



Innovation Track: A Comprehensive Critical Incident Management System— A Proposed Best Practice

August 28, 2019



TODAY'S DISCUSSION

- 1. Introduction to Speakers**
- 2. Overview of Critical Incidents**
- 3. A Brief History of Critical Incident Reporting for Medicaid HCBS**
- 4. Best Practice Guidance for a Comprehensive Incident Management System**

TODAY'S DISCUSSION

- 1. Introduction to Speakers**
- 2. Overview of Critical Incidents*
- 3. A Brief History of Critical Incident Reporting for Medicaid HCBS*
- 4. Best Practice Guidance for a Comprehensive Incident Management System*

INTRODUCTION OF SPEAKERS

- **Dr. Jay Bulot**

Vice President for State Markets
WellSky Corporation

- **Dustin Schmidt**

Associate Director
Navigant

- **Brian Bennett**

Medicaid Section Chief
Louisiana Department of Health

- **Melissa Ledoux**

Quality Assurance Manager
Louisiana Department of Health

TODAY'S DISCUSSION

1. *Introduction to Speakers*
2. **Overview of Critical Incidents**
3. *A Brief History of Critical Incident Reporting for Medicaid HCBS*
4. *Best Practice Guidance for a Comprehensive Incident Management System*

CRITICAL INCIDENT DEFINITION

What is a Critical Incident?

- “Critical incidents” are situations that put the health, safety or welfare of participants at risk. Some states also use the term “adverse”, “serious” or “sentinel events”.
 - This may include medical (e.g., serious medication error, death, serious injury, etc.) and safety concerns (e.g., missing person, restrictive interventions, etc.).
- There is no standard federally defined term for “critical incident” that outlines the scope of reportable incidents, leading to variation across states ⁽¹⁾

(1) <https://www.hhs.gov/sites/default/files/cmcs-informational-bulletin-062818.pdf>

Common Critical Incident Types Tracked by State Medicaid Agencies:

- Abuse, Neglect, and Exploitation
- Unexpected Deaths
- Unexpected Hospitalization
- Serious Injury
- Criminal Activity/Legal Involvement
- Loss of Contact/Elopement
- Suicidal Behavior
- Medication Errors
- Use of Restraints/Seclusion

CMS REQUIREMENTS

- States operating HCBS waivers are required to provide assurances to CMS that necessary safeguards are in place to protect the health, safety, and welfare of participants receiving services. For critical incidents this includes:
 - The state must demonstrate on an ongoing basis that it **identifies, addresses and seeks to prevent instances of abuse, neglect, exploitation and unexplained death.**
 - The state must demonstrate that an **incident management system is in place** that effectively resolves those incidents and prevents further similar incidents to the extent possible.
- The state should:
 - Specify the **types of critical events** or incidents
 - **Identify individuals/entities that must report** critical incidents
 - **Define entity responsibilities**
 - Define **timeframes** for reporting and conducting/completing an investigation
 - Define **method(s) of reporting** (e.g., phone, written form, web-based report)
 - Define **notification requirements** (e.g., participants, guardian, etc.)

THE IMPORTANCE OF CRITICAL INCIDENT REPORTING AND DATA

- **Critical Incident Management not only protects the health and safety of the participants, it also provides data on the state and networks ability and effectiveness to address and mitigate incidents.**
- Incident data is used to:
 - Identify and resolve incidents to support waiver participant safety
 - Mitigate preventable incidents
 - Provide insights into trends and problems to reduce risks and improve quality of services
 - Demonstrate that the state has met or exceeded its waiver assurance performance measures

PARTIES INVOLVED IN CRITICAL INCIDENTS

Consumers and Other Parties



Participants / Family Members /
Neighbors / Friends / Guardian

Medicaid Waiver Providers



Direct Service Providers / Case
Managers / Support Brokers

State Agencies



1915(c)
Operating
Agency

Law
Enforcement

State
Medicaid
Agencies

Attorney
General

Office of
Inspector
General

Adult/Child
Protective
Services

Federal Agencies



Centers for
Medicare &
Medicaid
Services
(CMS)

Office of
Inspector
General

CMS DEFINITION OF AN INCIDENT MANAGEMENT SYSTEM

What is an Incident Management System? ⁽¹⁾

- Assures that reports of critical incidents are filed;
- Track that incidents are investigated in a timely fashion; and
- Analyze incident data and develop strategies to minimize preventable incidents.

