

# Implementation of a Risk Management Training Program

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Kepro

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Health Resources and Services Administration (HRSA)

U.S. Department of Health and Human Services (HHS)

10/14/21



# Reminders

- Please complete a post webinar survey.
- Instructions on how to access the post webinar survey and obtain a Certificate of Completion will be provided at the end of the presentation.
- You must complete a post webinar survey to receive a Certificate of Completion.
- The post webinar survey will be closed on 09/30/22.
- After the survey closes, Certificates of Completion will not be issued.

# Learning Objectives

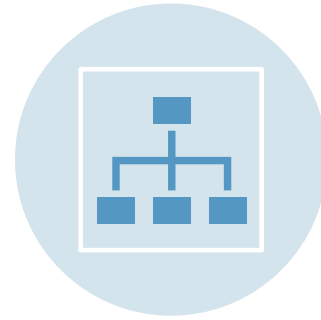
- Discuss expectations and requirements for a risk management training plan.
- Understand how to develop a policy and structure for a risk management training plan.
- Identify resources that can be used during creation/enhancement of a risk management training plan.
- Describe how to demonstrate compliance with risk management training requirements.

# Polling Question #1

# Why Risk Management Training is Important



Provides common language and framework for a robust and proactive approach to risk reduction and risk mitigation



Defines individual roles, responsibilities, and accountability within the context of the organization's risk management program



Fosters support and cooperation among senior leadership and staff for risk management and a culture of safety



Supports regulatory, accreditation, and compliance needs and meets requirement for deeming under FTCA

# Deeming Application



## Polling Question #2

# Deeming Application



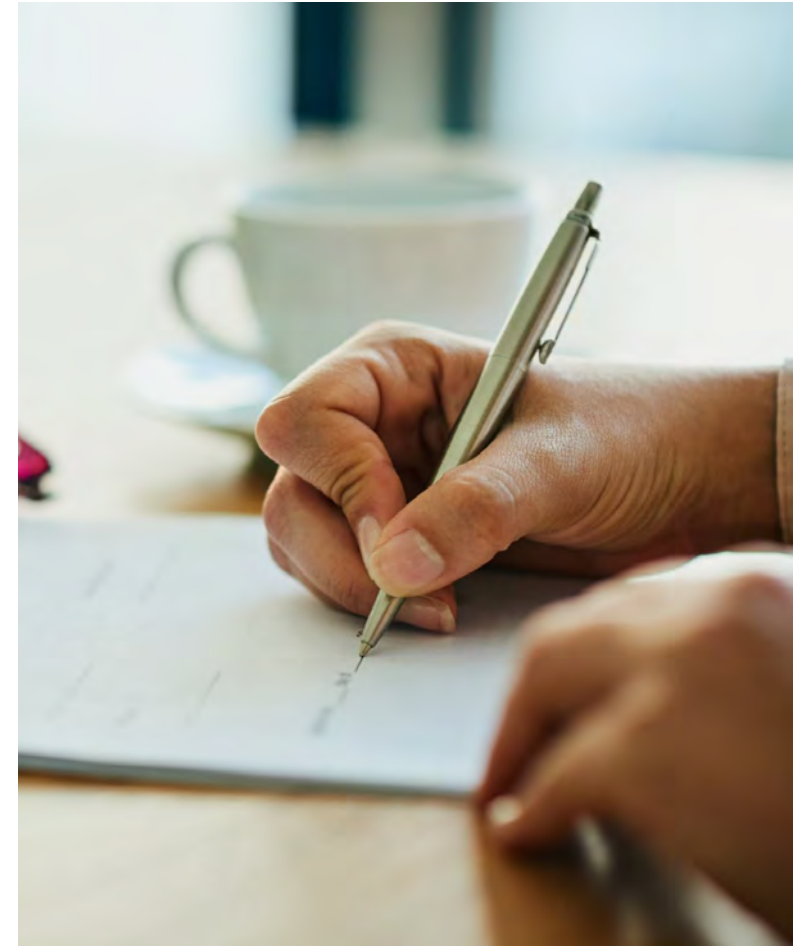
Health centers submitting FTCA deeming applications are required to provide an annual risk management plan that should be based on identified risks including all the required trainings outlined in the annual FTCA application. Health centers should refer to the FTCA annual program assistance letter (PAL) to determine what trainings are required for the year.

