
7. Neglect
8. Non-fatal overdose
9. [Non-fatal](#) suicide attempt
10. Restraint (requiring medical attention)
11. Seclusion
12. Significant medication error ([requiring medical attention](#))
13. Other

# Updated Process: Walkthrough

- **Follow-Up:**
  - **Notification, assignment, and review by the appropriate OBH Team**
  - **Interventions**
    - Request additional information.
    - Request records and/or conduct on-site visit to:
      - Review consumer records, policies and procedures, and/or other relevant documentation
      - Complete a site tour
      - Interview staff and/or clients
    - Request action to address quality of care and/or safety concerns.

# **Form Walkthrough**

# **Incident Categories**

# Any Event Requiring Emergency Services of the Fire Department or a Law Enforcement Agency

## **Definition**

Any event of this nature, including:

- Act of Violence
- Criminal Charge/Arrest
- Fire
- Flood
- Misappropriation of Individual Property (i.e., theft, embezzlement, or other unauthorized use of another's property)
- Police Called without a Charge or Arrest
- Victim of a Crime
- Vandalism

## **Non-Reportable Events**

- Non-emergency services of the fire department or law enforcement agency.
- Police presence related to commitment procedures or rescue squad activities.
- Testing of alarm systems/false alarms, or 911 calls by individuals that are unrelated to criminal activity or emergencies.
- Presence of law enforcement personnel during any activity governed by the Mental Health Procedures Act.

# Abuse/Assault

## Definition

Occurrence of the infliction of injury, unreasonable confinement, intimidation, punishment, mental anguish, or sexual abuse. For the purposes of reporting, abuse includes abuse or assault of individuals by staff or abuse or assault of individuals by others. Depending on the nature of the abuse or assault, it may also constitute a crime reportable to police. Allegations of abuse or assault are also to be reported. This includes the following:

- **Physical Abuse/Assault** – Intentional physical acts by staff or other person which causes or may cause physical injury to an individual;
- **Psychological Abuse** – Acts including verbalizations, which may emotionally harm, invoke fear or humiliate, intimidate, degrade or demean an individual;
- **Sexual Abuse/Assault** – Acts or attempted acts such as rape, sexual molestation, sexual harassment and inappropriate or unwanted touching of a sexual nature of an individual by another person. Any sexual contact between a staff person and an individual is abuse;
- **Exploitation** – The practice by a caregiver or other person of taking unfair advantage of an individual for the purpose of personal gain, including actions taken without informed consent or with consent obtained by misrepresentation, coercion or threats of force. This could include inappropriate access to or the use of an individual's finances, property and personal services;

## Non-Reportable Events

- Altercations among individuals that may result in physical contact but do not cause serious injury and which do not reflect a pattern of physical intimidation or coercion of a individual.
- Discord, arguments, or emotional distress resulting from normal activities and disagreements that can be found in typical congregate living situations.

# Death

## **Definition**

All deaths regardless of cause/manner or perpetrator. Please identify the cause of death if known.

- Accident
- Natural/Medical
- Overdose
- Suicide
- Homicide
- Other

## **Non-Reportable Events**

- N/A

# **Illness of An Individual (While at Provider Site Requiring Medical Attention)**

## **Definition**

Any life-threatening illness, any involuntary emergency psychiatric admission, or any illness that appears on the Department of Health's List of Reportable Diseases (under 28 PA Code Chapter 27 relating to communicable and non-communicable diseases), including those appearing on the DOH list as the subject of voluntary reporting by the Center for Disease Control and Prevention (reports are only needed when the diagnosis is initially made). It should be noted whether the injury required:

- Inpatient Services
- Outpatient Services

## **Non-Reportable Events**

- Scheduled treatment of medical conditions, on an outpatient or inpatient basis.
- Any voluntary inpatient admission to a psychiatric facility or service at a crisis facility or psychiatric department of acute care hospitals for the purpose for evaluation and/or treatment.
- Emergency room visit or inpatient admission that result from an individual's previously diagnosed chronic illness, where such episodes are part of the normal course of the illness.
- Emergency room visit where the visit is necessitated because of the unavailability of the individual's primary care physician.



# **Injury of An Individual (While at Provider Site Requiring Medical Attention)**

## **Definition**

When an individual requires medical treatment more intensive than first aid for an injury that occurred while the member was on the provider's property. First aid includes assessing a condition, cleaning a wound, applying topical medications, and applying simple bandages. It should be noted whether the injury required:

- Inpatient Services
- Outpatient Services

## **Non-Reportable Events**

- Minor injury handled on-site by first aid (e.g., minor cuts, scrapes, scratches, blisters, or burns; conditions such as headaches or stomachaches).
- Scheduled treatment of medical conditions, on an outpatient or inpatient basis.

# Missing Person

## Definition

Any individual who is out of contact with staff without prior arrangement for more than 24 hours. A person may be considered in “immediate jeopardy” based on his/her personal history and may be considered missing before 24 hours elapse. It is considered a reportable incident whenever police are contacted about a missing person or the police independently find and return an individual, regardless of the amount of time missing.