Goals of a Robust System ⁽¹⁾

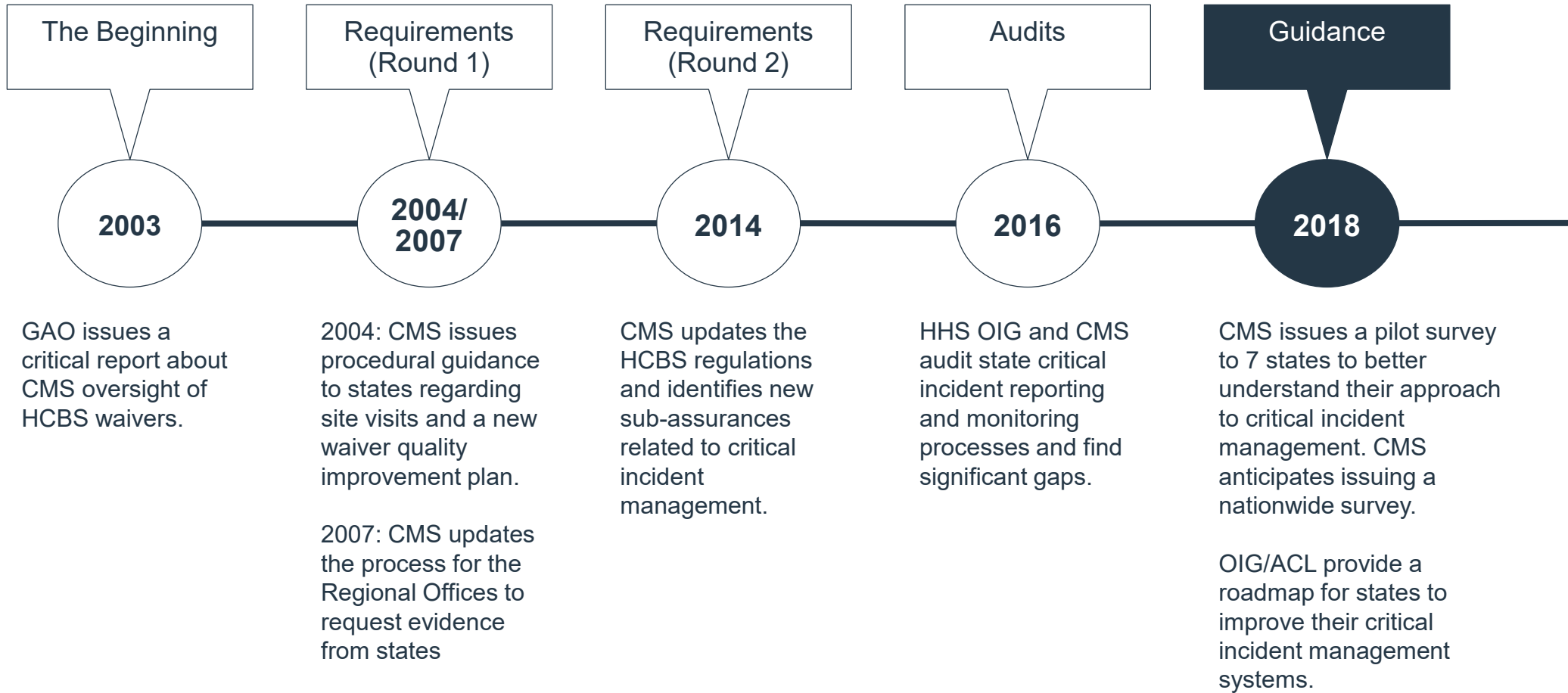
- Standardizes what incidents are and how incidents are collected.
- Provides guidelines for states in prioritizing what incidents need to be investigated and resolved.
- Allows states to identify, track, trend, mitigate and preventable incidents.

(1) http://www.nasuad.org/sites/nasuad/files/12%20-%20CMS_Managing_Incident_Mgmt_508.pdf

TODAY'S DISCUSSION

1. *Introduction to Speakers*
2. *Overview of Critical Incidents*
3. **A Brief History of Critical Incident Reporting for Medicaid HCBS**
4. *Best Practice Guidance for a Comprehensive Incident Management System*

PATH TO NATIONAL REFORMS FOR CRITICAL INCIDENT RESPONSE



PATH TO NATIONAL REFORMS FOR CRITICAL INCIDENT RESPONSE

Guidance

2019

GAO/ACL Joint Report: CMS continues to defer to the GAO/ACL report findings as a best practice. CMS does not mandate the adoption of these practices.

CMS Technical Assistance: CMS will create H&W Teams that will work with states during the next 3 years to proactively ameliorate H&W issues and provide technical assistance.

CMS Survey: CMS issued a statewide survey to states on July 13, 2019 to better understand how states approach critical incident management. Responses are due August 28, 2019.

Joint
Report



U.S. Department of Health and Human Services
Office of Inspector General,
Administration for Community Living, and
Office for Civil Rights

Ensuring Beneficiary Health and Safety in Group Homes Through State Implementation of Comprehensive Compliance Oversight

January 2018

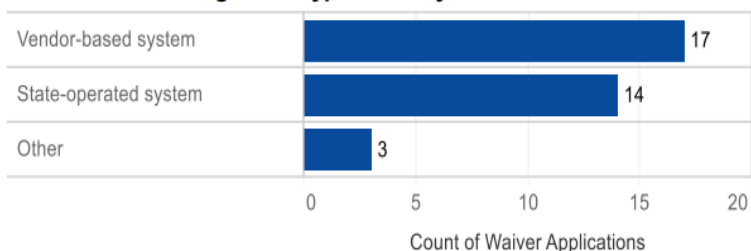


WHAT DID CMS LEARN FROM ITS 2018 CRITICAL INCIDENT SURVEY?

- States have utilized different approaches to developing and implementing their incident management systems ⁽¹⁾

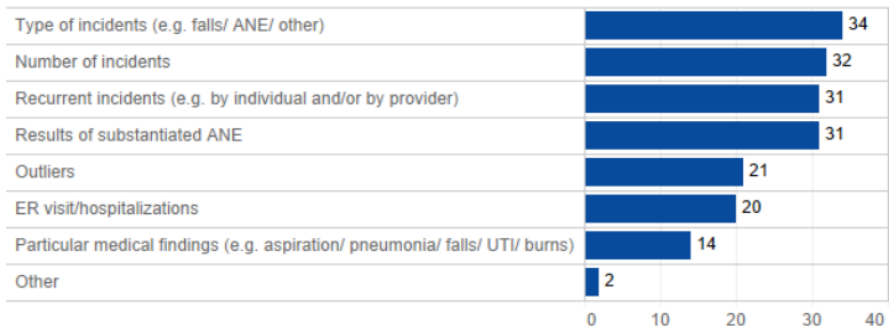
34 out of 38 waivers reported using an electronic system. Half of these waivers had a vendor-based system.

