

Policy No. 10

Issued: 10-11-07

Revised: 11-13-24

Reviewed: 11-13-24

SUBJECT: Organizational Risk Management Policy

PURPOSE: To establish a policy for a standard operating procedure for the organization.

PRINCIPAL: To assure conformance with National Accreditation and regulations of all governmental authorities under which we operate.

Woodhaven has adopted a comprehensive risk management policy. The organization strives to identify, assess, prevent and effectively manage all levels of risk; pursue opportunities for continuous quality improvement; and protect vital assets and resources. This commitment is evident in Woodhaven's mission, values, policies, procedures, and operations both at the programmatic and administrative level. The agency has adopted a risk management structure which draws upon the wisdom and expertise of multiple stakeholders including individuals receiving services, employees, Board of Directors, Leaders Embracing Advocacy and Diversity (LEAD) Council, oversight agencies and other internal and external resources.

Programmatic

Woodhaven maintains protocols to ensure consistency and identify areas of risk on a programmatic level. These include the implementation of controls in areas such as: continuous quality improvement, human rights, health and safety and external oversight survey through national accreditation.

Quality Enhancement and Compliance

The continuous quality improvement system was implemented to review and develop a "best practices" approach to positive risk management throughout the organization. Woodhaven, through its quality enhancement process collects and analyzes data as outlined per the quality enhancement procedure and annual outcome management report. The following variables will be monitored on a regular basis to reduce risk:

- Quality Enhancement issues that are identified by the Quality Enhancement (QE) Team.
- Failure of a work force member to participate in a recommended training or educational activity or other activity recommended by the QE team or required of any federal or state authority, accrediting body, third party payer or Woodhaven Administrative Team.
- Voluntary or involuntary suspension, supervision or reprimand due to QE and Code of Conduct concerns.
- Any change in a work force members standing under Federal or State authority, third party payer or health care organization.
- Any other information pertaining to the issue of quality of care or safety associated with treatment of an individual receiving services or family.
- Assess trends of client complaints.
- Failure to comply with national accreditation standards.

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Consumer Satisfaction

A consumer satisfaction reporting process has been developed within the agency's quality enhancement system for internal and external stakeholders, individuals supported, and their families to formally or informally communicate concerns. A mechanism is included to provide feedback to stakeholders, individuals supported and their families in a timely fashion. In addition, individuals supported outcomes data are reviewed and monitored by program and administrative personnel regularly during the year.

Accreditation Recommendation and Consultation

Woodhaven minimizes risk by striving to maintain the best practice standards and having external objective reviews of the provision of services. Because of the importance of this process in reducing risk, Woodhaven has received a three-year award of accreditation from the Commission on Accreditation of Rehabilitative Facilities since 1995. In addition, Woodhaven has CARF surveyors on its leadership team.

Openness

Woodhaven regularly communicates with the following entities around operational issues in order to ensure the best quality of care and decrease risk to the agency.

- CMRO – Central Missouri Regional Office
- Missouri Department of Mental Health/MR/DD
- MO-ANCOR – American Network Community
- CARF – Commission on Accreditation of Rehabilitative Facilities
- APSE – Association of People Supporting Employment
- BCFR – Boone County Family Resources
- Starling
- DESE – Department of Elementary and Secondary Education
- Vocational Resources

Clinical Practice – In an effort to maintain best practice standards for clinical protocol, Woodhaven strives toward the following:

1. A proactive person-centered service philosophy and process for ensuring persons receiving services feel respected, welcomed and a part of the decision making process.
2. An understanding of the state or court-mandated services and how these affect the cost of providing services.
3. A well-developed set of decision-making tools that drive treatment decision (IP Individual plans) such as social and clinical necessity criteria, level of care and evidence based practices.

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4. Education of the individuals supported during the treatment assessment process regarding services needed. Treatment risk assessments are conducted on each person supported annually and updated on an on-going basis or as needed.
5. Mixed service protocols to facilitate collaboration of services delivered between the behavioral, welfare, social services and medical providers when the persons supported presenting problem is a combination of the above issues.
6. Crisis assessment and crisis management available 24 hours a day, 365 days a year to de-escalate crisis situations as well as assess and ensure individuals are referred to an appropriate level of care or problem resolution.

