



Virginia Department of
Behavioral Health &
Developmental Services

Root Cause Analysis Regulatory Compliance

December 2021

Office of Licensing
Virginia Department of Behavioral
Health and Developmental Services

Goals of the Presentation

- 1. Review Developmental Disabilities (DD) providers' compliance* with the following regulation:**
 - **Root Cause Analysis (12VAC35-160.E.2)**
- 2. Review some issues that were identified when providers were not compliant**
 - Remind providers of available resources

*Data is for January 1, 2021 to September 30, 2021



Goals of the Presentation

3. Review what RCA documents will be requested as part of the annual inspections in 2022.

Annual Inspection Checklist



Some of these documents may be requested in advance as the Licensing Specialists have a lot to review while on site.

Providers need to have these documents ready for review when requested.

12VAC35-105.160.E.2.a-d

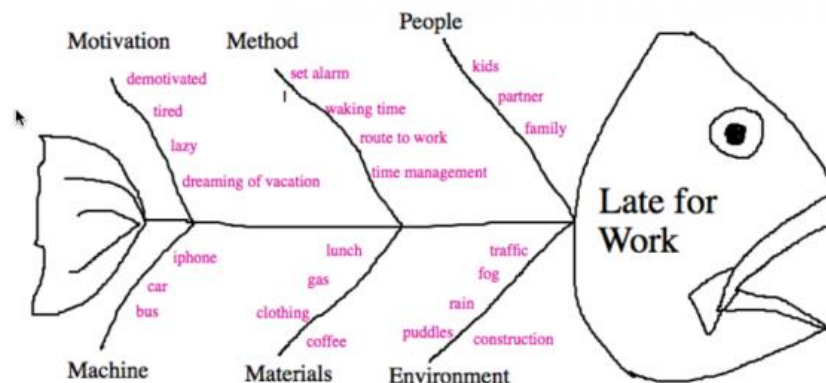
2. The provider shall develop and implement a root cause analysis policy for determining when a more detailed root cause analysis, including convening a team, collecting and analyzing data, mapping processes, and charting causal factors, should be conducted. At a minimum, the policy shall require for the provider to conduct a more detailed root cause analysis when:

- a. A threshold number, as specified in the provider's policy based on the provider's size, number of locations, service type, number of individuals served, and the unique needs of the individuals served by the provider, of similar Level II serious incidents occur to the same individual or at the same location within a six-month period;**
- b. Two or more of the same Level III serious incidents occur to the same individual or at the same location within a six-month period;**
- c. A threshold number, as specified in the provider's policy based on the provider's size, number of locations, service type, number of individuals served, and the unique needs of the individuals served by the provider, of similar Level II or Level III serious incidents occur across all of the provider's locations within a six-month period; or**
- d. A death occurs as a result of an acute medical event that was not expected in advance or based on a person's known medical condition.**



Root Cause Analysis Policy

Regulation	Compliance*
160.E.2	80%
160.E.2.a	65%
160.E.2.b	72%
160.E.2.c	65%
160.E.2.d	74%



Identified Issues

Providers did not have a root cause analysis policy to include when a more detailed RCA would be conducted.

Providers copied and pasted the regulatory language.

"a threshold number" needs to be determined by the organization.



2022 Inspections

Root cause analysis policy will be requested.

Prepare:

- ✓ Update the RCA policy in accordance with the Final DOJ Regulations (effective August 2020)
- ✓ Determine the "threshold number" for more detailed RCAs