Figure 5: Type of IM System Used



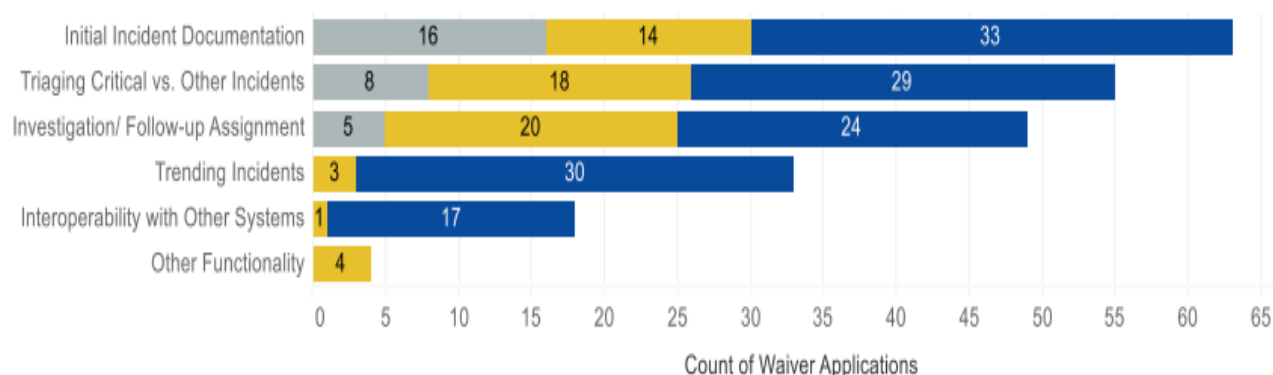
Survey results show that states create one or more of the following trend reports from incident data:

Figure 13: Types of Trend Reports Created*



- Most surveyed waivers record, triage, and trend incidents electronically, but interoperability is not a functionality available for most systems.

Figure 6: System Functionalities*



Answer
Electronic
Manual
Phone/Hotline

(1) http://www.nasuad.org/sites/nasuad/files/12%20-%20CMS_Managing_Incident_Mgmt_508.pdf

TODAY'S DISCUSSION

1. *Introduction to Speakers*
2. *Overview of Critical Incidents*
3. *A Brief History of Critical Incident Reporting for Medicaid HCBS*
4. **Best Practice Guidance for a Comprehensive Incident Management System**

FIVE RECOMMENDATIONS TO IMPROVE YOUR SYSTEM

1. Select critical incident types that are meaningful

2. Create clear policies regarding critical incident reporting requirements

3. Provide sufficient materials to support incident reporting

4. Create a single web-based system to track critical incidents

5. Track and analyze meaningful data points to minimize preventable incidents

RECOMMENDATION #1: SELECT CRITICAL INCIDENT TYPES THAT ARE MEANINGFUL

States should consider selecting critical incident types that 1) align with CMS requirements and 2) are important based on historical provider performance.

- Key factors to consider include:
 - Critical incidents types outlined by CMS, OIG, and state regulations
 - Provider history and incident trends across the state
 - Administrative burden on both providers to report on and state staff to manage
 - Critical incident types that the state does not want to collect (e.g., scheduled medical procedures/surgeries)

CMS AND OIG GUIDANCE REGARDING INCIDENT TYPES

CMS Requirements: 7 Incident Types: ⁽¹⁾

- Abuse (including physical, sexual, verbal and psychological abuse)
- Mistreatment or neglect
- Exploitation
- Serious injury
- Death other than by natural causes
- Other events that cause harm to an individual
- Events that serve as indicators of risk to participant health and welfare (e.g., hospitalizations, medication errors, use of restraints or behavioral interventions)

Additional Incident Types Recommended by OIG: 9 Incident Types: ⁽²⁾

- Events leading to adverse outcomes for participants due to staff misconduct / error
- Events resulting in injury or illness requiring medical treatment beyond first aid
- Choking incidents
- Hospital emergency room visits where the injury or the medical condition could indicate abuse or neglect
- Elopements whereby the individual is removed from staff supervision or placed at risk of serious harm
- Behavioral incidents that result in employee physical intervention, serious risk of harm, or property damage valued at more than \$150
- Emergency situations (e.g., fires, flooding, serious property damage)
- Criminal conduct by participants
- Incidents involving law enforcement

RECOMMENDATION #2: CREATE CLEAR POLICIES REGARDING CRITICAL INCIDENT REPORTING REQUIREMENTS

- If you need additional guidance on how to approach policy decisions, ask CMS!

Key Decision Points	Considerations
1. Does critical incident reporting apply to all incident events or only those that involve a paid Medicaid provider?	<p>State examples:</p> <ul style="list-style-type: none">• Pennsylvania: A Critical Incident is an unexpected and undesirable event that has an adverse impact on the outcome of care that occurs during a Member's term of care funded through PerformCare. CIR submission should occur to PerformCare only if PerformCare is funding the service.• Kentucky: Critical incidents are serious in nature and pose immediate risk to the health, safety, or welfare of waiver participants or others.
2. Who is responsible for investigating an incident?	<p>Federal OIG recommends:</p> <ul style="list-style-type: none">• The State should ensure independent State investigations of allegations of specified incidents (e.g., abuse and neglect that results in serious or repeated harm to participants; sexual abuse; unexpected deaths; incidents that result in life-threatening or serious injury or illness that appear to be due to provider misconduct/ANE or due to environmental hazards; etc.).• The State may delegate investigation for other incident situations to provider agencies or other entities.

