

# R<sup>3</sup> Report | Requirement, Rationale, Reference

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Published for Joint Commission-accredited organizations and interested health care professionals, *R3 Report* provides the rationale and references that The Joint Commission employs in the development of new requirements. While the standards manuals also may provide a rationale, *R3 Report* goes into more depth, providing a rationale statement for each element of performance (EP). The references provide the evidence that supports the requirement. *R3 Report* may be reproduced if credited to The Joint Commission. Sign up for [email](#) delivery.

## Workplace Violence Prevention in Behavioral Health Care and Human Services

Effective July 1, 2024, three new and one revised workplace violence prevention requirements will apply to all Joint Commission-accredited behavioral health care and human services (BHC) organizations. Similar requirements for hospitals and critical access hospitals took effect January 1, 2022.

Prevalence of workplace violence in BHC settings is high (Hawkins, 2022; Liu, 2019; Longton, 2015; Bride, 2015) and has increased in recent years (Zhang, 2023). Workplace violence contributes to burnout and staffing shortages in health care, which further exacerbates the crisis in mental health among behavioral health workers (Yeh, 2020; Kim, 2023; Liu, 2019).

The new and revised Joint Commission requirements provide a framework to guide BHC organizations in developing new and reinforcing existing workplace violence prevention efforts. Requirements focus on leadership oversight, policies and procedures, reporting systems, data collection and analysis, post incident support and follow-up, and staff training and education as means to decrease workplace violence.

Along with the new requirements, *the Comprehensive Accreditation Manual for Behavioral Health Care and Human Services (CAMBHC)* Glossary now includes a definition of workplace violence: “An act or threat occurring at the workplace that can include any of the following: verbal, nonverbal, written, or physical aggression; threatening, intimidating, harassing, or humiliating words or actions; bullying; sabotage; sexual harassment; physical assaults; or other behaviors of concern involving staff, licensed practitioners, patients, or visitors.”

### Engagement with stakeholders, customers, and experts

In addition to an extensive literature review and public field review, The Joint Commission sought expert guidance from a [Technical Advisory Panel \(TAP\)](#) of representatives from behavioral health care organizations, academic organizations, professional associations, and health care and government sectors.

To ensure that the new and revised Joint Commission elements of performance (EPs) are supported by consensus opinion from multidisciplinary experts and stakeholders, we asked the TAP to take part in a modified Delphi voting process. The Delphi technique involves multiple rounds of voting and ensures that the voices and viewpoints from all the experts and stakeholders participating in the process are included when examining a topic. The Delphi process is a simple and well-recognized consensus building method (Shang, 2023; Nasa, 2021). Our modified Delphi voting process involved two rounds of voting (one via questionnaire and one during a virtual meeting), with discussion among participants conducted between the two rounds. The final vote occurred during the TAP meeting held in September 2023 to decide whether the proposed EP should move forward as a requirement. The new EPs were individually reviewed. After brief discussion, TAP member voting resulted in 100% consensus on including these EPs in the BHC accreditation requirements.

## Requirement

**Standard EC.02.01.01:** The organization manages safety and security risks.

**EP 17:** The organization conducts an annual worksite analysis related to its workplace violence prevention program. The organization takes actions to mitigate or resolve the workplace violence safety and security risks based upon findings from the analysis.

Note: A worksite analysis includes a proactive analysis of the worksite, an investigation of the organization's workplace violence incidents, and an analysis of how the program's policies and procedures, training, education, and environmental design reflect best practices and conform to applicable laws and regulations.

## Rationale

Evaluating the effectiveness of a workplace violence prevention program requires a worksite analysis. Organizations then must implement environmental modifications based on findings from the analysis. With best practices and applicable laws and regulations constantly evolving, organizations must also review their incident report data, the outcomes of investigations, program policies and procedures, training, and education for consistency with the latest recommendations.

