

Vermont Psychiatric Care Hospital Policy and Procedure		
Root Cause Analysis and Peer Review		
Effective: October 2024	Revised:	Due to Review: October 2026

POLICY

This policy establishes Vermont Psychiatric Care Hospital’s (VPCH) method for timely peer-protected review and causal analysis of safety events, critical incidents, and quality data for quality improvement purposes. In accordance with Vermont’s Patient Safety Surveillance Improvement System (PSSIS), this policy also sets forth the procedure under which VPCH will develop and identify Patient Safety Work Product (PSWP) for the purpose of such review.

DEFINITIONS:

Root Cause Analysis (RCA): informed and objective process for identifying, trending, and addressing the causes and effects of a challenge or problem.

Peer Review: the procedure for evaluation by professional health care providers of the quality and efficiency of services ordered or performed by other professional health care providers.

Patient Safety Work Product (PSWP): Any data reports, records, memoranda, analyses (such as Causal Analyses and Quality Debriefs), or written or oral statements (or copies of any of this material) which could improve safety, health care quality, or health care outcomes and that:

1. are assembled or developed by VPCH for peer review or causal analysis, which includes information that is documented as within a PSSIS, and such documentation includes the date the information entered the PSSIS or
2. are developed by the Quality and Patient Safety Department and/or the VPCH Peer Review Quality Committees to conduct patient safety activities, or
3. which identify or constitute the deliberations or analysis of, or identify the fact of reporting pursuant to, PSSIS.

PSWP is protected by the privilege and confidentiality protections of the Patient Safety Act and Patient Safety Rule and 26 V.S.A. §1443.

PROCEDURE

A peer review or RCA may be initiated when circumstances warrant or as requested by a member of the VPCH executive leadership team. The implementation of an RCA or peer review and the type(s) of analyses required will be at the discretion of the VPCH Quality Director, or their designee. In accordance with VPCH policy and regulatory requirements, the VPCH Quality Department will facilitate RCAs and peer reviews.

A team identified by the VPCH Quality Department will conduct RCA and peer review, including at a minimum the Executive Medical Officer (EMO), the Chief Executive Officer (CEO), and the director of the related department/program. Other involved stakeholders will be


determined by the Quality Department on a case-by-case basis and may include identified subject experts, clinical staff, etc.

Information submitted for peer-review or causal analysis is to be labeled as PSWP and is privileged, confidential, and exempt from discovery in any legal action per Vermont's Peer Review Statute (26 V.S.A. § 1443).

It is the responsibility of the VPCH Quality Director, or their designee, to coordinate resources when conducting a review, to influence areas of risk management and policy, and to manage the development and dissemination of corrective actions to help assure best practices and the highest quality of care.

References:

- <https://www.vpqhc.org/pssis-vpqhc>

Approved by	Signature	Date
Emily Hawes, Commissioner, Vermont Department of Mental Health	 <p>DocuSigned by: <i>Emily Hawes</i> C50275615A62462...</p>	10/15/2024