


<p>GOVERNMENT OF THE DISTRICT OF COLUMBIA</p>  <p><b>DEPARTMENT OF BEHAVIORAL HEALTH</b></p>	<p><b>Policy No.</b> 662.1A</p>	<p><b>Date</b> 11/07/2024</p>	<p><b>Page 1</b> TL-344</p>
	<p><b>Supersedes:</b> DBH Policy 662.1, same subject, dated August 31, 2015.</p>		

**Subject: Major Investigations Policy**

1. **Purpose.** This policy outlines the Department of Behavioral Health (DBH) Division of Incident and Major Investigations (DIMI) process for conducting major investigations to identify the cause(s) of incidents and to eliminate conditions that may contribute to the recurrence of similar events. This policy also establishes responsibilities and procedures for DBH and DBH licensed or certified providers to cooperate in major investigations.

2. **Applicability.** DBH, DBH licensed or certified providers with a human care agreement, providers that deliver care pursuant to D.C. Code § 21-521 under contract with DBH and St. Elizabeths Hospital (SEH).

3. **Authority.** Department of Behavioral Health Establishment Act of 2013, D.C. Code §§ 7-1141.01 *et seq.*

4. **Policy.**

4a. DIMI shall investigate, pursuant to this policy and in accordance with applicable laws and regulations, any incident identified in Section 2 that involves the following:

(1) Consumer/client/Individual in Care (IIC) deaths, including:

- a. Suspected suicides;
- b. Unexpected consumer/client/IIC deaths; and
- c. Deaths of consumer/client/IIC under age twenty-two (22).

(2) Suspected exploitation, neglect, physical and sexual abuse of a consumer/client;

(3) Suspected violence or sexual harassment of a consumer/client/IIC;

(4) Illegal substances or weapons found on DBH or provider premises; and

(5) Any other issue referred by the Director of DBH or the Deputy Director of Data, Quality and Compliance (DQC).

4b. SEH shall investigate all other incidents related to the treatment and care of IIC at SEH pursuant to SEH Policy 302.02, or any successor policy.

4c. All personnel of entities identified in Section 2 must fully and timely cooperate with all major investigations in accordance with the procedures outlined below.

## 5. Procedures.

5a. Complaint Submission. All personnel of entities identified in Section 2 shall report any event listed in Section 4a in accordance with DBH Policy 480.1B: Reporting Major Unusual Incidents (MUIs) and Unusual Incidents (UIs), or any successor policy.

### 5b. Major Investigation Process.

(1) DIMI shall review all MUIs and UIs to determine if they require a major investigation pursuant to Section 4a. If DIMI determines that a major investigation is warranted, DIMI shall timely notify all known involved parties, if needed.

(2) DIMI shall gather all necessary information to conduct and complete a full investigation of the incident, including but not limited to:

- a. Interviewing and obtaining written statements from all relevant parties;
- b. Collecting and reviewing all relevant records, such as policies, employee records, medical documents, surveillance footage and police reports; and
- c. Visiting the site where the alleged incident occurred and taking photographs.

DIMI shall provide all involved parties with a deadline to provide any requested evidential materials or information. Parties may submit a written request to DIMI for an extension of this deadline at least one (1) business day before the deadline expires stating the reason(s) that the party requires additional time to provide materials and information to DIMI. Upon good cause, DIMI may grant a deadline extension.

(3) DIMI shall complete the investigation within sixty (60) business days of receipt of the MUI or UI. The Deputy Director of DQC may extend these deadlines for good cause.

(4) The Director of DIMI shall prepare and sign the final Incident Investigation Report. The Incident Investigation Report shall include:

- a. A list of the individuals on the investigation team;
- b. Description of the reported incident;
- c. Investigative questions;
- d. Evidence reviewed;
- e. Interviews conducted;
- f. Investigatory questions dispositions (i.e., Substantiated, Unsubstantiated, Inconclusive); and
- g. Remedial actions/recommendations.

(5) The Director of DIMI shall submit the final Incident Investigation Report to the:

- a. DBH Director;
- b. General Counsel;

- c. Executive staff members as determined by the DBH Director; and
- d. Any other individuals or entities as determined by the DBH Director.

All Incident Investigation Reports are confidential. Any request for access to the final Incident Investigation Report shall be forwarded to the DBH Office of the General Counsel to be processed in accordance with the [District of Columbia Freedom of Information Act](#).

- (6) DIMI shall provide the conclusion of the Incident Investigation Report, along with any recommendations for remedial actions, to the provider within five (5) business days of submission of the final Incident Investigation Report pursuant to Section 5b.5.
- (7) Providers must respond within thirty (30) business days of receiving DIMI's recommendations for remedial actions, indicating which recommendations they will implement and providing justifications for any they choose not to adopt.

5c. Monitoring and Analysis. DIMI shall send any remedial actions/recommendations to a designated staff member to monitor provider implementation for up to twelve (12) months or as specified in the Incident Investigation Report. DQC shall review and analyze findings of major investigation reports on an annual basis to identify trends and opportunities for improvement.

5d. Sanctions for Non-Compliance. If the incident involves a violation of certification regulations or human care agreements, DBH may take adverse action, up to and including decertification or contract termination.

## 6. Definitions.

6a. Major Investigation. The detailed inquiry or systematic examination of types of incidents listed in Section 4a.

6b. DIMI. The Division within DBH DQC that is responsible for receiving MUI, UI and mortality review reports, and conducting investigations.

## 7. Related DBH Policies.

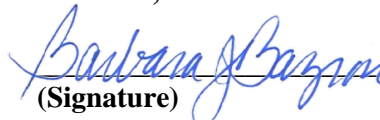
DBH Policy 480.1B Reporting MUIs and UIs

DBH Policy 482.1 DBH Policy on Protecting Consumers from Abuse, Neglect or Exploitation

DBH Policy 115.1 Mortality Reviews

**Approved By:**

**Barbara J. Bazron, Ph.D.**  
**Director, DBH**

  
(Signature) 11/07/24  
(Date)