

# Developmental Disabilities Administration Continuity of Operations Plan - Incident Reporting Guidance

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#### AUDIENCE

- DDA Certified and Licensed Providers
- Coordinators of Community Services
- Developmental Disabilities Administration (DDA)
- Office of Health Care Quality
- Potomac and Holly Center
- Secure Evaluation and Therapeutic Treatment (SETT)

### **PURPOSE**

This guidance outlines the Continuity of Operations Plan (COOP) for incident reporting when the DDA Provider Consumer Information System (PCIS2) is temporarily offline.

#### **DEFINITIONS**

- A. "Coordination of Community Services" means targeted case management services provided pursuant to and in accordance with COMAR 10.09.48 that assist participants in requesting DDA-funded services.
- B. "Coordinator of Community Services" or "CCS" means an individual who provides Coordination of Community Services either as an employee or contractor of a DDA provider licensed or certified/approved to provide Coordination of Community Services.
- C. "DDA Medicaid Waiver program" means each Medicaid Home- & Community-Based Waiver program submitted by the Maryland Department of Health and approved by the Centers for Medicare & Medicaid Services pursuant to § 1915(c) of the federal Social Security Act, which is overseen and administered by DDA: Community Pathways, Community Supports, and Family Supports.
- D. "DDA Provider" means an individual or entity, licensed or certified/approved by the Maryland Department of Health, that furnishes DDA-funded services to applicant(s) or participant(s) in accordance with the DDA's requirements and, if furnishing Waiver program services, enrolled as a provider in the Medicaid Program.
- E. "Department" means the Maryland Department of Health, or its authorized agent acting on behalf of the Department.
- F. "LTSS*Maryland*" means an electronic information system, developed and supported by the Maryland Department of Health, used by DDA, the CCS, and DDA Providers to create, review, and maintain records regarding an individual's eligibility status for DDA-funded services, the individual's Person-Centered Plan, and services and funding authorized by the DDA.
- G. "Participant" means an individual enrolled in, and receiving, DDA-funded services.
- H. "<u>Provider Consumer Information System (PCIS2)</u>" means DDA's legacy Management Information System. The system tracks licensed statewide information on the following areas: Provider Demographics, Consumer Demographics, Rates, Contracts, Payments, Community Services Budget, Incidents, Waiting List, and Federal Fund Participation.
- I. "Policy on Reportable Incidents and Investigations (PORII)" means policy, as required by COMAR 10.22.02.01, to ensure the health, safety and welfare of individuals receiving services from DDA- funded providers by formalizing a process to identify, report, and resolve incidents in a timely manner.

- J. "Regional Office" or "RO" means one of the four local offices of the DDA, serving as the point of contact for applicants, participants, and DDA providers located in certain counties of Maryland. Each RO has the authority to review individual PCPs and authorize funding for services. The Regional Offices are: (1) Central Maryland Regional Office, serving Anne Arundel, Baltimore, Howard, and Harford Counties and Baltimore City; (2) Eastern Shore Regional Office, serving Caroline, Cecil, Dorchester, Kent, Queen Anne's, Somerset, Talbot, Wicomico, and Worcester Counties; (3) Southern Maryland Regional Office, serving Calvert, Charles, Montgomery, Prince George's, and St. Mary's Counties; and (4) Western Maryland Regional Office, serving Allegany, Carroll, Frederick, Garrett, and Washington Counties.
- K. "Remediation" means action to resolve non-compliance investigations and concerns that arise.

#### **APPLICABILITY**

This guidance applies to:

- Coordinator of Community Services and Providers submission of incident reports
- Holly, Potomac and SETT submission of incident reports
- Providers submission of Agency Incident Reports (AIRS)
- DDA Regional Office review and follow up actions
- OHCQ triage, review, and follow up actions

# **Type 1 Incident Report Submission**

#### CCS, Providers, Holly Center, Potomac Center, and SETT shall:

- 1. Complete a DDA incident report using either:
  - a. The DDA Incident Report form (Appendix 4 template);OR
  - b. An electronic or Microsoft Word version that matches the DDA forms; OR
  - c. The *new* <u>DDA Combined Incident Report and Agency Investigation Reporting</u> Form 12-16-2021

Note: This form can be used to submit the initial incident report and updated to include information for the Agency Investigation Report (AIR) so that providers do not have to enter the information twice.