RECOMMENDATION #2: CREATE CLEAR POLICIES REGARDING CRITICAL INCIDENT REPORTING REQUIREMENTS (CONTINUED)

Key Decision Points	Considerations
3. Who should be notified when a critical incident occurs?	<p>Kentucky's incident reporting instructional guide describes notification requirements for the following parties:</p> <ul style="list-style-type: none">• Law Enforcement (For incidents involving criminal activities)• Family Member: For adults, a family member is only notified if the waiver participant has provided consent via their PCSP. For children, a family member is always notified.• Medical Provider: The medical provider is notified for incidents involving medication errors or hospitalization.• Direct Service Provider• Case Manager or Support Broker• State or Private Guardian (If applicable and if specified in the PCSP)
4. Should the 1915(c) operating agency or APS investigate incidents involving abuse, neglect, or exploitation?	<p>CMS HCBS Technical Guidance: "...if the state's adult protective services (APS) agency has primary oversight responsibility for incident management, there should be processes whereby the APS agency regularly furnishes the Medicaid agency and/or operating agency with information about critical incidents that involve waiver participants and that the agencies work together to identify strategies to reduce the occurrence of critical incidents." ⁽¹⁾</p>

RECOMMENDATION #3: PROVIDE SUFFICIENT MATERIALS TO SUPPORT INCIDENT REPORTING

Materials Outlining State Requirements

SENTINEL EVENT POLICY	Effective Date: September 2010 Revised Date: February 2014 February 2017
Policy Number:	DHHS Policy: PR 10-01

I. Purpose

The Department of Health and Human Services' (DHHS) Sentinel Event Policy is part of a comprehensive quality assurance program with the Office of Quality Assurance and Improvement (OQAI). The Sentinel Event Policy establishes the reporting and review requirements of sentinel events involving individuals served by community providers and components of DHHS which provide sentinel events as directed by this policy.

II. Statutory Authority

In support of its commitment to quality in the delivery of health citizens of New Hampshire, the Department will review sentinel assurance activities. Statutory authority for reviews of sentinel 126-A:4, IV:

RSA 126-A:4 Department Established.

IV. The department may establish a quality assurance program.

- Any quality assurance program may consist of a comprehensive monitoring and evaluating the appropriateness of services provided by the department or any of its contract service providers so that problems are identified and steps to correct problems can be taken.
- Records of the department's quality assurance program including reviews or investigations, reports, statements, minutes, and other client medical records, shall be confidential and privileged and indirect discovery, subpoena, or admission into evidence in any except as provided in subparagraphs IV (c) or (d).
- In case of legal action brought by the department against a contract provider, the department's records may be discoverable.
- The department may refer any evidence of fraudulent or other quality assurance program to the appropriate law enforcement agency.
- No employees of the department or employees of a contract service provider shall be liable in any action for damages or other relief arising from the assurance program or in any judicial or administrative proceeding.

III. Goals

The goals of this sentinel event reporting and review policy are:

- To have a positive impact in improving care and service
- To understand the causes that underlie sentinel events, external systems and processes to reduce the probability

Kentucky 1915(c) HCBS Waivers: Critical Incident Reporting FAQs

Contents

Background	4
Questions and Answers	5
Section 1: General	5
Q1: Why does DHS need to track critical incidents?	5
Q2: What does DHS do with critical incident data?	5
Q3: What materials are available to support critical incident management?	5
Q4: When do I need to use the updated incident reporting materials?	5
Q5: Are "encrypted" emails required when submitting incident reports to the regulating agency?	6
Q6: When will DHS and waiver providers start using MWMA for incident reporting?	6
Q7: When DHS transitions to the web-based solution, do waiver providers need to continue to store electronic or paper copies of the incident reporting and investigation forms?	6
Q8: How should waiver providers submit and store the incident reporting and investigation forms?	6
Q9: What form should be used for reporting and investigation incidents for State General Fund (SGF) clients?	7
Section 2: Incident Reporting Process	8
Q10: How do I report a critical incident?	8
Q11: When do I need to notify or report an incident?	8
Q12: How should waiver participants be involved in the incident management process?	9
Q13: How does the case manager or support broker/service advisor receive a copy of the incident report if it is initially reported by another waiver provider?	10
Q14: If an incident happens or is discovered over the weekend what do I need to do?	10
Q15: If a critical incident is witnessed or discovered at 4:15pm ET, do I submit the Incident Reporting Form within the same day?	10
Q16: How do I report three or more non-critical incidents of the same incident type?	10
Q17: If a waiver participant has three non-critical incidents that occur at three different settings and has three different reporters, who is responsible for reporting the third incident as a critical incident?	11
Q18: If a waiver participant is taken to the emergency room, when do I need to report the incident to the regulating agency?	11
Q19: If my provider or case management agency completes investigations using a different form, can we continue to use this document?	11
Q20: As a parent and representative of a waiver participant, what do I do if I suspect someone I hired is abusing my child?	11