Human Rights

Woodhaven promotes the rights of persons served by protecting confidentiality of information, privacy, and freedom from abuse, neglect, financial or other exploitation. The Administrative and Program teams monitors the agency adherence to all human right regulations in all it's programs in accordance with those regulations established by the state in which we operate. Woodhaven conducts annual staff training, reviews all incidents/complaints, communicates to external funding/referral agencies and formally analyzes at least annually to identify and make recommendations. (See Annual Report). Any incident report that is deemed health and safety oriented is forwarded to the Director of Health Services and Quality Assurance.

Consumer record procedures have been developed and are included in the Woodhaven Policies and Procedures. The individual's records are owned by Woodhaven and will be kept in accordance with state, federal and accrediting body requirements.

To reduce risk, the following will occur:

- Access to the records will be limited to appropriate staff members and external monitors.
- Release of information procedures will meet all state and federal requirements and will be monitored through the Record Review Process.
- Staff member will be trained in documentation standards and requirements.

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- Records will regularly be reviewed for compliance with regular reports to supervisors and administration as part of the quality enhancement process.

Health and Safety Committee

The Health & Safety committee was established to continually enforce and improve formal policies and procedures regarding staff and consumer safety. Regular and periodic safety inspections by internal and external sources will identify potential risks and will recommend changes to protect the health and safety of individuals receiving support and staff. Using collected data, the committee tracks and monitors trends, replicates best practices and implements preventative measures to proactively trouble shoot potential risks. The Health & Safety committee is responsible for the following functions within the risk management program:

- a. Review and follow-up of all incident and events reports.
- b. Prepare incident report tracking and trends periodically, but no less than annually. These include recommendations for actions to reduce risk with follow-up performed to determine if actions taken were effective. The Health & Safety Committee meet at least quarterly. Recommendations are forwarded to the Chief Executive Officer for follow-up. (See Health & Safety minutes).
- c. Function as a resource to work force members on risk management issues and questions.
- d. The committee supports the standards and implementation of staff training, including the training required to promote a safe work environment for staff and individuals supported.
- e. Emergency and disaster drills performed per Woodhaven Procedures.
- f. Monitoring of work place accidents and injuries.

Administrative

Woodhaven maintains systems and protocols that identify and control risk that may be present in operations, staffing, service delivery and governance activities. The agency develops and implements practical strategies for preventing losses and minimizing the impact of losses when they occur. Potential areas of exposure include human resource issues, insurance risks, legal exposure, information technology systems and financial risk.

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Human Resources/Staff Development

The Human Resource office conducts background checks including criminal background, motor vehicle record checks, references and credentials for new and current employees. New employees receive extensive in-service training. The agency conducts reviews of Woodhaven's comprehensive benefits package, employee handbook, business and professional ethics and related policies. In addition, the new employee orientation provides a comprehensive overview of the agency's operations. The agency's multi-tiered supervisory training includes screening and hiring, on-going supervision and performance appraisal system (pay-for-performance) and discipline and termination. Woodhaven has an integrative approach whereby the Human Resource office provides consultation to all management staff to provide consistency in implementing policy and disciplinary action. This approach is proactive in minimizing risk or limiting potential risk. The following are areas addressed to reduce risk:

- a. An appeal and grievance process is in place for employees to review disagreement and decisions.
- b. A well instructed, credentialed, culturally diverse, competent and trained work force that understands and accepts Woodhaven service and treatment philosophy and business values.
- c. Coordinate, plan and implement educational programs to minimize the risk of harm to individual support staff.
- d. Function as a resource to work force members on risk management issues and questions.
- e. Wide range of training provided by expert internal and external trainers.