- 2. Submit the report via a secured, confidential email to the following:
  - a. OHCQ contacts <u>darlene.harlow@maryland.gov</u> and <u>jill.melton@maryland.gov</u>;
  - b. The respective DDA Regional Office:
    - CMRO- <u>cmrotriage.ddaqa@maryland.gov</u>

- ESRO- <u>emrotriage.ddaqa@maryland.gov</u>
- SMRO- <u>smrotriage.ddaqa@maryland.gov</u>
- WMRO- wmrotriage.ddaqa@maryland.gov; and
- c. The participant's Coordinator of Community Services
- d. In the event that the provider receives a reply message indicating the email did not go through, please alert the RO QE Director who will submit a help ticket to OET for review
  - Example of message: Message bounced due to organizational settings
- e. Subject Line: **IR** (insert person's LTSSMaryland ID#) -(insert Type 1 or Type 2 as applicable) Incident Report (insert Agency name)
- a. Body of the Message: *Please see attached incident being submitted due to the MDH network incident.*
- b. Note: Holly Center, Potomac Center, and SETT supporting people without a LTSSMaryland ID# shall be submitted with the person's unique resident number
- 3. **Correct Incident Report** If the provider discovers a mistake in the original incident report then:
  - a. The provider is to *resubmit* the incident to the DDA dedicated email address with the updated information.
  - b. Email Subject Line should read: **Correction IR** (insert person's LTSSMaryland ID#) -(insert Type 1 or Type 2 as applicable) Incident Report (insert Agency name) (insert DDA unique reference number noted in the initial report DDA acknowledgement email)

    For example: Correction IR 123456789-Type 1 Incident Report 4BC
    - For example: Correction IR 123456789-Type 1 Incident Report ABC Agency-C-0001
  - c. Body of the Message: Please see attached incident report being resubmitted due to mistakes in the initial report.
- 4. **Withdraw Incident Report** -If the provider discovers an incident reports need to be *withdrawn* (e.g., submitted by accident, not reportable per PORII, etc) then:
  - a. The provider is to send an email to the DDA dedicated email address to note it is being withdrawn.
  - b. Email Subject Line should read: **Withdraw IR** (*insert person's LTSSMaryland ID#*) -(*insert Type 1 or Type 2 as applicable*) Incident Report (*insert Agency name*) (*insert DDA unique reference number noted in the initial report DDA acknowledgement email*) For example: Withdraw IR 123456789-Type 1 Incident Report ABC Agency-C-0001
  - c. Body of the Message: Please see attached incident report being withdrawn as it (*insert reason*).

#### 5. Once PCIS2 is back online:

- a. Incident reports will need to be resubmitted through the PCIS2 incident module as PCIS2 is the system of record for incidents.
- b. Providers should note in the PCIS2 Incident Report within the "Agency Incident Number" the individuals DDA unique reference number when submitting.
- c. Providers should note in the PCIS2 Incident Report within the "XI) Please provide any other relevant information" and "XI-b) Please provide any other relevant information for Agency Investigation Reports" section (as applicable) the following information:
  - This incident was originally reported to the DDA under the COOP Incident Reporting Guidance. Please reference: IR (insert person's LTSSMaryland ID#) -(insert Type 1 or Type 2 as applicable) Incident Report (insert Agency name) (insert DDA unique reference number noted in the initial report DDA acknowledgement email)

For example: IR - 123456789-Type 1 Incident Report - ABC Agency-C-0001

# XI) Please provide any other relevant information This incident was originally reported to the DDA under the COOP Incident Reporting Guidance. Please reference: (insert person's LTSSMaryland ID#) - (insert Type 1 or Type 2 as applicable) Incident Report - (insert Agency name) - (insert DDA unique reference number noted in the initial report DDA acknowledgement email) XI-b) Please provide any other relevant information for Agency Investigation Report

#### Resources:

Policy and Reportable Incidents and Investigations

- Policy on Reportable Incidents
  - o DDA PORII Alert, Sept. 4, 2015
  - Appendix 3/3A (Incident Reporting Tips)
  - Appendix 6 (AIR Incident Reporting Tips)
  - o Appendix 8 (FAQs)