Forms / Reports for Reporting Purposes

Program: <input type="checkbox"/> ABI <input type="checkbox"/> ABI-LTC <input type="checkbox"/> HCB <input type="checkbox"/> MHV <input type="checkbox"/> MPW <input type="checkbox"/> SCL Participant Directed Services? <input type="checkbox"/> Yes <input type="checkbox"/> No																		
WAIVER PARTICIPANT INFORMATION	Waiver Participant's First Name: _____ Waiver Participant's Last Name: _____ Date of Birth (MM/DD/YYYY): _____ Social Security #: _____ Medicaid Number: _____ Race or Ethnicity: <input type="checkbox"/> Asian <input type="checkbox"/> American Indian or Alaska Native <input type="checkbox"/> Pacific Islander Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Unspecified <input type="checkbox"/> Black or African American <input type="checkbox"/> Hispanic or Latino Diagnosis/Illnesses (if known): _____ <input type="checkbox"/> White <input type="checkbox"/> Not Known <input type="checkbox"/> Other																	
	Reporting Agency: _____ Reporter's Title: _____ Reporter's First Name: _____ Reporter's Last Name: _____ Reporter's Phone: _____ Did the reporter witness the incident? <input type="checkbox"/> Yes <input type="checkbox"/> No																	
REPORTING SOURCE	<table><thead><tr><th>Critical Incidents</th><th>Non-Critical Incidents</th></tr></thead><tbody><tr><td><input type="checkbox"/> Suspected Abuse</td><td><input type="checkbox"/> Serious Medication Error</td></tr><tr><td><input type="checkbox"/> Suspected Neglect</td><td><input type="checkbox"/> Natural or Expected Death</td></tr><tr><td><input type="checkbox"/> Suspected Exploitation</td><td><input type="checkbox"/> Unnatural or Unexpected Death</td></tr><tr><td><input type="checkbox"/> Homicidal Ideation</td><td><input type="checkbox"/> Suicidal Ideation</td></tr><tr><td><input type="checkbox"/> Missing Person</td><td><input type="checkbox"/> Unplanned Hospital Admission</td></tr><tr><td><input type="checkbox"/> Event Involving Police/ Emergency Personnel Intervention</td><td><input type="checkbox"/> Emergency Room or Emergency Department Visit</td></tr><tr><td>Three or More Non-Critical Incidents of the Same Incident Type in a 90 Calendar Day Period</td><td>Other (describe): _____</td></tr></tbody></table>	Critical Incidents	Non-Critical Incidents	<input type="checkbox"/> Suspected Abuse	<input type="checkbox"/> Serious Medication Error	<input type="checkbox"/> Suspected Neglect	<input type="checkbox"/> Natural or Expected Death	<input type="checkbox"/> Suspected Exploitation	<input type="checkbox"/> Unnatural or Unexpected Death	<input type="checkbox"/> Homicidal Ideation	<input type="checkbox"/> Suicidal Ideation	<input type="checkbox"/> Missing Person	<input type="checkbox"/> Unplanned Hospital Admission	<input type="checkbox"/> Event Involving Police/ Emergency Personnel Intervention	<input type="checkbox"/> Emergency Room or Emergency Department Visit	Three or More Non-Critical Incidents of the Same Incident Type in a 90 Calendar Day Period	Other (describe): _____	<input type="checkbox"/> Minor Injury <input type="checkbox"/> Medication Error without Serious Outcome
	Critical Incidents	Non-Critical Incidents																
<input type="checkbox"/> Suspected Abuse	<input type="checkbox"/> Serious Medication Error																	
<input type="checkbox"/> Suspected Neglect	<input type="checkbox"/> Natural or Expected Death																	
<input type="checkbox"/> Suspected Exploitation	<input type="checkbox"/> Unnatural or Unexpected Death																	
<input type="checkbox"/> Homicidal Ideation	<input type="checkbox"/> Suicidal Ideation																	
<input type="checkbox"/> Missing Person	<input type="checkbox"/> Unplanned Hospital Admission																	
<input type="checkbox"/> Event Involving Police/ Emergency Personnel Intervention	<input type="checkbox"/> Emergency Room or Emergency Department Visit																	
Three or More Non-Critical Incidents of the Same Incident Type in a 90 Calendar Day Period	Other (describe): _____																	

 || INCIDENT INFORMATION (PAGE 1) | Level of Harm or Injury to the Waiver Participant: (Choose one) ☐ Level 1: None ☐ Level 2: Injury or harm requiring treatment up to and including first aid ☐ Level 3: Injury or harm requiring medical treatment beyond first aid, injury or harm requiring hospitalization ☐ Level 4: Injury or harm resulting in death | |
| Date of Incident (MM/DD/YY): _____ Discovery Date (MM/DD/YY): _____ | |