- **Elopement from Facility or Facility-Supervised Activity** - A child, adolescent, or adult who leaves or is absent from an inpatient, residential, or school facility premises or the premises of a facility supervised activity (e.g., outing off facility premises that is directly supervised or managed by staff, such as an outing to a restaurant, store, or park with staff) without approval of staff.
- **Elopement while on Non-Facility-Supervised Therapeutic Leave/Pass/Outing** - A child, adolescent, or adult who is absent from an inpatient, residential, or school facility-approved therapeutic leave, pass, or outing that is NOT directly supervised or managed by staff (e.g., home pass with family from an inpatient or residential setting).
- **Other Reportable Missing Person** - A child, adolescent, or adult who is out of contact with staff without prior arrangement or who may be in “immediate jeopardy” based on their personal history. This category is relevant to all services. OR Any time law enforcement is contacted about a missing person or law enforcement independently find and return the child, adolescent, or adult regardless of the time he or she was missing. This category is relevant to all services.

## Non-Reportable Events

- An individual is on an approved therapeutic leave/pass/outing from a residential or inpatient setting, facility/staff-supervised or not.
- An individual did not show for or did not make themselves available for their scheduled appointment.

# Neglect

## **Definition**

The failure to obtain or provide needed services and supports defined as necessary or otherwise required by law, contract or regulation. This can include the failure to provide for needed care such as shelter, food, clothing, personal hygiene, medical care and protection from health and safety hazards.

## **Non-Reportable Events**

- N/A

# **Non-Fatal Overdose**

## **Definition**

The occurrence of an individual taking too much of a drug, alcohol, or medication leading to life-threatening overdose or poisoning which requires medical treatment and/or where the individual suffers or could have suffered significant injury or death.

## **Non-Reportable Events**

- N/A

# **Non-Fatal Suicide Attempt**

## **Definition**

The intentional and voluntary attempt to take one's own life. A suicide attempt is limited to the actual occurrence of an attempt which requires medical treatment and/or where the individual suffers or could have suffered significant injury or death.

## **Non-Reportable Events**

- Threats of suicide, including suicidal ideation, which do not result in an actual attempt.
- Gestures, which clearly do not place the individual at risk for serious injury, death or require any medical attention.
- Actions, which may place the individual at risk but where the individual is not attempting harm to himself/herself.

# Restraint (Requiring Medical Attention)

## Definition

- **Restraint** is any chemical, mechanical, or manual technique used for the purpose of restricting movement.
  - A **chemical restraint** (federal term: "drug used as a restraint") is a medication used to control acute, episodic behavior that is not the standard treatment for the individual's medical or psychiatric condition, and is intended to significantly lower the individual's level of consciousness and restricts the movement of an individual.
  - A **mechanical restraint** is a device used to control acute, episodic behavior that restricts movement or function of an individual or portion of an individual's body. Examples of mechanical restraints are handcuffs that are locked around the wrists, elbow restraints, foot restraints, cloth harnesses applied to any portion of the body, and blanket wraps.
  - A **manual restraint** is a physical hands-on technique that restricts the movement or function of the individual's body or portion of the individual's body.

## Non-Reportable Events

- A medication ordered by a physician as part of the ongoing individualized treatment plan for treating the symptoms of mental, emotional, or behavioral disorders is not a chemical restraint.
- Mechanical restraints do not include measures to promote body positioning to protect the individual and others from injury, or to prevent the worsening of a physical condition. Devices also used for medical treatment such as helmets for prevention of injury during seizure activity, mitts, and muffs to prevent self-injury are not considered restraints.
- Prompting, escorting or guiding an individual who does not resist to assist in the activities of daily living is not a manual restraint.

# Seclusion

## Definition

Any use of seclusion or restraint as defined by MH Bulletin, “OMHSAS 02-01, The Use of Seclusion and Restraint in MH Facilities and Programs”:

- **Seclusion** is restricting a child, adolescent, or adult in a locked room, and isolating the individual from any personal contact. The term "locked room" includes any type of door locking device such as a key lock, spring lock, bolt lock, foot pressure lock or physically holding the door closed, preventing the individual from leaving the room. Locking an individual in a bedroom during sleeping hours is considered seclusion.

## Non-Reportable Events

- Seclusion does not include the use of a time-out room.

# **Significant Medication Error** **(Requiring Medical Attention)**

## **Definition**

A missed medication, incorrect medication, or incorrect dosage where a member suffers an adverse consequence that is either short or long term in duration and/or receives treatment to offset the effects of the error.

## **Non-Reportable Events**

- Refusal by the individual to take prescribed medication.



# Other

## **Definition**

Any other incident of a serious nature not detailed in the other incident types.

## **Non-Reportable Events**

- N/A

# Important Information

- **Online Form:** <https://dw.alleghenycounty.us/forms/bhci/incident/>
- **Phone** (initial notice only, D&A Providers only):
  - Bureau of Drug and Alcohol: 412-350-2755
- **Questions:**
  - Review the Category Descriptions and Question and Answer Documents
  - Call:
    - Bureau of Drug and Alcohol Services: 412-350-2755
    - Bureau of Mental Health Services: 412-707-4007