



Division of Behavioral Health Services

Division of Compliance

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TO: T/RBHA Medical Directors, Quality Management Directors and Utilization Management Directors

FROM: Laura K. Nelson, M.D.
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SUBJECT: POLICY CLARIFICATION: Mortality Review

DATE: August 2, 2010

This memorandum is intended to clarify the responsibilities of Tribal and Regional Behavioral Health Authorities (T/RBHAs) and T/RBHA providers in meeting the Arizona Department of Health Services/Division of Behavioral Health Services' (ADHS/DBHS) expectations regarding requirements in the following ADHS/DBHS documents:

- [ADHS/DBHS Provider Manual Section 7.4, Reporting of Incidents, Accidents and Deaths](#);
- [ADHS/DBHS Policy and Procedure Manual Section GA 3.7, Review of Deaths of All Behavioral Health Recipients](#); and
- [ADHS/DBHS Policy and Procedure Manual Section QM 2.5, Reporting of Incidents, Accidents and Deaths](#).

[ADHS/DBHS Provider Manual Section 7.4, Reporting of Incidents, Accidents and Deaths](#), Section 7.4.7-C, contains reference to the ADHS/DBHS Mortality Review Form, which has been discontinued. As of July 1, 2010, the Mortality Review Form and its addendum have been replaced with the ADHS/DBHS Quality of Care Concern investigation process for reported deaths. Discontinuation of the stand alone mortality review promotes candid disclosure of deficiencies and corrections and allows for more effective tracking and trending of behavioral health recipient deaths under the auspices of the Quality of Care Concern process.

[ADHS/DBHS Policy and Procedure Manual Section GA 3.7, Review of Deaths of All Behavioral Health Recipients](#) will be removed from the ADHS/DBHS Policy and Procedures Manual, as the ADHS/DBHS Mortality Review Form and process has been discontinued. The Mortality Review Form and its addendum are being replaced with the ADHS/DBHS Quality of Care Concern investigation process and the ADHS/DBHS Peer Review process.

[ADHS/DBHS Policy and Procedure Manual Section QM 2.5, Reporting of Incidents, Accidents and Deaths](#) describes reporting requirements to various entities. Consistent with the changes described above, Incident, Accident and Death reports concerning all enrolled persons, including those in need of special assistance and reports of sexual and physical abuse and neglect must be reported to the ADHS/DBHS Bureau of Quality Management Operations (BQMO). Copies of the report must be submitted to the ADHS/DBHS BQMO per the assigned T/RBHA submission date. Reporting

instructions are outlined in the [Submission of Incident, Accident and Death Reports](#) and will be contained in the next revision of the [ADHS/DBHS BQMO Specifications Manual](#).

ADHS/DBHS will also incorporate these changes during the next revision of [ADHS/DBHS Provider Manual Section 7.4, Reporting of Incidents, Accidents and Deaths](#) and [ADHS/DBHS Policy and Procedure Manual Section QM 2.5, Reporting of Incidents, Accidents and Deaths](#). Until such time that the new policies become available to T/RBHAs and T/RBHA providers, T/RBHAs and T/RBHA providers must implement and comply with changes addressed in this ADHS/DBHS Policy Clarification Memorandum.

Questions regarding this clarification may be directed to the ADHS/DBHS Policy Office at (602) 364-4670.