Training Materials

Critical Incident Reporting Requirements

For Community Centered Boards
and Service Provider Agencies

DIVISION FOR INTELLECTUAL AND
DEVELOPMENTAL DISABILITIES

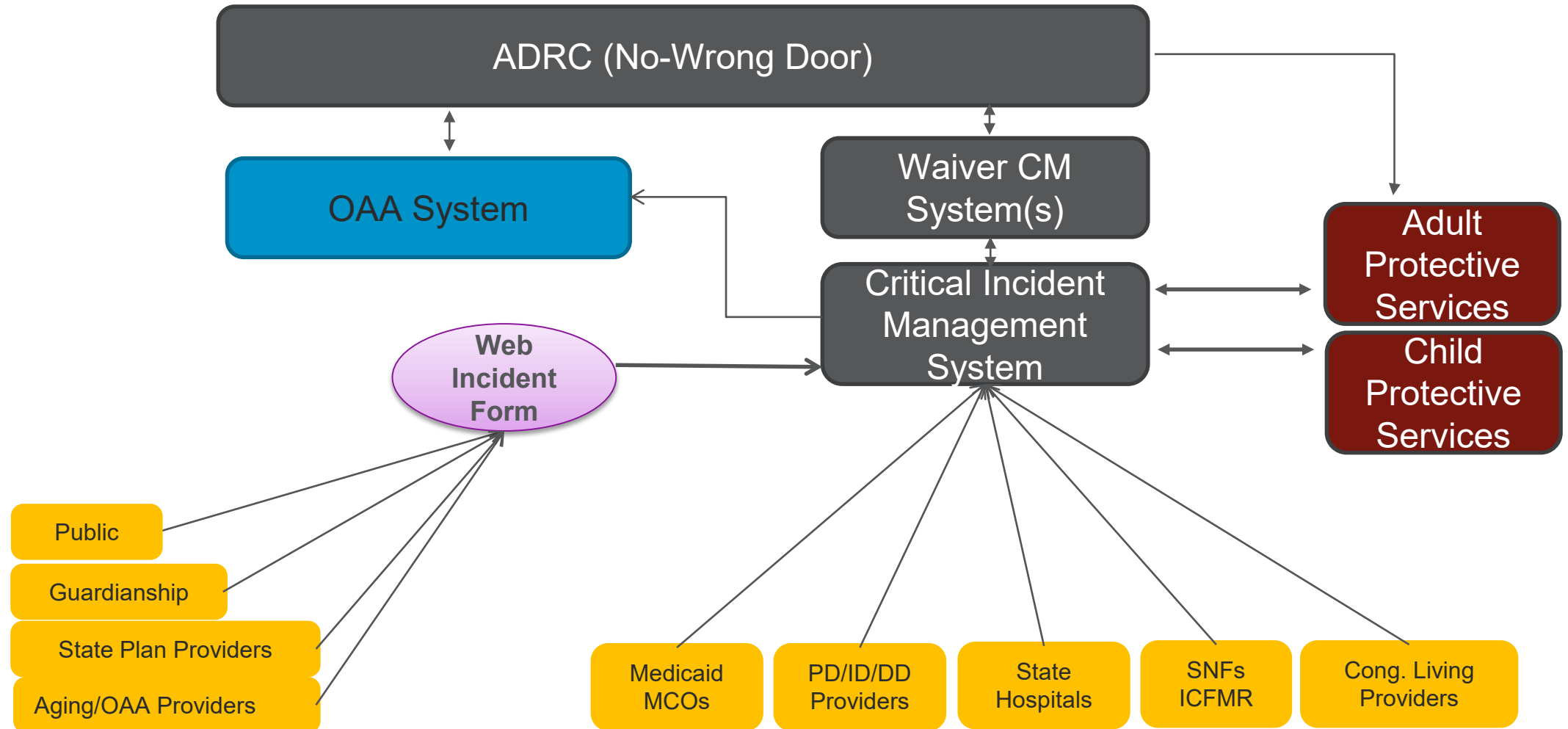
May 2017

Critical Incident Investigations for 1915(c) Home and Community Based Services (HCBS) Waivers Direct Service Providers and Case Managers

Commonwealth of Kentucky
Cabinet for Health and Family Services
Division of Developmental and Intellectual Disabilities

May 22, 2019

RECOMMENDATION #4: CREATE A SINGLE WEB-BASED SYSTEM TO TRACK CRITICAL INCIDENTS



PROTECTIVE SERVICES DATA TO FACILITATE INTERDEPARTMENTAL COMMUNICATION

- **Determine when to contact protective services.**
 - Severe Incidents may require immediate referral to protective services.
 - Early identification helps set expectations for the investigation
- **Data sharing may happen:**
 - Through creation of reports and triggers
 - Posted in centralized system
 - Weekly meetings
- **All protective service calls are critical incidents, but not all critical incidents will rise to the level of a protective services investigation.**

Protective Services Data	
Intake Number	94994994
Age at Time of Intake	45
Allegation and Finding 1	
Maltreatment 1	Exploitation
Finding 1	Verified
Caregiver Responsible 1	Rita Jones
Add Another 2	<input type="checkbox"/>
Intake Information	
Date Received	07/11/2017
Date Complete	07/11/2017
Provider Name	Helping Hands Supported Living
Provider Street Address	123 Main Street
Provider City	GAINESVILLE
Facility Type	Supported Living
Child?	<input type="checkbox"/>
Regional Office Follow Up Actions:	
Follow Up Actions:	Perpetrator no longer has access to the victim and/or other corrective actions made to prevent recurrence
Location Type:	<input type="radio"/> ADT <input type="radio"/> APD Licensed Facility <input checked="" type="radio"/> Supported Living
Site Visit:	<input checked="" type="radio"/> Completed within 24 hours <input type="radio"/> Completed - not within 24 hours <input type="radio"/> Not Completed
Site Visit Completion Date:	07/10/2017
State Office Follow-up Actions:	
Living Setting at time of ANE:	Supported living
Relationship of AP:	Staff member
Type of Physical Injury:	N/A
Type of Medical Neglect:	N/A

CRITICAL FUNCTIONALITY FOR ELECTRONIC REPORTING/MANAGEMENT OF CRITICAL INCIDENTS

- Multiple mechanisms for submitting incident reports
- Ability to compare incident occurrence date/time to incident submission date/time as a performance indicator
- Workflow automation to allow for different workflow for different incident types
- Mechanisms to ensure that incident reports flow through often complex, multi-tiered review/approval process
- Tracking of incident review, follow-up and when necessary, investigation
- Ability to report on critical incidents to detect providers in need of additional training and/or sanction, detect trends, etc.

