

Main components of an abuse, neglect, and exploitation prevention program.

According to the Centers for Disease Control and Prevention, one in ten elders and one in seven children have experienced abuse and/or neglect in the past year.



Every individual receiving human services has a right to a safe environment which enriches their lives. One pitfall to achievement of this goal is the potential for Abuse, Neglect, & Exploitation (ANE) with vulnerable individuals. Implementing a strong Abuse, Neglect, & Exploitation Prevention and Detection Program is a critical step for every health and human services provider.

This starts with clearly defined written policies, includes thorough screening protocols enacted by the provider, and followed by thorough and consistent staff training for all key roles (persons served, company leadership, caregivers, custodial roles, mandated reporters, trainers, assigned investigators). These critical pieces are followed by monitoring processes, reporting procedures, incident investigations by assigned personnel, and response / resolution of any incident.

This high-level overview addresses (the framework for) an effective Abuse, Neglect, and Exploitation prevention and detection program. Every human services provider must develop and implement their own specific policies that ensure a safe place for the persons served and complies with all state and federal statutory requirements.

See the following pages for practical steps your business can take.

Human Services: Abuse, Neglect, and Exploitation

Written policies, screening protocols, and staff training are three critical components that must be established by health and human service providers. These foundational pieces provide the structure for abuse, neglect, and exploitation prevention and detection programs.

Health and human service program leadership must provide support and oversight for all prevention and reporting components

Written Policy	Screening	Staff Training
<p>Formal framework for all other components (screening protocols, training, reporting procedures, investigations, and response</p> <p>Reviewed and supported by provider leadership</p> <p>Outlines training requirements for prevention and signs of ANE</p> <p>Establishes reporting, investigation and resolution procedures</p> <p>Identifies responsible parties</p> <p>Incident File / Report Retention</p> <p>Complies with regulatory and statutory guidelines</p> <p>Reviewed by assigned and authorized personnel at regular intervals to maintain up-to-date procedures. Policy updates made when necessary</p> <p>Reviewed by legal counsel</p>	<p>Persons served:</p> <ul style="list-style-type: none"> ■ Pre-admission screenings <p>Staff:</p> <ul style="list-style-type: none"> ■ Pre-employment background screenings, reference checks and verification ■ Verify education, licenses and certifications <p>Volunteers:</p> <ul style="list-style-type: none"> ■ Background screenings <p>Vetting of 3rd party contractors and / or outside parties (always verify who is on site)</p>	<p>Provides staff overview of ANE prevention and reporting program</p> <p>Initial hire and annual in line with internal written policy</p> <p>Training includes:</p> <ul style="list-style-type: none"> ■ ANE indicators and symptoms ■ Internal reporting procedures ■ Reporting and resolution timelines ■ Challenging behaviors and interventions ■ Additional training and staff retraining per written policy <p>Training per internal agency / provider written policies for assigned program roles (varies per assigned position)</p>

Human Services: Abuse, Neglect, and Exploitation

Monitoring / identifying protocols, reporting procedures, and investigations provide continued oversight by health and human service providers to ensure prevention and detection of potential abuse, neglect, and exploitation per written policies.

Monitor / Identify	Report	Investigate
<p>Safety and / or vulnerability assessments</p> <p>Tracking for history of trends - if potential is identified, take action per internal policy</p> <p>Indicators or symptoms</p> <ul style="list-style-type: none"> ■ Unusual patterns ■ Suspicious or unexplained injuries (e.g. bruising) ■ Inconsistent staff explanations ■ Unusual resident behaviors around certain staff <p>Once notified and / or identified: report to proper authority in line with internal written policies</p>	<p>Reports made to proper authority (internal) per written company reporting policy and procedure</p> <p>Triage of Potential Incident(s)</p> <ul style="list-style-type: none"> ■ Internal resolution and / or external reporting completed per written policy (assigned personnel review evidence, notes, observed incident reports or third-party reporting, witnesses, pattern, etc.) ■ Assessment of the incident (i.e. trauma, exploitation of persons served, injury, hospitalization, death) <p>Assigned personnel determine if there are indicators or absence of ANE in the incident based on assessment, leading to either further investigation or resolution per written policy</p>	<p>Prompt and thorough (within internal provider policy)</p> <p>External reporting per statutory and / or funding agency (Medicaid, CPS, etc.) requirements</p> <p>Assigned investigator</p> <p>Root cause investigation / analysis</p> <p>Assessment to determine if abuse, neglect, or exploitation claim is substantiated or unsubstantiated</p> <p>Resolution per written policy</p>

Potential indicators of Abuse, Neglect, or Exploitation include unusual patterns, suspicious or unexplained injuries, inconsistent staff explanations, and / or unusual resident behavior around certain staff

Human Services: Abuse, Neglect, and Exploitation

Timely response by health and human service providers is critical in order to protect person(s) served and determine proper course of action.

Response

Prompt response to protect and care for person(s) served and corrective measures in line with internal written policies

Inquiries

Identify need for policy review, staff retraining, staff termination per written policy and staff review and/or change to screening procedures

Additional safety and / or vulnerability assessments

Interdisciplinary Team interventions

Address with Quality Assurance & Performance Improvement programs

Additional measures as necessary to protect person(s) served and prevent recurrence

Incident report retention per written policy and in line with statutory requirements

Tools with additional information on Abuse, Neglect, and Exploitation

Nationwide Loss Control Services offers additional documents to assist with your ANE assessment. Look for our [Abuse, Neglect, and Exploitation Flow Chart \(CMO-1139AO\)](#) and [Sexual Abuse and Molestation Prevention Checklist \(CMO-0421AO\)](#) on MyLossControlServices.com.



This information is meant to provide additional insight in the development of abuse, neglect, and exploitation prevention and detection protocols. Every specialty care program must stay diligent in their efforts. Our exclusive Otherfirst program provides a wide range of basic and optional coverages to help meet the needs of your industry. Specialized coverages and endorsements including Abuse or Molestation coverage are available. Visit [Nationwide Specialty Care Services](#) for more information.

Information in this bulletin is based on the prescribed guidelines of the following:
[Centers for Medicare and Medicaid Services \(CMS\); 1915\(c\) Instructions, Technical Guide, and Review Criteria \[Version 3.6, January 2019\]](#)
[Centers of Disease Control and Prevention \(CDC\); Violence Prevention](#)

Providing solutions to help our members manage risk.®

Resources:

Understanding Elder Abuse Fact Sheet, The Center for Disease Control and Prevention <https://www.cdc.gov/violenceprevention/pdf/em-factsheet-a.pdf>

Preventing Child Abuse Fact Sheet, The Center for Disease Control and Prevention <https://www.cdc.gov/violenceprevention/pdf/CAN-factsheet.pdf>

For your risk management and safety needs, contact Nationwide Loss Control Services: 1-866-808-2101 or LCS@nationwide.com.