ECRI: FTCA Application Demonstration of Compliance Tool: Risk Management Training Plan Edition  
[https://www.ecri.org/components/HRSA/Documents/SPT/PSRM/508\\_FTCA\\_A\\_Compliance\\_Tool\\_Risk\\_Management\\_Training\\_Plan.pdf](https://www.ecri.org/components/HRSA/Documents/SPT/PSRM/508_FTCA_A_Compliance_Tool_Risk_Management_Training_Plan.pdf)



# Deeming Application Attestations

The Review of Risk Management Systems portion of the FTCA deeming/redeeming application contains attestations specifically related to risk management training for all staff. This information can also be found in the Health Center Program Compliance Manual, Chapter 21: Federal Tort Claims Act (FTCA) Deeming Requirements.



# Deeming Application: Attestation - Review of Risk Management Systems (Slide 1 of 4)

## PROGRAM:

1(A). I attest that my health center has implemented an **ongoing risk management program** to reduce the risk of adverse outcomes that could result in medical malpractice or health-related litigation and that this program requires the following:

- ii. **Health care risk management training for health center staff.**

# Deeming Application: Attestation - Review of Risk Management Systems (Slide 2 of 4)

## PROCEDURES:

2(A). I attest that my health center has implemented **risk management procedures** to reduce the risk of adverse outcomes that could result in medical malpractice or other health or health-related litigation. At a minimum, these procedures specifically address the following:

iv. Developing and implementing an **annual health care risk management training plan for all staff** members that addresses the following identified areas/activities of clinical risk: medical record documentation, follow-up on adverse test results, obstetrical procedures, and infection control, as well as training in Health Insurance Portability and Accountability Act (HIPAA) and other applicable medical record confidentiality requirements.

# Deeming Application: Attestation - Review of Risk Management Systems (Slide 3 of 4)

## PLAN:

3(A). I attest that my health center has developed and implemented an **annual health care risk management training plan for staff members** based on identified areas/activities of highest clinical risk for the health center. These training plans include detailed information related to the health center's tracking/documentation methods to ensure that trainings have been completed by the appropriate staff, including all clinical staff, at least annually.

# Deeming Application: Attestation - Review of Risk Management Systems (Slide 4 of 4)

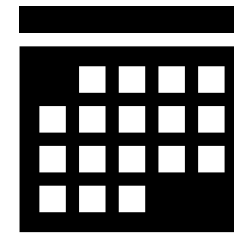
3(A). I attest that the training plans **at a minimum** also incorporate the following:

- Obstetrical procedures
  - Health centers that provide obstetrical services through health center providers need to include obstetrical training as part of their risk management training plans. This includes health centers that provide prenatal and postpartum care through health center providers, even if they do not provide labor and delivery services.
- Infection control and sterilization
- HIPAA medical record confidentiality requirements
- Specific trainings for groups of providers that perform various services which may lead to potential risk

# Risk Management Training

# Make Training A Priority (Slide 1 of 2)

- Set Training Goals:
  - Create clear expectations
  - Set a schedule for which courses are required and deadlines for completion
  - Allocate adequate time for staff to complete required trainings



# Make Training A Priority (Slide 2 of 2)



- Make sure learning is ongoing
  - Provide staff with supplementary material to which they can refer at any time (e.g., copies of policies and procedures, risk assessment manual)
  - Provider “refresher” trainings on a regular basis
  - Be available to all staff and learn what additional resources are needed
  - Make the most of every “teachable moment”



# Risk Management Training



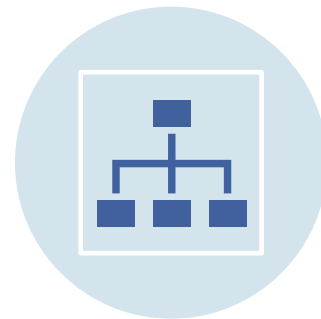
Risk management training should begin at new employee orientation.



