

Self-assessment Checklist: Enterprise Risk Management

This resource is designed to help evaluate customary risk control policies and procedures. For additional risk control tools and information on a wide and evolving range of topics, visit www.cna.com.

| Risk Control Measures | Present? Yes/No | Comments |
|---|--------------------|----------|
| Strategic Risk | | |
| Promotional/marketing materials (e.g. advertisements, brochures, websites, telephone directory listings) are reviewed to ensure that they do not include contain inappropriate language or inaccurate descriptions, and convey no unreasonable expectations. | | |
| The organization has a formal risk management plan that: | | |
| • Declares the organization’s risk control goals. | | |
| • Describes the scope, components and methods of the risk control program. | | |
| • Delegates responsibilities for implementation and enforcement. | | |
| • Demonstrates leadership commitment. | | |
| • Mandates confidentiality and immunity from retaliation for staff members who report sensitive information. | | |
| Human Capital Risk | | |
| A pre-employment screening process is created and implemented that includes the following documented elements: | | |
| • Drug screen. | | |
| • Background investigation, which includes criminal record, Office of Inspector General (OIG) and sex abuse registries for all states where the applicant has lived or worked, as well as credit history, if relevant and legally permissible. | | |
| • Reference verification and documentation. | | |
| Every position has a written job description delineating specific responsibilities and required competencies. | | |
| All staff members undergo a formal office orientation program, which covers the following topics, among others: | | |
| • The practice’s mission and vision. | | |
| • Performance expectations and evaluation process. | | |
| • Equipment use and other basic operations. | | |
| • Appropriate professional appearance and behavior. | | |
| Employees read their job description and sign an acknowledgment. | | |
| Human resources policies and procedures are in writing, and are reviewed on a routine basis to ensure compliance with applicable federal, state and local legal requirements, such as: | | |
| • Americans with Disabilities Act (ADA) requirements. | | |
| • HIPAA privacy regulations. | | |
| • Equal Employment Opportunity Commission (EEOC) and other anti-discrimination laws. | | |

Present?

Yes/No

Comments

Risk Control Measures

Clinical Risk

Formal written policies and procedures exist, addressing the following clinical issues, among others:

- Medication management.
- Hand-off communication.
- Patient identification.
- Time-out procedures.
- Infection prevention.
- Disclosure of unanticipated outcomes.
- Medical device safety.
- Fall prevention and mitigation.
- Informed consent and refusal.
- Patient scheduling and after-hours care.
- Proper professional boundaries.
- Test result management.
- Referral processes for patients requiring a specialist.
- Drug and medical device recall.

A written, individualized plan of care is developed for each patient and updated as necessary.

Staff members participate in annual programs on patient safety, as well as risk management, customer and community relations, confidentiality and compliance.

Operational Risk

There is a designated risk manager on staff, with well-delineated responsibilities.

A system is in place for identifying and tracking medication errors and other untoward incidents.

A system has been implemented for identifying and tracking quality issues and patient complaints.

Administrative, operational and disaster preparedness practices are governed by written policies and procedures, which are approved by leadership and shared with all physicians and staff.

Staff are trained in telephone etiquette, which includes dealing with angry or dissatisfied patients in a tactful, respectful and non-confrontational manner.

A designated staff member responds to complaints from patients, family members and visitors.

The risk manager is promptly notified of all complaints from patients, family members or visitors.

All communication regarding patient complaints is reviewed by the risk manager and documented in case of later legal or regulatory action.

Present?

Yes/No

Comments

Risk Control Measures

Technology Risk

Formal written policies and procedures exist and implemented regarding the following areas, among others:

- Healthcare record management.
- Confidentiality and release of medical information.
- Maintenance of the healthcare record, including release authorization, retention time and storage security measures.
- Social media.
- Faxing of confidential information.
- Electronic health records.
- Use of electronic media.
- Administration of cybersecurity.
- Use of telehealth.

Legal/Regulatory Risk

Written, regularly reviewed policies and procedures address the following areas, among others:

- Process for handling and taking action on legal and regulatory notices.
- Process for notification of insurance carrier.
- Process for mandatory and voluntary external reporting of adverse events and near misses.
- HIPAA-related patient confidentiality practices and notifications.
- Billing regulations, both federal and state.
- Clinical Laboratory Improvements Act (CLIA) regulations.
- Contractual agreements containing hold harmless and/or indemnification clauses.
- Termination of the patient-provider relationship.

Present?

Yes/No

Comments

Risk Control Measures

Financial Risk

| | | |
|--|--|--|
| Legal contracts are reviewed by legal counsel and other authorized parties prior to execution , then reviewed and renewed annually. | | |
| The following contractual and financial areas, among others, are governed by written policies: | | |
| • Insurance denials. | | |
| • Patient billing and collections. | | |
| • Medicare/Medicaid billing. | | |
| • Managing payments and accounts. | | |

Hazards

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| A hazard vulnerability assessment has been conducted. | | |
| Disaster planning includes identification of back-up resources in the event of a major service disruption. | | |
| An emergency response plan has been developed that outlines the necessary steps to be taken and the responsibilities of the individuals involved. | | |

This tool serves as a reference for organizations seeking to evaluate enterprise-wide risk exposures. The content is not intended to represent a comprehensive listing of all actions needed to address the subject matter, but rather is a means of initiating internal discussion and self-examination. Your organization and risks may be different from those addressed herein, and you may wish to modify the activities and questions noted herein to suit your individual organizational practice and patient needs. The information contained herein is not intended to establish any standard of care, or address the circumstances of any specific healthcare organization. It is not intended to serve as legal advice appropriate for any particular factual situations, or to provide an acknowledgement that any given factual situation is covered under any CNA insurance policy. The material presented is not intended to constitute a binding contract. These statements do not constitute a risk management directive from CNA. No organization or individual should act upon this information without appropriate professional advice, including advice of legal counsel, given after a thorough examination of the individual situation, encompassing a review of relevant facts, laws and regulations. CNA assumes no responsibility for the consequences of the use or nonuse of this information.