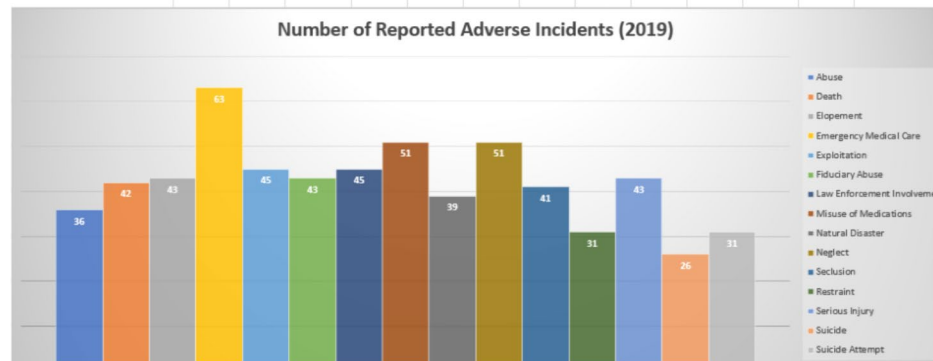
RECOMMENDATION #5: TRACK AND ANALYZE MEANINGFUL DATA POINTS TO MINIMIZE PREVENTABLE INCIDENTS

States should consider tracking at least the following data points:

- **Waiver Measures:** Performance measures that are described in the state's 1915(c) waivers (e.g., # of critical incidents resolved within 30 days of the date of the critical incident report date)
- **Reporting Timeframes:** Number of critical incidents reported within required timeframes
- **Severe Cases:** Status/outcome of reported abuse, neglect or exploitation (ANE) cases
- **Member Specific Dashboard:** Number and type of incident reports for a member during a specified timeframe
- **Provider Specific Dashboard:** Number and type of incident reports for a provider during a specified timeframe
- **Emergency Room (High Cost Claims):** Usage of ER visits.

RECOMMENDATION #5: TRACK AND ANALYZE MEANINGFUL DATA POINTS TO MINIMIZE PREVENTABLE INCIDENTS (CONTINUED)

Number of Reported Adverse Incidents-Statewide												
Type of Adverse Incident	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Abuse	63	57	43	46	53	54	58	53	47	48	55	53
Death	1	2	1	5	1	5	5	2	5	1	6	2
Elopement	5	3	3	2	3	4	1	5	1	5	5	5
Emergency Medical Care	6	4	5	1	5	2	3	1	4	6	2	4
Exploitation	4	5	4	4	7	8	5	6	6	1	7	6
Fiduciary Abuse	2	2	2	5	5	6	6	4	3	4	3	3
Law Enforcement Involvement	5	1	6	3	2	4	4	2	5	2	4	5
Misuse of Medications	1	6	2	6	6	2	7	5	5	3	1	1
Natural Disaster	4	4	4	4	3	5	5	5	4	3	5	5
Neglect	5	4	2	2	4	6	4	4	2	2	2	2
Seclusion	6	6	3	5	2	3	1	6	4	5	6	4
Restraint	8	5	2	2	3	1	3	2	1	6	3	5
Serious Injury	7	2	1	2	4	1	5	1	1	3	1	3
Suicide	2	4	5	1	5	2	6	7	3	2	4	2
Suicide Attempt	3	7	2	1	2	1	2	1	1	4	1	1
	4	2	1	3	1	4	1	2	2	1	5	5



Number of Reported Adverse Incidents-By MCO												
Waiver Population	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Total	63	57	63	57	63							
MCO 1	25	22	25	22	25							
MCO2	20	17	20	17	20							
MCO3	18	18	18	18	15							

Adverse Incidents by MCO (2019)



Performance Measures		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT
PM 1	Number and percent of reported critical incidents requiring review/investigation where the State adhered to its follow-up measures	95%	98%	95%	98%	95%	98%	95%	98%	95%	98%
PM 2	Number and percent of restraint applications, seclusion or other restrictive interventions that followed procedures as specified in the approved waiver	93%	71%	93%	71%	93%	71%	93%	71%	93%	71%
PM 3	Number and percent of unauthorized uses of restrictive interventions that were appropriately reported	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
PM 4	Number and percent of unexpected deaths for which review/investigation followed the appropriate policies and procedures	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
PM 5	Number and percent of unexpected deaths for which review/investigation resulted in the identification of preventable causes	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%
PM 6	Number and percent of unexpected deaths for which the appropriate follow-up measures were taken	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
PM 7	Number and percent of waiver participants who received information on how to report suspected incidents	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

RECOMMENDATION #5: TRACK AND ANALYZE MEANINGFUL DATA POINTS TO MINIMIZE PREVENTABLE INCIDENTS (CONTINUED)