Annual ongoing risk management training is required for all health center leadership, staff and providers.



The board should receive ongoing education regarding the organization's risk management training program.



The risk management training plan should be included in the annual report to the board of directors.

# Creating a Policy and Structure for a Risk Management Training Plan (Slide 1 of 2)

The risk management training plan should contain:

- Policy Statement: A one or two sentence statement about the plan
- Purpose: Describe the reason for the plan
- Scope: Identify to whom and how the policy applies
- Procedures for Implementation: Step-by-step instructions for implementing the training plan
- Provider and Staff Responsibilities: Roles of different key individuals and staff involved in the risk management training process
- Definitions: Terms associated with education and training that may require definition

# Creating a Policy and Structure for a Risk Management Training Plan (Slide 2 of 2)

The risk management training plan should contain:

- Related policies, documents, and forms: List all related policies and procedures
- References: All references applicable to this policy, including any relevant federal and state laws and regulations and accreditation standards
- Policy contact: The name of a person or department responsible for the policy to be listed as the contact for addressing questions about the policy

# Risk Management Training Plan

A comprehensive risk management training plan should describe:

- How the program works and is implemented on an annual basis
- The required training and the selection process for required training
- The sources that are utilized for training (examples: HRSA, ECRI, NACHC, AMA)
- That all levels of staff participate in the training program
- Timeframe for completion of each training
- The tracking and documentation process to ensure training has been completed
- Compliance enforcement and monitoring methods to ensure completion

## Case Study: Health Center X (Slide 1 of 2)

Health Center X has developed an annual risk management training plan. It outlines the training that is to be completed by all levels of staff. Included in the plan is risk management training for obstetrical procedures, infection control, HIPAA medical record confidentiality requirements, and training specific to dental services provided at their facility. In addition, training regarding event reporting, telehealth, and falls will take place as those topics were identified as areas of high risk the previous year. A combination of E-learning, and webinars will be utilized for the training. Courses will be assigned on a monthly basis, with 30 days allowed for completion.

## Case Study: Health Center X (Slide 2 of 2)

A spreadsheet will show documentation of the specific topics, course titles, source of the training, the names and credentials of the staff who are to complete the training, date assigned, and date completed. Staff who do not complete required training in a timely manner are subject to disciplinary action.

# Case Study: Health Center Y

Health Center Y has developed an annual risk management training plan. Handwashing and HIPAA training is provided each year for clinical staff. The charge nurse is responsible for providing the education which includes a combination of one-on-one training with a return demonstration of handwashing technique, and an article regarding medical records confidentiality is handed out and staff are responsible to read it on their own time and complete 10 test questions. Staff have all year to complete the required training. Completion rates are reported to the Board. Obstetrics training is not included in the annual risk management training plan as only prenatal and postpartum care is rendered at the health center, and labor and delivery services are not provided by health center employees.

## Polling Question #3



## Polling Question #4

# FTCA Requirements for Risk Management Training

- Training plans **at a minimum** must incorporate the following:
  - Obstetrical procedures (e.g., continuing education for electronic fetal monitoring, dystocia drills)
  - Infection control and sterilization (e.g., bloodborne pathogen exposure protocol, infection prevention and control policies, hand hygiene training and monitoring program, dental equipment sterilization)
  - HIPAA medical record confidentiality requirements
  - Specific trainings for groups of providers that perform various services which may lead to potential risk (for example, dental, pharmacy, family practice)

# Selection of Risk Management Training Topics

- Risk management training topics should be selected based on the areas/activities of highest clinical risk for the health center as identified by:
  - Quarterly risk assessments
  - Culture of safety surveys
  - Patient safety leadership walkrounds
  - Quality measures and data
  - Uniform data system (UDS) measures
  - Patient feedback and complaints
  - Employee feedback
  - Healthcare literature
  - Claims trends from similar healthcare settings
  - FTCA deeming application or site visit feedback
  - State licensure surveys
  - Consultant's reports

