

Sentinel Event Policy

Purpose. To identify the procedure for responding to sentinel events reported in an organization actively involved in Joint Commission International's (JCI) accreditation or certification process.

Policy

- 1) JCI Accreditation reviews organizational activities in response to sentinel events in its accreditation or certification process, including full accreditation or certification surveys (initial and triennial) and, as appropriate, focused surveys.
- 2) At a minimum, an organization must include those events in its sentinel event policy that are subject to review described under the standard that addresses sentinel events from the accreditation program for which they are applying and the JCI Sentinel Event Policy.
- 3) Accredited organizations and certified programs are expected to identify and respond appropriately to all sentinel events occurring in the organization or associated with services that the organization provides, or provides for. Appropriate response includes conducting a timely, thorough, and credible root cause analysis; developing an action plan designed to implement improvements to reduce risk; implementing the improvements; and monitoring the effectiveness of those improvements.
- 4) A root cause analysis will be considered acceptable if it has the following characteristics:
 - The analysis focuses primarily on systems and processes, not individual performance.
 - The analysis focuses on specific causes in the clinical care process as well as common causes in the organizational process.
 - The analysis repeatedly digs deeper.
 - The analysis identifies changes that could be made in systems and processes (either through redesign or development of new systems or processes) that would reduce the risk of such events occurring in the future.
- 5) A reviewable sentinel event is subject to review by JCI Accreditation and includes any occurrence that meets defined criteria (*see* point 2 above).
- 6) If an organization wishes to report an occurrence that is subject to review by JCI Accreditation, the organization can submit the report to JCI Accreditation.
- 7) If JCI Accreditation becomes aware (either through voluntary self-reporting or otherwise) of a sentinel event that meets the above criteria and the event has occurred in an accredited organization or certified program, the organization is expected to do the following:
 - Prepare a thorough and credible action plan within 45 calendar days of the event or of becoming aware of the event.
 - Submit to JCI Accreditation its root cause analysis and action plan, or otherwise provide for JCI Accreditation evaluation of its response to the sentinel event.
 - After JCI Accreditation determines that an organization has conducted an acceptable root cause analysis and developed an acceptable action plan, JCI Accreditation notifies the organization that the root cause analysis and action plan are acceptable and assigns an appropriate follow-up activity, typically a Strategic Improvement Plan (SIP) due in four months.
- 8) An event that occurred more than one year before the date JCI Accreditation became aware of the event may not, in most cases, be reviewed under the Sentinel Event Policy. In such a case a written response will be requested from the organization, including a summary of the processes in place to prevent similar occurrences.
- 9) All root cause analyses and action plans will be considered and treated as confidential by JCI Accreditation.

Joint Commission International Accreditation and Certification Policies

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- 10) An on-site review of a sentinel event will usually not be conducted unless it is determined that there is a potential ongoing immediate threat to patient health and safety. All are immediately referred to JCI Accreditation for authorization to conduct a focused survey. If a focused survey is conducted as a result of a threat to health and safety, the organization will be billed an appropriate amount based on the established fee schedule to cover the cost of conducting such a survey.
- 11) If in the course of conducting the usual survey activities a sentinel event is identified, the surveyor will take the following steps:
 - Inform the organization’s CEO that the event has been identified.
 - Inform the CEO that the event will be reported to JCI Accreditation for further review and follow-up under the provisions of the Sentinel Event Policy.
- 12) During the on-site survey, the surveyor(s) will assess the organization’s compliance with sentinel event–related standards in the following ways:
 - Review the organization’s process for responding to a sentinel event.
 - Interview the organization’s leaders and staff about their expectations and responsibilities for identifying, reporting, and responding to sentinel events.
 - Ask for an example of a root cause analysis that has been conducted in the past year to assess the adequacy of the organization’s process for responding to a sentinel event. Additional examples may be reviewed if needed to more fully assess the organization’s understanding of and ability to conduct root cause analyses. In selecting an example, the organization may choose a “closed case” to demonstrate its process for responding to a sentinel event.
- 13) If JCI Accreditation receives an inquiry about the accreditation or certification decision of an organization that has experienced a reviewable sentinel event, the organization’s accreditation or certification decision will be reported in the usual manner without making reference to the sentinel event. If the inquirer specifically references the specific sentinel event, JCI Accreditation will acknowledge that it is aware of the event and currently working or has worked with the organization through the sentinel event.