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  - Section 3a: Healthcare Workplace Violence Gap Analysis Tool
  - Tools available at <https://oregonhospitals.org/safety/>

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## Requirement

**Standard EC.04.01.01:** The organization collects information to monitor conditions in the environment.

**EP 1:** The organization develops and implements a process(es) for continually monitoring, internally reporting, and investigating the following:

- Problems and incidents related to each of the environment of care management plans
- Injuries to individuals served or others within the organization's facilities
- Occupational illnesses and staff injuries

Note: This requirement applies to issues in the workplace, such as back injuries or allergies. It does not apply to communicable diseases.

- Incidents of damage to its property or the property of others in locations it controls
- Safety and security incidents involving individuals served, staff, or others in locations it controls, including those related to workplace violence
- Fire safety management problems, deficiencies, and failures

Note 1: All the incidents and issues listed above may be reported to staff in quality assessment, improvement, or other functions as well as to the designated leader of the workplace violence reduction effort. A summary of such incidents may also be shared with the person designated to coordinate safety management activities.

Note 2: Review of incident reports often requires that legal processes be followed to preserve confidentiality. Opportunities to improve care, treatment, or services, or to prevent similar incidents, are not lost as a result of following the legal process.

## Rationale

Establishing a process to collect data by monitoring, reporting, and investigating workplace violence incidents allows the organization to identify risk factors in vulnerable areas and implement environmental controls, education, and other mitigation strategies. Ongoing data collection can identify trends, patterns, and gaps in the program and can evaluate the effectiveness of the program.

Underreporting of workplace violence incidents can be a major problem. As more organizations adopt standard processes for collecting and reporting data on workplace violence incidents, it will be possible to benchmark the performance of workplace violence prevention programs so BHC organizations can judge the effectiveness of their program and make modifications to further reduce incidents.

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## Requirement

**Standard HRM.01.05.01:** Staff participate in education and training.

**EP 17:** As part of its workplace violence prevention program, the organization provides training, education, and resources (at time of hire, annually, and whenever changes occur regarding the workplace violence prevention program) to leadership, staff, and licensed practitioners. The organization determines what aspects of training are appropriate for individuals based on their roles and responsibilities. The training, education, and resources address prevention, recognition, response, and reporting of workplace violence as follows:

- What constitutes workplace violence
- Education on the roles and responsibilities of leadership, clinical staff, security personnel, and external law enforcement
- Training in de-escalation, nonphysical intervention skills, physical intervention techniques, and response to emergency incidents
- The reporting process for workplace violence incidents

## Rationale

Recognition of what constitutes workplace violence begins with awareness of the different types of physical and nonphysical acts and threats that are occurring in the workplace. In addition, education and training should focus on de-escalation and intervention techniques when confronted with incidents of workplace violence. Incorporating violence prevention tools and encouraging the use of a simple and accessible reporting process can ultimately reduce the likelihood of staff being victims of workplace violence.

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  - Section 6: Education and Training
  - Section 5g: Behavioral Health Rapid Response Teams (New Tool)
  - Section 5h: De-escalation Techniques (New Tool)
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## Requirement

**Standard LD.03.01.01:** Leaders create and maintain a culture of safety and quality throughout the organization.

**EP 9:** The organization has a workplace violence prevention program led by a designated individual and developed by a multidisciplinary team that includes the following:

- Policies and procedures to prevent and respond to workplace violence
- A process to report incidents, and to analyze incidents and trends
- A process for follow-up and support for victims and witnesses affected by workplace violence, including trauma and psychological counseling, if necessary
- Reporting of workplace violence incidents to governance

## Rationale

Identifying an individual to lead an organization's workplace violence prevention program establishes clear lines of accountability. In addition, having policies and a standardized process to report and follow up on events or near-misses decreases variation in the program. Underreporting may be greater in BHC as often clients are being treated for conditions that include violent behaviors. Staff in these settings may not recognize the need to report incidents in this population as it is considered part of the job. Regardless of intention, it is important to report all instances of violence without judgement. Data collection and simple, accessible reporting structures show organization commitment to providing a safe and secure work environment and encourage staff to report incidents. Regularly reporting incidents and trends to governance promotes transparency and further establishes accountability for the program.

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