Work Force Practices

Recognized Human Resource practices are essential for a comprehensive risk management program. These are available in Human Resources and many are included in the Policy and Procedure manual. These include: Job descriptions; New Employee orientation; Code of Ethics and Conduct; Workers Compensation; Defensive Driving Training; Americans with Disabilities Act; Family and Medical Leave Act; Sexual Harassment; Safety Guidelines; Emergency Preparedness Plan; Health Insurance; Portability and Accountability Act of 1996 (HIPAA); Progressive Counseling Guidelines, etc.

In addition, Woodhaven has an Employee Relations Committee who serves as an advisory committee to the Leadership Team. The responsibility of this committee is to give recommendations of methods to obtain and maintain competent, ethical and qualified staff to provide the services essential to the achievement of Woodhaven's stated goals, and to assure a non-discrimination policy, procedures and rules with regard to employment, promotion, pay or place of work because of race, creed, national origin, sex, disability, age or veteran status.

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EAP-Employee Assistance Program

The Employee Assistance Program is a confidential assessment, short-term counseling and referral service that provide direction to troubled employees and their families. Because we care about our valued work force, the agency provides this benefit. We recognize that personal problems arise that can affect job performance. Seeking help with problems is a healthy way to one's life and career on a steady course. We feel having the EAP also minimizes risk.

Organizational Management (Administrative Operations)

Woodhaven maintains comprehensive insurance for risk related to all area's of operations. These include but are not limited to General Liability including professional liability, umbrella liability including property and automobile coverage, directors and officer's liability insurance, employment practices liability, workers compensation and unemployment compensation and claims management.

Administration

1. A master contract that includes well-defined services and expectations from funders, including the exclusions and limitations.
2. The ability to access financial resources, bank line of credit and to handle the operational expenses of the agency.
3. The ability to track all costs on a year to date basis including the operational costs and all costs of purchasing services.
4. Leadership team awareness and "buy-in" regarding the contractual and clinical arrangements and requirements under which the agency needs to operate.

Legal Matters

Woodhaven has identified attorneys to represent the organization regarding legal matters and potential litigation. These attorney's have expertise in the human services sector and are highly knowledgeable regarding Woodhaven's business practices. When necessary, the agency consults with these attorney's regarding business practices including policies and procedures.

Woodhaven's Information and Technology Plan identifies and safeguards the privacy, confidentiality, and security of information of all electronic systems. Additionally, the plan addresses effective "back up" of data as well as procedures to respond to disaster recovery. (See Technology Plan)

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Financial

The purpose of the financial risk management plan is to control the impact of adverse financial circumstances and prevent the severity of any financial loss as well as safeguard the organizations assets. The components of the plan include identifying loss exposure and developing a plan to remedy potential losses. Internal financial controls are in accordance with GAAP (General Accepted Accounting Principles) standards and meet federal and state requirements. (See Financial Risk Management Plan)

The Risk Management Team is responsible for implementing and coordinating the Risk Management Plan. The Risk Management Team has authority to do what is necessary to carry out the functions and activities of the internal risk management program.

The risk management team will meet formally on a semi-annual basis to identify current and potential risks in all areas identified above and establish a plan of correction to address risk issues. Members of the Risk Management/Administrative Team include the CEO, COO, CFO, and the Director of Human Resources.

Fundraising/Development

The Development Team is responsible for fundraising and public relations. Through the use of the Development Team, Woodhaven addresses policy development and review for fundraising, marketing and public relations opportunities, consistency and standardization for all agency forms and replication of the best practices. Documents are reviewed by the Development and Leadership Teams regularly to minimize risk. The Development Team includes the CEO, CDO, Grants Manager, Communications Manager, and Outreach and Engagement Specialist.

Conclusion

Woodhaven is committed to ensuring that quality client care is the cornerstone of its success by promoting a safe environment along with preventing and minimizing financial losses. By implementing the above plan, Woodhaven’s monitoring of risk will minimize risks thereby promoting the mission of the organization.

Reviewed by: _____ Date: _____
Chief Executive Officer

Approved by: _____ Date: _____
Board of Directors President