#### **DDA Incident Report**

• Appendix 4 template (Incident Report Form)

# **Type 2 Incident Report Submission**

#### CCS, Providers, Holly Center, Potomac Center, and SETT shall:

- 1. Complete a DDA incident report using either:
  - a. The DDA Incident Report form (Appendix 4 template); OR

- b. An electronic or Microsoft Word version that matches the DDA forms; OR
- c. The new <u>DDA Combined Incident Report and Agency Investigation Reporting</u> Form 12-16-2021

Note: The form can be used to submit the initial incident report and updated to include information for the Agency Investigation Report (AIR) so that providers do not have to enter the information twice.

- 2. Submit the report via a secured, confidential email to the following:
  - a. The respective DDA Regional Office:
    - CMRO- <u>cmrotriage.ddaqa@maryland.gov</u>
    - ESRO- emrotriage.ddaqa@maryland.gov
    - SMRO- <u>smrotriage.ddaga@maryland.gov</u>
    - WMRO-<u>wmrotriage.ddaqa@maryland.gov; and</u>
  - b. The participant's Coordinator of Community Services
- 3. In the event that the provider receives a reply message indicating the email did not go through, please alert the RO QE Director who will submit a help ticket to OET for review
  - Example of message: Message bounced due to organizational settings
- 4. Email structure:
  - a. Subject Line: **IR** (insert person's LTSSMaryland ID#) -(insert Type 1 or Type 2 as applicable) Incident Report (insert Agency name)
  - b. Body of the Message: *Please see attached incident being submitted due to the MDH network incident.*
  - c. Note: Holly Center, Potomac Center, and SETT supporting people <u>without</u>

    <u>LTSSMaryland ID#</u> shall be submitted with the person's unique resident number
- 5. **Correct Incident Report** -If the provider discovers a mistake in the original incident report then:
  - a. The provider is to resubmit the incident to the DDA dedicated email address with the updated information.
  - b. Email Subject Line should read: **Correction IR\_-** (*insert person's LTSSMaryland ID#*) -(*insert Type 1 or Type 2 as applicable*) Incident Report (*insert Agency name*) (*insert DDA unique reference number noted in the initial report DDA acknowledgement email*)
    - For example: Correction IR- 123456789-Type 1 Incident Report ABC Agency-C-0001
  - c. Body of the Message: Please see attached incident report being resubmitted due to mistakes in the initial report.
- 6. **Withdraw Incident Report** -If the provider discovers an incident reports need to be **withdrawn** (e.g., submitted by accident, not reportable per PORII, etc.) then:
  - a. The provider is to send an email to the DDA dedicated email address to note it is being withdrawn.

- b. Email Subject Line should read: Withdraw IR- (insert person's LTSSMaryland ID#)
  -(insert Type 1 or Type 2 as applicable) Incident Report (insert Agency name) (insert DDA unique reference number noted in the initial report DDA
  acknowledgement email) For example: Withdraw IR 123456789-Type 1 Incident Report ABC
  Agency-C-0001
- c. Body of the Message: Please see attached incident report being withdrawn as it (*insert reason*).

#### 7. Once PCIS2 is back online:

- a. Incident reports will need to be resubmitted through the PCIS2 incident module as PCIS2 is the system of record for incidents.
- b. Providers should note in the PCIS2 Incident Report within the "Agency Incident Number" the individuals DDA unique reference number when submitting.
- c. Providers should note in the PCIS2 Incident Report within the "XI) Please provide any other relevant information" and "XI-b) Please provide any other relevant information for Agency Investigation Reports" section (as applicable) the following information:
  - This incident was originally reported to the DDA under the COOP Incident Reporting Guidance. Please reference: IR - (insert person's LTSSMaryland ID#) -(insert Type 1 or Type 2 as applicable) Incident Report - (insert Agency name) - (insert DDA unique reference number noted in the initial report DDA acknowledgement email)

