



Quality Management Program

The Quality Management Program at CBH operates in coordination with the other arms of the Department of Behavioral Health (DBH). DBH/CBH defines, evaluates and reviews all aspects of the delivery of behavioral health services to each individual covered under HealthChoices for Philadelphia County. The goal of DBH/CBH is to insure that appropriate treatment options are provided to clients in a culturally sensitive, quality-driven and supportive environment.

The Quality Review unit functions within the Provider Operations Department so that all aspects of the contracted agency operations are linked to a continuous quality improvement process. The Quality Review unit provides educational outreach to participating providers, and works to assure that participating providers, specialized practitioners and clients are informed about all quality of care and quality of service standards. DBH/CBH requires that providers develop internal quality improvement processes that enhance and support the quality of care delivered. The Quality Review unit works closely with other DBH/CBH departments to monitor the service delivery of providers.

In addition, it is the responsibility of the Quality Review unit to:

- ▶ establish objective and measurable criteria to assess client care
- ▶ establish a system which identifies potential risk and adverse outcome to clients or providers and identify opportunities for improvement
- ▶ participate in provider monitoring and auditing activities to determine compliance with established quality of care and quality of service standards
- ▶ identify and define problems in the delivery of quality care revealed through data collection and analysis
- ▶ assess occurrences with adverse outcomes through the peer review process
- ▶ serve as an advocate for the early detection and treatment of mental illness and substance abuse
- ▶ annually review through the re-credentialing process, the provider's quality improvement efforts to determine the program's effectiveness in achieving the attainment of stated goals regarding the clinical care received by DBH/CBH clients

Provider's Role in the Quality Management Process

DBH/CBH recognizes the importance of collaborating with providers to improve the quality of behavioral health services. The process of delegation of certain quality improvement activities, such as the development and implementation of on-site policies and procedures, is designed to empower the provider to identify necessary improvements to the delivery of care to clients receiving services. Through the work of the Clinical Systems Analysts, DBH/CBH will serve as an advising body to assist providers during the initial development of their own individualized quality assurance program. Once the provider is credentialed, DBH/CBH also serves as a liaison among providers, clients and governing agencies to assess and monitor the progress and ongoing effectiveness of their program.

As part of DBH/CBH's Quality Management Plan, providers are expected to actively participate in activities including, but not limited to:

- ▶ cooperating with focus group studies, work with the Consumer Satisfaction Team and Member Services to resolve quality-of-care issues
- ▶ providing client data for statewide External Quality Review process on a yearly basis
- ▶ responding to client satisfaction surveys
- ▶ reporting significant incidents
- ▶ participating in the resolution of client complaints and grievances
- ▶ submitting aggregate data or documents
- ▶ helping maintain open lines of communication to ensure timely resolution of identified concerns

Further, providers are expected to provide DBH/CBH with copies of records, policies, procedures, state licensing reviews, accreditation surveys, other audits and all documentation as is necessary for DBH/CBH to investigate specific quality concerns. The provider is responsible for the cost of copies, postage, courier or fax services and is expected to provide them to DBH/CBH in a timely fashion.

Clinical Records—Access and Retention

Providers will retain and maintain records for clients in a current, detailed, organized and comprehensive manner in accordance with applicable state regulations and customary professional practice that permits effective quality review.

All records relevant to DBH/CBH clients will be retained by the provider for five years after the final payment is made. All records will be available to DBH/CBH for audit purposes as may be necessary for quality management, compliance and clinical review.

Providers will be responsible for obtaining authorization to release clinical records from each client to DBH/CBH before delivering services. DBH/CBH has the right to inspect medical records, books, billing and financial information maintained by the provider pertaining to the City of Philadelphia, DBH/CBH-covered services and DBH/CBH clients. Costs of copying or transmitting information will be the provider's responsibility.

Documentation and Reporting of Significant Incidents

Philadelphia's Department of Behavioral Health (DBH) has instituted a centralized process for reporting all Significant Incidents. CBH serves as a clearinghouse for this process.

The policy applies whenever a provider reports a significant incident involving adult and child DBH clients of mental health and drug and alcohol services—whether they are:

- ▶ CBH clients receiving in-plan services, or
- ▶ county-funded individuals receiving supplemental funding through the OMH/MR, or CODAAP, including those served by the Behavioral Health Special Initiative (BHSI).

DEFINITION

Significant Incident: Care or treatment that is not routine, and/or is inconsistent with standards of practice, and/or has resulted in injury or potential harm to a DBH/CBH client.