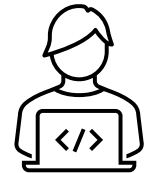
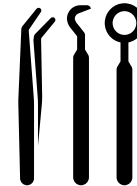
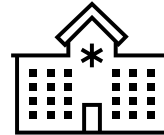
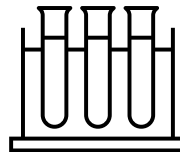
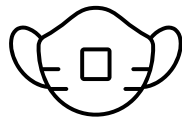
# Risk Management Training for All Health Center Staff

- Recommended (but not required by HRSA):
  - Event reporting
  - Complaints
  - Sexual harassment and misconduct in healthcare
  - Cultural sensitivity
  - Communication
  - Culture of safety
  - Teamwork strategies
  - Other (e.g., telehealth, falls, etc.)

# Risk Management Training for Staff Serving in Clinical Roles

## ■ Specialty Services

- Required: Infection control and sterilization of equipment
- Recommended (but not required by HRSA):
  - Tracking referrals
  - Tracking diagnostic tests
  - Tracking hospital admissions ordered by health center providers



# Risk Management Training – Clinical Specialty: Obstetrics (Slide 1 of 2)

- Health centers that provide obstetrical services through health center providers need to include obstetrical training as part of their risk management training plans. This includes health centers that provide prenatal and postpartum care through health center providers, even if they do not provide labor and delivery services.



# Risk Management Training – Clinical Specialty: Obstetrics (Slide 2 of 2)

- Examples of obstetric training:
  - Prenatal care
  - Postpartum care
  - Electronic fetal monitoring
  - Shoulder dystocia
  - Operative vaginal delivery





# Risk Management Training – Clinical Specialty: Dental

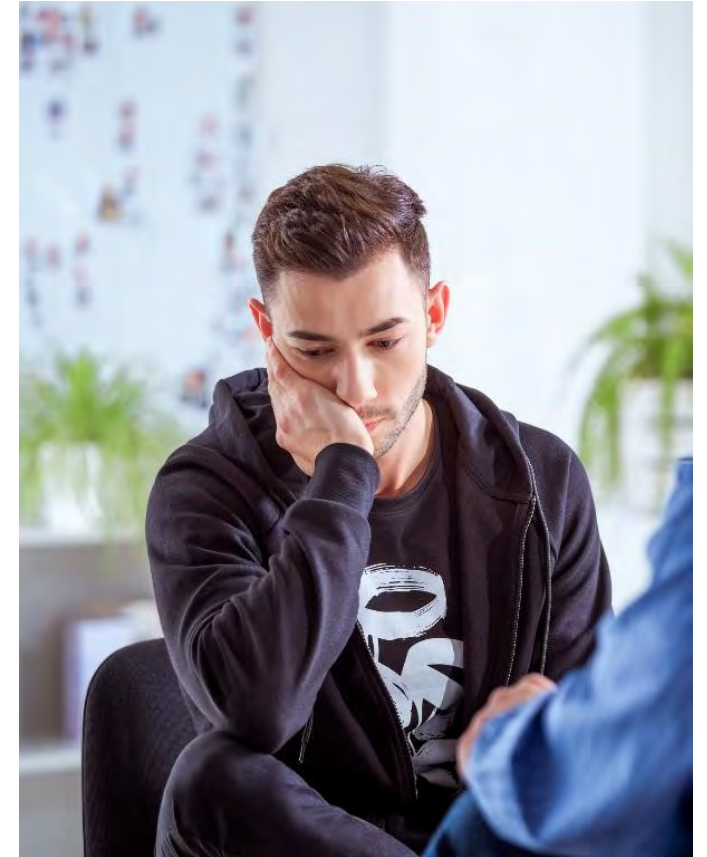
- Health centers that provide dental/oral health services should provide training for clinical staff in identified high-risk areas specific to the setting.
  - Infection control for aerosolized procedures
  - Sterilization of dental equipment
  - Medical emergencies in the dental office
  - Informed consent for dental procedures