For example: IR - 123456789-Type 1 Incident Report - ABC Agency-C-0001

#### XI) Please provide any other relevant information

This incident was originally reported to the DDA under the COOP Incident Reporting Guidance. Please reference: (insert person's LTSSMaryland ID#) -(insert Type 1 or Type 2 as applicable) Incident Report - (insert Agency name) - (insert DDA unique reference number noted in the initial report DDA acknowledgement email)

#### Resources:

Policy and Reportable Incidents and Investigations

- Policy on Reportable Incidents
  - o DDA PORII Alert, Sept. 4, 2015
  - Appendix 3/3A (Incident Reporting Tips)
  - Appendix 6 (AIR Incident Reporting Tips)
  - o Appendix 8 (FAQs)

#### **DDA Incident Report**

• Appendix 4 template (Incident Report Form

# **Agency Investigation Report (AIR)**

#### A. CCS, Providers, Holly Center, Potomac Center, and SETT shall:

- 1. Complete a DDA Agency Investigation Report (AIR) using either:
  - a. The DDA Agency Investigation Report (AIR) form (Appendix 7 template); OR
  - b. An electronic or Microsoft Word version that matches the DDA forms; OR
  - c. The new <u>DDA Combined Incident Report and Agency Investigation Reporting Form</u> 12-16-2021

Note: The form can be used to submit the initial incident report and updated to include information for the Agency Investigation Report (AIR) so that providers do not have to enter the information twice.

- 2. Submit the report via a secured, confidential email to the following:
  - a. The respective DDA Regional Office:
    - CMRO- <u>cmrotriage.ddaqa@maryland.gov</u>
    - ESRO- emrotriage.ddaqa@maryland.gov
    - SMRO- <u>smrotriage.ddaqa@maryland.gov</u>
    - WMRO- wmrotriage.ddaqa@maryland.gov; and
  - b. The participant's Coordinator of Community Services
- 3. In the event that the provider receives a reply message indicating the email did not go through, please alert the RO QE Director who will submit a help ticket to OET for review Example of message: *Message bounced due to organizational settings*
- 4. Email structure:
  - a. Subject Line: AIR (insert person's LTSSMaryland ID#) -(insert Type 1 or Type 2 as applicable) Incident Report (insert Agency name) (insert DDA unique reference number noted in the initial report DDA acknowledgement email)
  - b. Body of the Message: *Please see attached Agency Investigation Report (AIR) being submitted due to the MDH network incident.*
  - c. Note: Holly Center, Potomac Center, and SETT supporting people <u>without a LTSSMaryland ID#</u> shall be submitted with the person's unique resident number

#### B. Agency Investigation Report (AIR) associated with incidents previously submitted to PCIS2:

- 1. Complete a DDA Agency Investigation Report (AIR) using either:
  - a. The DDA IAgency Investigation Report (AIR) forms (Appendix 7 template) OR
  - b. An electronic or Microsoft Word version that matches the DDA forms OR
  - c. The new <u>DDA Combined Incident Report and Agency Investigation Reporting Form</u> 12-16-2021

Note: The form can be used to submit the initial incident report and updated to include information for the Agency Investigation Report (AIR) so that providers do not have to enter the information twice.

- 2. Submit the report via a secured, confidential email to the following:
  - a. The respective DDA Regional Office:
    - CMRO- <u>cmrotriage.ddaga@maryland.gov</u>
    - ESRO- emrotriage.ddaqa@maryland.gov
    - SMRO- <u>smrotriage.ddaga@maryland.gov</u>
    - WMRO- wmrotriage.ddaqa@maryland.gov, and
  - b. The participant's Coordinator of Community Services
- 3. In the event that the provider receives a reply message indicating the email did not go through, please alert the RO QE Director who will submit a help ticket to OET for review Example of message: *Message bounced due to organizational settings*
- 4. Email structure:
  - a. Subject Line: **AIR** -(insert person's LTSSMaryland ID#) -(insert Type 1 or Type 2 as applicable) Incident Report (insert Agency name) (insert PCIS2 Incident ID#)
  - b. Body of the Message: *Please see attached Agency Investigation Report (AIR) due that is associated with an incident that was previously submitted via PCIS2.*
  - c. Note: Holly Center, Potomac Center, and SETT supporting people <u>without a LTSSMaryland ID#</u> shall be submitted with the person's unique resident number

#### C. Agency Investigation Report (AIR) Resubmission

- 1. AIRs submitted **after the close of business December 3, 2021** shall be resubmitted as noted above under B. as the DDA is unable to access and review.
- 2. The DDA may also request other outstanding AIRs to be resubmitted as noted above under B.

