




## Policy and Procedures

<b><u>DEPARTMENT NAME: Quality Management</u></b>		
<b><u>SUBJECT: Incident Review Committee</u></b>	<b><u>POLICY NUMBER: QM-049</u></b>	
<b><u>APPROVAL:</u></b>  	<b><u>EFFECTIVE DATE:</u></b>  2/3/2021	<b><u>REPLACES : QM-048 dated 1/6/21</u></b>

**I. PURPOSE:** The purpose of the Children’s Network of Southwest Florida’s (Network) Incident Review Committee (IRC) is to assure that all reportable incidents, incidents reported to the Network pursuant to the Network’s Incident Reporting Procedure (QM-043) and Child Death (CFOP 175-17), are reviewed and monitored, that all reportable incidents that may adversely affect the care and safety of clients their families and the Network’s employees are appropriately addressed, and that preventive and corrective measures are identified, as appropriate. The composition of the Network Incident Review Committee must be such that a free and open exchange of information is ensured, in order to facilitate full and complete investigations.

**II. REVIEW HISTORY:** New policy established 6/24/19 and updated 1/6/21.

**III. CONTACT:** Quality Management Director

**IV. PERSONS AFFECTED:** Children’s Network of SW Florida and any of its contracted Case Management Organizations within Circuit 20 who deliver services to children and young adults in Extended Foster Care, Postsecondary Education Services and Supports, and Aftercare programs.

**V. POLICY:** This policy provides a mechanism to review and monitor reportable incidents to ensure the safety of children and families receiving services.

**VI. CROSS REFERENCES:** QM-043 Incident Reporting and CFOP 175-17 Child Death Reviews

**VII. PROCEDURES:**

**A.** An IRC shall review reportable incidents and notable occurrences to:

1. Ascertain that reportable incidents and notable occurrences were reported, managed, investigated, and documented consistent with the provisions of this part and with agency policies and procedures and to make written recommendations to the appropriate staff and/or the CEO, or designee to correct, improve or eliminate inconsistencies;

**Children's Network of Southwest Florida  
QM-049 Incident Review Committee**

2. Ascertain that necessary and appropriate corrective, preventive, remedial, and/or disciplinary action has been taken to protect persons receiving services from further harm, to safeguard against the recurrence of similar reportable incidents and notable occurrences, and to make written recommendations to the CEO, or designee to correct, improve, or eliminate inconsistencies;
3. Ascertain if further investigation or if additional corrective, preventive, remedial, and/or disciplinary action is necessary, and if so, to make appropriate written recommendations to the CEO relative to the reportable incident or notable occurrences;
4. Identify trends in reportable incidents and notable occurrences (e.g., by type, person, site, employee involvement, time, date, circumstances, etc.), and to recommend appropriate corrective, preventive, remedial, and/or disciplinary action to the CEO to safeguard against such recurring situations or reportable incidents and notable occurrences; and
5. Ascertain and ensure the adequacy of the agency's reporting and review practices, including the monitoring of the implementation of approved recommendations for corrective, preventive, and remedial action.

**B. An IRC shall:**

1. Meet initially once a month, but no less frequently than on a quarterly basis or sooner should the circumstances so warrant.
2. Review all minor notable occurrences that are reported, which may be done by a sub-committee of the IRC or by individual assignment to members of the IRC, and maintain a record of such incident/occurrence review, recommendations, and/or actions taken in such a manner as to provide for tracking and trending;
3. Review and monitor minor notable occurrences, serious notable occurrences and reportable incidents;
4. Review and monitor investigatory procedures, but shall not perform the routine investigation of reportable incidents or notable occurrences;
5. Make written recommendations to eliminate or minimize similar reportable incidents and/or notable occurrences in the future, and/or to improve investigatory or other procedures;
6. Make written recommendations to the CEO on changes in agency policy or procedures to improve conditions contributing to the reportable incidents and/or notable occurrences reviewed;

**Children's Network of Southwest Florida  
QM-049 Incident Review Committee**

7. Forward findings and recommendations to the chief executive officer at least quarterly.

8. Provide documentation that all reports of reportable incidents and serious notable occurrences have been reviewed by the committee and that results and recommendations have been conveyed to appropriate agency executives and others with a need to know;