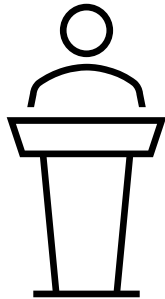
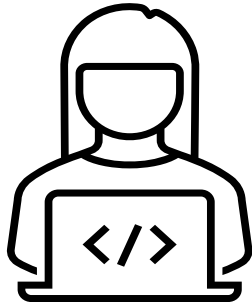
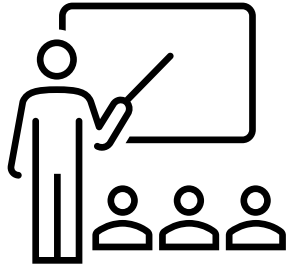


# Risk Management Training – Clinical Specialty: Behavioral Health

- Health centers that provide behavioral health services should provide training for clinical staff in identified high-risk areas specific to the setting.
  - Screening assessment
  - Patient communication/coaching
  - Opioid risk management/medication-assisted treatment
  - Substance use disorder assessment and/or treatment
  - Patient suicide assessment and/or treatment



# Risk Management Training Formats



- Traditional classroom instructor-led training
- Train-the-trainer programs
- On-line self learning activities (E-learning)
- Webinar training
- Education provided by outside vendors or experts

# Demonstration of Compliance (Slide 1 of 2)



A standardized tracking tool should clearly demonstrate that all staff members (clinical and non-clinical) have completed all required trainings (e.g., EXCEL document, tracking reports).



If all staff have not completed training in a timely manner, the tracking tool or other submissions should demonstrate corrective action plans that have been implemented.

# Demonstration of Compliance (Slide 2 of 2)

- The tracking tool should include:
  - Topic – required training element - be specific rather than broad
  - Course title
  - Format
  - Source
  - Name and credentials of staff completing the course
  - Date assigned
  - Due date
  - Date completed

# Demonstration of Compliance - Incomplete

| 2021            | Obstetric Training | Infection Prevention | HIPAA |
|-----------------|--------------------|----------------------|-------|
| Nancy Jones     | X                  |                      | X     |
| Brian Smith     | X                  | X                    | X     |
| Ralph Carlson   | X                  | X                    | X     |
| Cecilia McCaw   |                    | X                    | X     |
| Roger Grant     | X                  |                      | X     |
| Amanda Williams | X                  | X                    | X     |
| John Lewis      |                    | X                    | X     |

# Demonstration of Compliance

| 2021                | Hand Hygiene             | Medical Records Confidentiality | Blood Borne Pathogens | Event Reporting       | Falls                  | Telehealth          |
|---------------------|--------------------------|---------------------------------|-----------------------|-----------------------|------------------------|---------------------|
| Assigned:           | I:I training<br>01/01/21 | E-learning<br>02/01/21          | Webinar<br>03/01/21   | Classroom<br>04/01/21 | Self-Study<br>05/01/21 | Webinar<br>06/01/21 |
| Nancy Jones, MD     | 01/14/21                 | 02/05/21                        | 03/01/21              | 04/01/21              | 05/22/21               | 06/01/21            |
| Brian Smith, MD     | 01/14/21                 | 02/16/21                        | 03/01/21              | 04/01/21              | 05/15/21               | 06/01/21            |
| Ralph Carlson, RN   | 01/29/21                 | 02/01/21                        | 03/01/21              | 04/01/21              | 05/19/21               | 06/01/21            |
| Cecilia McCaw, RN   | 01/14/21                 | 02/19/21                        | 03/01/21              | 04/01/21              | 05/28/21               | 06/01/21            |
| Roger Grant, LPN    | 01/17/21                 | 2/28/21                         | 03/01/21              | 04/01/21              | 05/13/21               | 06/01/21            |
| Amanda Williams, MA | 01/26/21                 | 02/17/21                        | 03/01/21              | 04/01/21              | 05/16/21               | 06/01/21            |
| John Lewis, MA      | 01/18/21                 | 02/01/21                        | 03/01/21              | 04/01/21              | 05/29/21               | 06/01/21            |