## **Internally Investigated Report**

- 1. Internally investigated incidents are those events or situations that shall be reported to designated staff within the agency. The agency is responsible for reviewing and investigating each of these incidents. Reference: PORII II. INTERNALLY INVESTIGATED INCIDENTS page 7
- 2. Each agency shall submit electronically to the DDA and OHCQ a listing of all internally investigated incidents which occurred during the prior quarterly period. This quarterly report is due January 15, April 15, July 15, and October 15.
  - a. Providers shall use any software (*e.g.*, Microsoft Word, Excel, etc.) to create the Quarterly Incident Report for Internally Investigated/Reviewed Incidents (A5) that matches the DDA form. Reference: <u>Appendix 5</u>
- 3. CCS, Providers, Holly Center, Potomac Center, and SETT Internally Investigated Reports (IIR) shall be submitted to the applicable DDA Regional Office by January 15, 2022 if the system is not on line at that time.

- 4. Submit the IIR via a secured, confidential email to the following:
  - a. OHCQ contacts <u>darlene.harlow@maryland.gov</u> and <u>jill.melton@maryland.gov</u>;
  - b. The respective DDA Regional Office:
    - CMRO- cmrotriage.ddaqa@maryland.gov
    - ESRO- emrotriage.ddaga@maryland.gov
    - SMRO- smrotriage.ddaqa@maryland.gov
    - WMRO- <u>wmrotriage.ddaga@maryland.gov;</u> and
  - c. The participant's Coordinator of Community Services
- 5. In the event that the provider receives a reply message indicating the email did not go through, please alert the RO QE Director who will submit a help ticket to OET for review Example of message: *Message bounced due to organizational settings*
- 6. Email structure:
  - a. Subject Line: Internally Investigated Report (insert Provider Name)
  - b. Body of the Message: *Please see attached Agency Investigation Report (AIR) being submitted due to the MDH network incident.*
  - c. Note: Holly Center, Potomac Center, and SETT supporting people <u>without a LTSSMaryland ID#</u> shall be submitted with the person's unique resident number
- 7. Quarterly Report Email structure:
  - a. Subject Line: Quarterly Incident Reports for Internally Investigated/Reviewed Incidents Report (insert Provider Name)
  - b. Body of the Message: Please see attached Quarterly Incident Report for Internally Investigated/Reviewed Incidents being submitted due to the MDH network incident.

# **Unwinding - COOP Incident Reporting**

The following action should be taken when the DDA informs stakeholders that the PCIS2 system is back online and in operation:

- Immediately resume normal incident reporting into the PCIS2 incident module, processes, and operations. Reference: PORII
- 2. Submit all Incident Reports (IR) via the PCIS2 incident module. Reference: Appendix 4
- 3. Submit all Agency Investigation Reports (AIR) via PCIS2 incident module. Reference: Appendix 7
- 4. Submit Internally Investigated Incidents as per normal processes and policy.
- 5. Incidents submitted to the Regional Office as per the COOP Incident Reporting Guidance:
  - All incidents shall be resubmitted into PCIS2 by March 14, 2022.
  - Initial IR needs to be submitted within PCIS2 before the AIR submission.

- When submitting incident reports from 12/6/21 1/31/22 please insert the DDA unique reference number you received in the *Agency Incident Number* data field in the PCIS2 incident report.
- 6. Please contact our service desk at servicedesk.dda@Maryland.gov to report any technical issues.

# **Questions**

Please contact the following DDA Regional Office Quality Enhancement staff associated with your region with any questions.

- CMRO- shireen.hodge-ryan@maryland.gov
- ESRO- adedapo.laditan@maryland.gov
- SMRO- mark.celeste@maryland.gov
- WMRO- dawn.orndoff@maryland.gov

Please also include the DDA Director of Quality Enhancement, Nicole Kropfelder, Nicole.Kropfelder1@maryland.gov to any correspondence to the regional office regarding *guidance* questions and or concerns; this *does not include incident reports*.