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Disclaimer - This document is for educational purposes only and is not intended as a template for a risk management plan. This sample provides suggestions for an organization to consider when developing their own risk management plan pursuant to 12VAC35-105-520.B. *The italicized language is provided as an example.*

Licensed providers should refer to the regulations and the [Guidance for Risk Management](#) when developing a risk management plan as well as other resources on the DBHDS webpage.

The regulatory requirements and Guidance are noted below in bold. The “tips” in the highlighted sections are best practices for consideration when developing a risk management plan.

12VAC35-105-20 – “Risk management means an integrated system-wide program to ensure the safety of individuals, employees, visitors and others through identification, mitigation, early detection, monitoring, evaluation and control of risks.”

Risk management plans are based on assessed risks, potential risks, and include the strategies and efforts needed to mitigate those risks. Each organization’s risks vary depending on the provider’s size, population served, and unique risks associated with the provider’s business model. The risk management plan may be a standalone plan or it may be integrated into the provider’s quality improvement plan. The risk management plan may apply to just one of the provider’s services or the entire provider organization. If the risk management plan applies to the entire provider organization, the plan should clearly identify each of the licensed services the plan applies to and how it applies to each service.

SAMPLE Risk Management Plan

Office of Licensing [Guidance for Risk Management](#) states “the provider should review and update the plan at least annually or any time the provider identifies a need to review and update the plan based on ongoing quality review and risk management activities.”

Tip – Best practice is to include the date and applicable signatures at the top or bottom of the document. Revisions could also be noted and dated in this section.

Example - Date _____ *Signature* _____ *Title of Person* _____

Review/Revision date: _____

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Tip - Best practice is to include an introduction regarding the purpose of the risk management plan and how it is tied to the organization's mission and vision.

Example - Introduction

The provider's risk management plan supports the organization's mission and vision. The risk management plan seeks to continuously improve safety and minimize or prevent errors and events that result in harm through proactive risk management activities.

Acknowledging that safety is everyone's responsibility, the organization strives to ensure the safety of individuals, employees, visitors, and others through the identification, mitigation, early detection, monitoring, evaluation, and control of risks.

This section could also reference other policies, procedures, protocols or plans that represent the organization's quality and risk management programs.

Tip – Best practice is to include a section regarding leadership's role in the organization's risk management program. Leadership's commitment to a culture of safety and the importance of identifying and addressing risks could be outlined. Leadership has the responsibility for ensuring adequate resources are available for risk management activities.

Example - Leadership

The leadership of the organization is committed to promoting safety and has the overall responsibility for the effectiveness of the risk management program including managing adverse events occurring with individuals served, staff, visitors, and organizational assets.

Leadership supports a non-punitive culture that promotes awareness and empowers staff to identify risk-related issues.

Based on the organization's size and structure, this section could then outline designated committees that are charged with monitoring risks and reviewing the impact of risk reduction strategies.

Tip – Best practice is to include a section outlining the roles and responsibilities related to risk management.

Example – Role and Responsibilities of the person designated for the risk management function

Working with leadership, the risk manager is responsible for creating, implementing, and evaluating the outcomes of the risk management plan. (Note – the job description of the staff member responsible for risk management shall also include this information)

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Based on the organization's size and structure, this section could describe how the risk manager coordinates with infection control, quality improvement, patient safety, and environment of care management. The section could also outline how all employees are responsible for reporting serious incidents, safety concerns, and medication errors.

12VAC35-105-520.B - The provider shall implement a written plan to identify, monitor, reduce, and minimize harms and risk of harm, including personal injury, infectious disease, property damage or loss, and other sources of potential liability.

I. Identification Example:

The organization will identify risks through:

- Serious incident reporting
- Infectious disease reporting
- Safety inspections (hazardous chemicals, unsafe conditions, equipment, smoke detector/fire extinguisher checks)
- Financial reports (fiscal accountability pursuant to 12VAC35-105-210)
- Documented medication errors (12VAC35-105.780.5 - review medication errors at least quarterly)
- Instances of property damage or loss
- Personal injury sustained on provider's premises
- Emergency management preparedness and response
- Systemic risk assessment reviews (12VAC35-105-520.C)*

Example – Risk Assessment Reviews

The annual systemic risk assessment review shall be conducted by the risk management committee and documented by the risk manager. The findings of the risk assessment will assist the provider in the next steps of monitoring/reducing/minimizing risks as prioritized by the provider.

The list above is an example. Each organization's risk identification processes will vary depending on the size and scope of the organization.

*As noted in the [Guidance for Risk Management](#) an annual risk assessment review is a necessary component of a provider's risk management plan. The review should include consideration of harms and risks identified and lessons learned from the provider's quarterly

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reviews of all serious incidents conducted pursuant to 12VAC35-105-160.C, including an analysis of trends, potential systemic issues or causes, indicated remediation, and documentation of steps taken to mitigate the potential for future incidents.

12VAC35-105-520.D – The systemic risk assessment process shall incorporate uniform risk triggers and thresholds as defined by the department.

DBHDS has defined risk triggers and thresholds as care concerns which are identified through the Incident Management Unit's review of serious incident reporting. If the provider does not have any identified care concerns, the provider should include documentation of how they would review/address if care concerns do arise. The provider may want to consider incorporating this into their Risk Management Plan.

II. Monitoring Example:

The organization's risk management committee will review and monitor data during monthly risk management committee meetings. The committee will identify year-over-trends and patterns and use baseline data to assess the effectiveness of its risk management system.

While the committee structure allows for maintaining minutes to document discussion, recommendations, and actions, an organization may not have an established committee. If a committee is not established, the provider could outline the process developed to review and document patterns identified and systemic actions taken.

III. Reducing/Minimizing Example:

The systemic risk assessment process conducted at least annually will assist the provider in implementing strategies to reduce/minimize risks.

Based on the risk assessment, the following strategies will be implemented to reduce/minimize risks:

- *Address healthcare acquired infections through increased hand hygiene training/compliance*
- *Minimize personal injury by conducting safety awareness training with employees*
- *Reduce liability by conducting frequent inspections to look for potential hazards related to the property*

This section could outline steps and/or efforts the provider will implement to address identified risks. The provider could look at the convergence of data. For example, how increased overtime may be impacting the rate of serious incidents.

Tip – Best practice is to include a section outlining training/communication.

Example – Employee training/communication

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The provider recognizes that the effectiveness of risk management activities is dependent on the involvement of all employees and contractors. Through pre-service training and other promotional activities, risk reduction strategies will be highlighted.

This section could also include how the organization is committed to transparency with all stakeholders on emerging risks and risk reduction initiatives.

Tip – Best practice is to include a section outlining implementation and evaluation.

Example – Implementation and Evaluation

The organization will constantly evaluate risk reduction strategies to determine effectiveness in reducing/mitigating risks. As new issues are identified through systemic risk assessments, the risk management plan will be reviewed and revised.

The section could also include how the plan will be reviewed in coordination with the quality improvement plan.

The Office of Licensing webpage includes a Guidance and Technical Assistance section which includes Quality Improvement-Risk Management Resources.