


COMMUNITY MENTAL HEALTH OF OTTAWA COUNTY  
**LEADERSHIP**

CHAPTER: 7	SECTION: 2	SUBJECT: <b>LEADERSHIP</b>
TITLE: <b>RISK MANAGEMENT</b>		
EFFECTIVE DATE: <b>12/15/95</b>	REVISED DATE: <b>09/07/99, 02/11/03, 08/07/07, 9/18/13, 6/7/16, 5/1/17, 6/22/18, 7/3/19, 09/16/20, 10/01/21, 10/31/22, 11/14/23</b>	
ISSUED AND APPROVED BY:  EXECUTIVE DIRECTOR		

**I. PURPOSE:**

To establish policy and procedures to manage risk for Community Mental Health of Ottawa County (CMHOC).

**II. APPLICATION:**

To all CMHOC operated and contracted programs as specified by contract.

**III. DEFINITIONS:**

**Risk management** is both accident prevention and protection against accidental loss. Accident prevention differs from protection against loss. Accident prevention precedes the loss; protection comes into play after the loss. Prevention involves people; protection involves devices.

**IV. POLICY:**

It is the policy of CMHOC to minimize risks to staff, visitors, and consumers by preventing accidents and protecting against loss.

**V. PROCEDURE:**

- A. The Agency has a Health & Safety Coordinator who is responsible for the safety programs of the Agency.
- B. The Leadership Group oversees the Quality Improvement program (and committees) which are developed to ensure the safety of the staff and visitors.
- C. Reports and performance indicator data will be presented to the Leadership Group as needed. Recommendations will be made and acted on to prevent accidents and protect against material and/or financial loss.
- D. The Health & Safety Coordinator will maintain a comprehensive plan to monitor the condition of the physical environment in which care is provided to ensure they are as safe as practicable. Identified safety concerns will be addressed by the Health & Safety Coordinator or his/her designee.
- E. Risk Management includes a close scrutiny of the people hired by CMHOC or employed under contract to provide services. All hiring agents are required to thoroughly investigate references and complete criminal background checks before positions are offered. All professional staff must provide the Agency with verifiable credentials prior to starting employment. Further, they are required to provide documentation of compliance with licensing and regulating Agencies. CMHOC and/or the County of Ottawa will validate the education and/or license

- directly from the source to assure documents have not been falsified. Contractual agencies will be required to investigate references, conduct criminal background checks before contingent employment offer and validate the education and/or license directly from the source to assure documents have not been falsified for any professional billing for services. Any professional billing for services will have their credentials checked directly from the source by CMHOC.
- F. The key elements in the CMHOC's Risk Management Program are as follows:
1. Safety Awareness Program
    - a) All staff will read the Safety & Infection Control Policies at the time of hire.
    - b) Periodic safety announcements are distributed to all staff.
    - c) Periodic drills on safety procedures occur at all shifts.
  2. An Infection Control Program
    - a) All staff will read the Safety & Infection Control Policies at the date of hire.
    - b) Issues of Infection control are reviewed by the Infection Control Coordinator.
    - c) All reports of suspected or confirmed infectious disease or elements are immediately reported to the Health & Safety Coordinator.
  3. Adequate Insurance Program through Ottawa County
    - a) Adequate insurance for risk will be maintained.
  4. Monitoring Mechanisms
    - a) Health & Safety Coordinator
      - i. The CEO appoints a site Health & Safety Coordinator who in turn appoints site Building Designees.
      - ii. The site Building Designees will ensure no less than quarterly inspections of all facilities to ensure compliance with Agency safety standards.
      - iii. The Health & Safety Coordinator reports to Leadership Group any recommendations for corrective action and/or improvement.
      - iv. The Health & Safety Coordinator will ensure that necessary safety drills occur (in connection with Ottawa County Emergency Services Department where applicable).
      - v. The Health & Safety Coordinator provides follow up reports to the Leadership Group.
      - vi. Health and Safety will review all safety issues at contracted providers as identified by LRE site review team and follow up with providers as needed.
  5. Preventive Action to Minimize Risk
    - a) Hiring Procedures:
      - i. Hiring agents are required to thoroughly investigate past employment history, criminal background, and references prior to offering a position.

ii. Perspective employees of Community Mental Health of Ottawa County will go through the Ottawa County Human Resources' orientation.

iii. Contractual agencies are required to thoroughly investigate past employment history, criminal background, and references prior to offering a position.

b) Safety Violation:

Staff is encouraged to report safety violations to their building designee, their supervisor and/or the Health & Safety Coordinator.

c) Risk Management Plan

The Risk Management Plan will be updated periodically.

**VI. ATTACHMENT:**

Non-Applicable

**VII. REFERENCE:**

CMHOC Policies & Procedures and CARF