# Risk Management Training Completion Tracking Tool

Staff Training Completion Tracking Tool

**Legend:**

|  |                   |
|--|-------------------|
|  | Required training |
|  | Optional training |

| Staff Name                                  | Staff ID Number | [Name of Training Program] |             |                | [Name of Training Program] |             |                | [Name of Training Program] |             |                | [Name of Training Program] |             |                | [Name of Training Program] |             |                |  |
|---|-----------------|----------------------------|-------------|----------------|----------------------------|-------------|----------------|----------------------------|-------------|----------------|----------------------------|-------------|----------------|----------------------------|-------------|----------------|--|
|   |                 | Date Completed             | CEUs Earned | Retraining Due | Date Completed             | CEUs Earned | Retraining Due | Date Completed             | CEUs Earned | Retraining Due | Date Completed             | CEUs Earned | Retraining Due | Date Completed             | CEUs Earned | Retraining Due |  |
| <b>Clinical Providers (Family Practice)</b> |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| Great Provider, MD                          |                 | 5/2/2015                   | 1           | 5/2/2018       |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| Tracy Practitioner, CRNP                    |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| <b>Nursing</b>                              |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| Pat Smith, RN                               |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| Maria White, LPN                            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| <b>Administration</b>                       |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| <b>Behavioral Health</b>                    |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| <b>Dental</b>                               |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |
| [Staff member name, designation]            |                 |                            |             |                |                            |             |                |                            |             |                |                            |             |                |                            |             |                |  |

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# Oversight of the Risk Management Training Plan (Slide 1 of 2)



- The staff member ultimately responsible for developing and carrying out the health center's risk management training plan may vary from facility to facility, and may include but not be limited to:
  - Risk Manager
  - Education Manager
  - Executive Director/Chief Executive Officer (CEO)
  - Chief Medical Officer
  - Other



# Oversight of the Risk Management Training Plan (Slide 2 of 2)

- The governing board reviews and approves the risk management training plan. (If not, the health center will specify who reviews and approves the plan.)



# Risk Management Training Resources (Slide 1 of 4)



# Risk Management Training Resources (Slide 2 of 4)

- HRSA – Health Resources and Services Administration
  - FTCA Application Demonstration of Compliance Tool: Risk Management Training Plan Edition <https://bphc.hrsa.gov/ftca/riskmanagement/index.html>
  - Program Assistance Letter (PAL): Calendar Year 2022 Requirements for Federal Tort Claims Act (FTCA) Coverage for Health Centers and Their Covered Individuals <https://bphc.hrsa.gov/sites/default/files/bphc/ftca/pdf/pal-2021-01.pdf>

## Risk Management Training Resources (Slide 3 of 4)

To support health center and free clinics HRSA provides FREE access to the ECRI Institute Clinical Risk Management Program, and every staff member may have their own account.

# Risk Management Training Resources (Slide 4 of 4)

- ECRI: Risk Management Toolkit → Risk Management Training
- ECRI: Education and Training Tools
- ECRI: Obstetrics Training Suite
- ECRI: Toolkits – Culture of Safety, Event Reporting, Infection Control
- ECRI: Staff Training and Development Toolkit (Published 09/23/21)  
<https://www.ecri.org>

# ECRI Risk Management Toolkit: Risk Management Training

- E-Learning Catalogue of Free Risk Management Courses for CME/CNE
- Recommendations for Risk Management Training for All Staff
- Staff Training Completion Tracking Tool
- FTCA Application Demonstration of Compliance Tool: Risk Management Training Plan Edition
- Policy and Procedure Builder: Risk Management Training Plan
- Get Safe: Developing a Risk Management Training Program