Table 1. Number of Reported Adverse Incidents- Statewide		Table 2. Number of Reported Adverse Incidents-By Waiver Population		Table 3. Number of Reported Adverse Incidents-By MCO	
Type of Adverse Incident	# of Incidents	Waiver Population	# of Incidents Statewide	MCO	# of Incidents
Total	57	Total	57	Total Statewide	
Abuse	2	PD	5	MMCO1	
Alcohol	3	FE	10	MMCO2	
Assault	4	IDD	11	MMCO3	
Emergency Medical Care	5	TBI	6		
Exploitation	2	TA	8		
Financial Abuse	1	AUTISM	9		
Law Enforcement Involvement	6	SED	8		
Use of Medications	4				
Natural Disaster	4				
Neglect	6				
Seclusion	5				
Strait	2				
Serious Injury	4				
Suicide	7				
Suicide Attempt	2				
Table 4. Days Between Date Received and Date Referred		Table 5. Days Between Date Received and Date Resolved		Table 6. Number of Adverse Incidents Referred to DCF	
MCO	Avg # Calendar Days	MCO	Avg # Calendar Days	MCO	# of Incidents
MMCO1	2	MMCO1	10	MMCO1	
MMCO2	1.8	MMCO2	12	MMCO2	
MMCO3	2.2	MMCO3	31	MMCO3	
Table 7. Number and percent of cases where the use of restraints explanation and process was documented		Table 8. Number and percent of cases where the use of seclusion explanation and process was documented		Table 9. Number and percent of cases where the use of other restrictive interventions explanation and process was documented	
	Statewide		Statewide		Statewide
Percent	100%	Percent	80%	Percent	80%
Numerator	2	Numerator	4	Numerator	
Denominator	2	Denominator	5	Denominator	
N = Number of cases where the use of restraints explanation and process was documented		N = Number of cases where the use of seclusion explanation and process was documented		N = Number of cases where the use of other restrictive interventions explanation and process was documented	
D = Total number of cases where restraints were used		D = Total number of cases where seclusion was used		D = Total number of cases where other restrictive interventions were used	

CMS GUIDANCE IN ANALYZING CRITICAL INCIDENT DATA



INCIDENT MANAGEMENT 101

Division of Long Term Services and Supports
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services



<https://www.medicaid.gov/medicaid/hcbs/downloads/training/incident-management-101.pdf>

- Commit to a **regular schedule** for aggregating and **analyzing findings and trends (no less than annual basis)**
- Identify areas of **improvement, interventions** to address adverse trends and patterns, and **training opportunities** for stakeholders to help prevent and mitigate incidents
- Gathering information for system-wide oversight, including:
 - Participant and provider characteristics
 - How quickly reports are reviewed, investigated, and followed-up
 - Results of investigations
- Determine the **types of analysis** to conduct, which may include:
 - Recurring deficiencies;
 - Types of incidents;
 - Types of providers/provider analysis;
 - Location of incidents;
 - Alleged perpetrators;
 - Investigation findings of: Outlier incidents; Abuse, neglect or exploitation; ER visits/hospitalizations;
 - Incident resolution timelines; and
 - Other medical findings

CONTACTS

Dr. Jay Bulot

Vice President for State Markets

WellSky Corporation

Jay.Bulot@WellSky.com

Dustin Schmidt

Associate Director

Navigant

Dustin.Schmidt@Navigant.com

About WellSky

WellSky is a technology company advancing human wellness worldwide. Our software and professional services address the continuum of health and social care — helping businesses, organizations, and communities solve tough challenges, improve collaboration for growth, and achieve better outcomes through predictive insights that only WellSky solutions can provide.

We are committed to

- Serving our customers to ensure they can serve their communities
- Anticipating provider needs in an ever-changing care landscape
- Using data and applied insights to elevate and intelligently scale care

Together, we are realizing care's potential and building communities that thrive.

We partner with organizations across the care spectrum



Hospital:

Ensuring hospitals can focus on delivering superior patient care safely and efficiently



Practices & Facilities:

Enhancing providers' abilities to streamline operations and focus on the delivery of care



Home:

Empowering providers to deliver exceptional care while focusing on improving outcomes



Community:

Supporting dynamic communities of care with our diverse set of human services solutions



Hospital

- Blood Transfusion
- Hospital Donor Program
- Biotherapy Clinics
- Inpatient Rehabilitation
- Outpatient Rehabilitation
- Acute Respiratory & Rehabilitation
- Enterprise Scheduling
- Medication Management
- International Medication Management



Home

- Home Health
- Hospice
- Home Infusion
- Specialty Pharmacy
- Home Medical Equipment
- Private Duty
- Home Health Therapy
- OASIS Review & Coding
- Billing & Revenue Cycle Services
- DDE & Payer Connection



Practices & Facilities

- Behavioral Health & IDD Providers
- Donor Testing Services
- Biotherapy Labs
- Private Practice Rehabilitation
- Scheduling
- Long-Term Care
- Correctional Medication Management



Community

- Payers
- IDD Payers
- Aging & Disability
- Protective Services
- Incident Management
- Information & Referral
- Community-Based Organizations
- Housing & Homelessness
- Blood Centers



Hospital

- FDA 510(k) cleared system for blood banks
- The blood compliance solution for U.S. Department of Defense facilities worldwide
- + 450 transfusion sites worldwide
- + 20,000 cord blood and tissue donors registered



Home

- +4,500 home health and hospice agencies
- +34 million billable visits in 12 months
- +\$11 billion Medicare claims processed
- +200,000 care tasks every day



Practices and Facilities

- +50 million blood donor tests annually
- +22 million rehab treatments in 12 months
- +2.3 million rehab patients served in 12 months
- +135 medication management facilities (including 34 correctional health facilities)



Community

- +35,000 daily users
- + 3,000 agencies providing services
- Used by majority of Area Agencies on Aging
- Used by majority of HUD Continuums of Care
- Customer organizations in 50 US states, Washington D.C., and Canada