

# Children's of Alabama Compliance Corner

## **Potential Termination of the Centers for Medicare and Medicaid Services (CMS) Provider Agreement with Brookwood Baptist Medical Center**

Recently, Brookwood Baptist hospital experienced the possibility of losing their Medicare/Medicaid income due to failure to follow the CMS's Condition of Participation: Patient Rights. To learn more about this case, we interviewed Children's Regulatory Compliance and Accreditation Coordinator, Sara Bryant.

### **Sara, what led up to the potential termination of Brookwood Baptist's CMS provider agreement?**

A patient in Behavioral Health (BH) was in a safe room (seclusion) and the patient's behavior escalated, which warranted staff to physically restrain him. Unfortunately, during the course of physically restraining the patient, the patient vomited, aspirated, coded, and expired. This event triggered a CMS investigation, which led to re-education of all BH staff on de-escalating interventions and how to properly restrain patients.

### **What can our employees learn from this experience?**

Employees need to

- Know proper education and training on behavior de-escalation techniques and restraints for violent and non-violent patients
- Review and adhere to policies and procedures\* regarding restraints and seclusion
- Properly document all details of restraint and seclusion events

Children's currently has a Restraint Committee, which monitors all restraint episodes for performance improvement opportunities.

\*Reference – *Restraint and Seclusion Policy* in Lucidoc