9. Monitor actions taken on any and all recommendations made and advise the CEO, or designee when there is a problem;

10. In accordance with agency policy, report periodically, but at least annually, to the CEO, Case Management Organization leadership, and appropriate provider agency executive; general identified trends in reportable incidents and notable occurrences; and corrective, preventive, remedial and/or disciplinary action pertaining to identified trends; and

**C. Organization and Membership of the IRC:**

1. An IRC is established to meet the organizational needs of the Children's Network of Southwest Florida to assure that all reportable incidents, incidents reported to the Network pursuant to the Network's Incident Reporting Procedure (QM-043) and Child Death (CFOP 175-17), are reviewed and monitored, that all reportable incidents that may adversely affect the care and safety of clients their families and the Network's employees are appropriately addressed, and that preventive and corrective measures are identified, as appropriate. The composition of the Network Incident Review Committee must be such that a free and open exchange of information is ensured, in order to facilitate full and complete investigations.

2. Committee members and alternates shall be nominated by Department Director and appointed by the chief executive officer or designee.

3. Whenever possible Committee members should have been employed by the Children's Network for more than eighteen months.

4. Committee members serve for 2 years from time of appointment.

5. Membership of an IRC shall include at least one staff member representing agency department:

a. Quality Management (Serves as Chairperson);

b. Contracts/Utilization Management;

**Children's Network of Southwest Florida  
QM-049 Incident Review Committee**

- c.** Human Resources;
- d.** Staff Development;
- e.** Information Systems;
- f.** Programs (Licensing/Adoptions)

**6.** In the event that a Department is unable to obtain the members required by subparagraphs B.5.a.- f. of this subdivision, the agency shall document its periodic efforts to obtain the specified members.

**7.** Membership limitations.

- a.** The chief executive officer of the agency shall not serve as a member of the committee, but may be consulted by the committee in its deliberations.
- b.** Department Directors shall not serve as a member of the committee, but may be consulted by the committee in its deliberations.

**8.** Case-specific requirements.

- a.** There may be representation by invitation by someone from or with knowledge of the agency's own organizational entity where the event under discussion occurred, or by someone who is familiar with the person(s) involved.
- b.** Restrictions on review of specific incidents or allegations of abuse.
  - 1)** Any committee member who recognizes a potential conflict of interest in his or her assignment shall report this information to the committee and recuse him or herself from participating in committee review of the incident or occurrence in question.
  - 2)** No committee member may participate in the review of any reportable incident or notable occurrence in which he or she was directly involved, in which his or her testimony is incorporated, in which his or her spouse, domestic partner, or other immediate family member was directly involved, or which he or she investigated or participated in the investigation.
  - 3)** For reportable incidents and serious notable occurrences, no committee member may participate in the review of an investigation in which his or her spouse, domestic partner, or immediate family member provides supervision to the program where the incident took place or supervised directly involved parties.



**Children's Network of Southwest Florida  
QM-049 Incident Review Committee**

4) No committee member may participate in the review of a reportable incident or serious notable occurrence, if such committee member is the immediate supervisor of staff directly involved in the event or situation. Such member may, however, participate in committee deliberation regarding appropriate corrective, preventive or remedial action.

9. Members of the committee shall be trained in confidentiality laws and regulations, and shall comply with HIPPA.

D. Minutes – The chairperson of an incident review committee shall ensure that minutes are kept for all meetings.

E. Meeting Frequency – The Children's Network IRC will meet initially once a month, but no less frequently than on a quarterly basis.

F. Meeting Agenda

1. Review and correction of minutes
2. Review of action Items from last meeting
3. Review and discussion of prior months Incident Reports
4. Identify suggested initiatives identified in most recent Reports
5. Assignment of tasks related to initiatives
6. Adjournment

G. Committee Members Duties.

1. Chairperson
  - a. The Chairperson prepares the Agenda for the meeting.
  - b. The Chairperson assures meeting process and boundaries of discussion.
  - c. Completes Semi-Annual Reports to the CEO.

**Children's Network of Southwest Florida  
QM-049 Incident Review Committee**

2. Committee Members
  - a. Regular Attendance or assignment of alternate.
  - b. Review Data prior to meeting.
3. IRC Committee Support Staff
  - a. QM Specialist
    - 1) Completes Incident Report Summary
    - 2) Assists committee in understanding Report elements and Requirements (CFOP).
  - b. Administrative Assistant
    - 1) Maintains minutes of meetings.
    - 2) Schedules facilities for meetings.
    - 3) Distributes invitations to meetings.