# Risk Management Training Resources

- ACOG – American College of Obstetricians and Gynecologists <https://www.acog.org>
- AHRQ – Agency for Healthcare Research and Quality <https://www.ahrq.gov>
- American Academy of Family Physicians <https://www.aafp.org>
- ADA – American Dental Association <https://www.ada.org>
- AMA – American Medical Association <https://www.ama-assn.org>
- ASHRM – American Society for Health Care Risk Management <https://www.ashrm.org>
- Centers for Disease Control and Prevention <https://www.cdc.gov>
- NACHC – National Associations of Community Health Centers <https://www.nachc.org>

# Key Takeaways:

- Management of risk within the healthcare organization is everyone's responsibility.
- Risk management training is critical to improve safety and mitigate risk, and part of a successful risk management and patient safety program.
- Topics for risk management training must meet the minimum requirements for deeming, as well as include the identified areas/activities of highest risk within the health center as identified through various risk management activities.
- There are many resources available to assist with the development of a risk management training plan.



# References (Slide 1 of 2)

- HRSA Health Center Program – Risk Management and Quality Improvement  
<https://bphc.hrsa.gov/ftca/riskmanagement/index.html>
- HRSA Health Center Program Compliance Manual  
<https://bphc.hrsa.gov/programrequirements/compliancemanual/index.html>
- HRSA Health Center Program – Federal Tort Claims Act (FTCA)  
<https://bphc.hrsa.gov/ftca/index.html>
- HRSA FTCA Application Demonstration of Compliance Tool: Risk Management Training Plan Edition  
<https://bphc.hrsa.gov/sites/default/files/bphc/ftca/healthcenters/ftca-compliance-tool-risk-management-training-plan.pdf>    ECRI – Risk Management Toolkit  
<https://www.ecri.org/components/HRSA/Pages/RMToolkit.aspx>
- ECRI – Risk Management Manual for Health Centers  
<https://www.ecri.org/components/HRSA/Documents/RiskManagementManual.Pdf>

# References (Slide 2 of 2)

- ECRI – Recommendations for Risk Management Training for All Staff  
<https://www.ecri.org/components/HRSA/Pages/RMToolkit.aspx>
- ECRI – Get Safe! Developing a Risk Management Training Program  
[https://www.ecri.org/components/HRSA/Pages/GetSafe\\_042815.aspx](https://www.ecri.org/components/HRSA/Pages/GetSafe_042815.aspx)
- ECRI – Staff Training Completion Tracking Tool  
<https://www.ecri.org/components/HRSA/Pages/RMToolkit.aspx>
- ECRI – Policy and Procedure Builder: Risk Management Training Plan  
<https://www.ecri.org/components/HRSA/Pages/RMToolkit.aspx>
- ECRI – Risk Management Training: Requirements, Resources, and Strategies (webinar)  
[https://www.ecri.org/components/HRSA/Pages/HRSAWebinar\\_041420\\_RMTraining.aspx](https://www.ecri.org/components/HRSA/Pages/HRSAWebinar_041420_RMTraining.aspx)
- ECRI – Hiding in Plain Sight: Free Resources for Risk Management Training (webinar)  
[https://www.ecri.org/components/HRSA/Pages/HRSAWebinar\\_041321\\_Hiding.aspx](https://www.ecri.org/components/HRSA/Pages/HRSAWebinar_041321_Hiding.aspx)

## Polling Question #5

# Final Reminders

- Please send an email to [hrsaftcadeeming@kepro.com](mailto:hrsaftcadeeming@kepro.com) to request a post webinar survey and obtain a Certificate of Completion.
  - Include “survey” and “Certificate of Completion” in the subject line of the email.
- After a post webinar survey is submitted, a Certificate of Completion will be sent via email from [svc\\_powerplatform@kepro.com](mailto:svc_powerplatform@kepro.com).
- You must complete a post webinar survey to receive a Certificate of Completion.
- The post webinar survey will be closed on 09/30/22.
- After the survey closes, Certificates of Completion will not be issued.

# Questions



- Contact [hrsaftcadeeming@kepro.com](mailto:hrsaftcadeeming@kepro.com) if you have questions about the webinar.

**Thank You!**