

COMMUNITY HEALTHCHOICES (CHC)

OPERATIONS MEMORANDUM #2022-03

SUBJECT: Enterprise Incident Management (EIM) Reporting System Changes due to the August 2022 EIM Quarterly Release

TO: CHC-Managed Care Organization (MCO)

FROM: Bureau of Policy Development and Communications Management

DATE: August 8, 2022

PURPOSE

The CHC Agreement, in Exhibit W(1), under “Critical Incident Reporting to the Department,” requires, in item A, that Network Providers and Subcontractors must report critical events or incidents to the CHC-MCOs. Item B requires that, using the Department’s EIM, the CHC-MCOs must investigate critical events or incidents reported by Network Providers and Subcontractors and report the outcomes of these investigations. Item C requires that CHC-MCOs must establish a process to receive and manage critical incident reports that both determines if an incident is reportable based on the definition of a critical incident and ensures all required fields are completed in EIM.

Additionally, Exhibit W(1), under “Critical Incident Investigation and Management,” gives the Department of Human Services the right to review incident reports and internal documentation, conduct its own investigations, and require further corrective actions by the CHC-MCOs.

This Ops Memo describes how the August 2022 EIM Quarterly Release affects CHC-MCO handling of critical incidents in EIM.

PROCEDURES

The Enterprise Incident Management system (EIM) has been modified, effective with the August 2022 EIM Quarterly Release, to update functions related to deletions of

critical incident reports as well as the access to complete incident reports submitted in EIM by all groups within the CHC-MCO network.

Critical Incident Reports Investigations and Documentation Completion

EIM has been modified to allow CHC-MCO users to complete incident reports for CHC home and community-based services (HCBS) participants initiated by Direct Service Providers. Modifications to data collection screens will allow users to record additional information related to investigations conducted by Protective Services, Service Coordinators, and CHC-MCOs.

Prior to this EIM update, CHC-MCOs were only able to access and revise EIM incident reports initiated by CHC-MCO staff. With this EIM update, once the incident report's First Section has been submitted, CHC-MCOs are able and required to access and complete CHC HCBS participants' incident reports submitted in EIM by Direct Service Providers within the CHC-MCO's network.

CHC-MCOs are required to complete all incident report sections related to the incident investigation, outcome, and follow-up, in addition to the MCO Management Review and closure activities, within the time frames prescribed in Exhibit W(1) of the CHC Agreement.

Critical Incident Report Deletions

The EIM update also allows CHC-MCOs to complete deletions of critical incident reports that have been submitted in error. CHC-MCOs are required to provide a clear and specific reason in the EIM record when deleting incident reports.

Prior to this EIM update, CHC-MCOs were able to delete incidents, regardless of the reason, before the First Section was submitted. With this EIM update, after the incident report's First Section has been submitted, CHC-MCOs are able and permitted to delete incident reports only for the following reasons:

- The incident report was entered for the incorrect participant. In this case, the Master Client Index (MCI) number of the correct participant must be provided in the "Reason for Deletion" box.
- The incident report is a duplicate. If this is the case, incident reports must be linked.
- The incident does not meet the critical incident criteria. For example, an incident report was submitted as a Service Interruption but the CHC-MCO later discovered that the participant's informal supports met their needs, and health, safety, and welfare were not at risk. For information on critical incident criteria, CHC-MCOs should refer to Exhibit W(1) of the CHC Agreement.

CHC-MCOs are not permitted to delete incident reports due to the following reasons:

- The incident report was submitted untimely.
- The incident report was investigated and closed untimely.

CHC-MCOs must submit a request to the Office of Long-Term Living (OLTL) for incident reports deletions due to the following reasons:

- A State Management Review was generated in error.
- A Provider is the target of an investigation. When this happens, the CHC-MCO takes over the investigation and re-enters the incident report. Incident reports must be linked by the CHC-MCO.

For instructions on how to link and delete incident reports, CHC-MCOs should refer to the “EIM Linking to Incidents and Complaints” Tip Sheet and the “Deleting Incidents and Complaints” EIM Reference Guide on the [Home and Community Services Learning Management System \(LMS\) website](https://www.hcsis.state.pa.us/HCSISLMS):
<https://www.hcsis.state.pa.us/HCSISLMS>

Reporting on Critical Incident Report Deletions

CHC-MCOS are required to submit to OLTL a quarterly report of all completed deletions and the reasons for deletions. CHC-MCOs must upload the reports to the respective “MCO Completed Deletions” DocuShare folder found in the same location as the OPS 30 CHC Waiver Assurance Performance Measures folders. Reports are due on April 3rd, July 3rd, October 3rd, and January 2nd of each year, beginning with October 3, 2022. If the due dates for the quarterly reports fall on a weekend or holiday, the reports will be due the next business day.

NEXT STEPS

1. Review this information with appropriate staff.
2. Contact the Critical Incident Management Unit at RA-PWINCIDENTMGMTUNT@pa.gov if you have questions.