REPORTABLE INCIDENTS

- ▶ death
- ▶ homicide committed by a client who is in service or has been discharged within 30 days
- ▶ suicide attempt requiring medical intervention or hospitalization
- ▶ act of violence, with injury requiring emergency treatment, by or to a consumer/client (MH only if by a consumer)
- ▶ alleged or suspected abuse (physical, sexual, financial) of or by a consumer/client (MH only)
- ▶ adverse reaction to medication administered by a provider that requires medical attention (MH only)
- ▶ neglect which results in serious injury or hospital treatment (MH only)
- ▶ missing person: child who has not returned to home or facility within 8 hours, or at-risk adult who has not returned home within 24 hours
- ▶ arrest (excludes involuntary commitments – 302s)
- ▶ fire or serious property damage at a site where behavioral health services are delivered
- ▶ infectious disease outbreak at a provider site
- ▶ all non-routine discharges from inpatient, residential rehabilitation (D&A), children's residential, detoxification, or methadone maintenance settings, i.e., administrative/involuntary discharges or leaving a facility against medical or facility advice (AMA, AFA)

REPORTING PROCESS

- 1 A copy of all reportable incidents must be faxed to Quality Review at (215) 413-7132 on the attached **Significant Incident Report** form **within 24 hours** of occurrence. This action usually **precedes** an investigation.
- 2 When an internal investigation is warranted, a copy of the investigative report should be **received within 30 days** of the incident. Investigative Reports may be faxed to Quality Review at (215) 413-7132 or mailed to: Quality Review, Community Behavioral Health, 801 Market Street, 7th Floor, Philadelphia, PA 19107.
- 3 Incidents involving physical abuse, sexual abuse, and/or neglect of children must be reported to the State. Providers are mandated by the State to report incidents directly by calling the Commonwealth's CHILdline at (800) 932-0313.
- 4 A missing person who is at-risk should be reported to the Mental Health Delegates by faxing a Missing Person Report Form to (215) 732-2508. The form will be forwarded to all the Crisis Response Centers, so that they can inform you if the missing person presents at one of the crisis centers. The Mental Health Delegates' phone number is (215) 685-6440.

WHERE TO SEND SIGNIFICANT INCIDENT REPORTS:

All reportable incidents must be faxed to Quality Review:

Fax: (215) 413-7132

Investigative reports may be faxed or mailed to Quality Review:

Fax: (215) 413-7132

Mail: Quality Review
Community Behavioral Health
801 Market Street, 7th Floor
Philadelphia, PA 19107

Incidents involving children must be reported to the Commonwealth's CHILdline:

CHILdline phone number: (800) 932-0313

Report an at-risk missing person to the Mental Health Delegates:

Fax Missing Person Report Form to: (215) 732-2508

Mental Health Delegates phone number: (215) 685-6440

OBTAINING ASSISTANCE

If you have any questions about reporting incidents, please contact:

Quality Review: (215) 413-7660

Confidentiality and Release of Information

Confidentiality Policy: Providers will protect the confidentiality of all information in its records from unauthorized disclosure at all stages of collection, use, storage, release of information and destruction. Each provider has the responsibility for safe-guarding the confidentiality of client information. This responsibility is crucial because persons seeking and receiving services offered through DBH providers are entitled to do so with respect and confidentiality by DBH and its contract providers.

This policy applies to all client information and to all client records within the DBH network. A record includes all written clinical information, observations, reports or fiscal documents relating to a prospective, present or past client, when the creation or retention of those documents is either required or authorized as part of operations. It includes central records, individual client records and reports that may be created. This policy does not apply to documents that were public before the provider received them, even if the documents now happen to be in the client's file.

(55 PA Code § 5100.32(h))

A full review of regulations governing this policy explicitly covers all information contained in provider records, including but not limited to the following:

- ▶ information identifying the client, their homes or workplaces or any other personal information
- ▶ medical treatment information
- ▶ mental health treatment information
- ▶ substance abuse treatment information
- ▶ information regarding contraceptives or abortion services that clients have received, including minors who have received such services without parental knowledge or consent
- ▶ information received from county children and youth agencies
- ▶ sexually transmitted disease test results or treatment information
- ▶ HIV test information

Providers receiving a request for information, or needing to release such information for any purposes, may consult this policy. The specific rules that apply to each piece of information are spelled out in detail in the DBH/CBH Delegated Credentialing Manual.