DAUPHIN COUNTY MH/ID PROGRAM
POLICY AND PROCEDURE

Department  ____ MH  Policy No.  02-04

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  ____ Crisis  Approved  

Title: Incident Management Procedure for the Intellectual Disabilities Program

Policy: The Dauphin County Intellectual Disabilities (ID) Program will perform incident management in full compliance with the Incident Management Bulletin 6000-04-01. The Dauphin County Intellectual Disabilities Program will assure that actions are taken to promptly and adequately protect the health, safety, and rights of the individual receiving home and community based services. Incident management data generated through the incident management process is used to plan, implement, and monitor improved service delivery in the disability system.

Definitions:

County Incident Manager – A person in the County MH/ID Office is assigned this role in the incident management information and tracking system (HCSIS). This role includes performing a management review of each incident occurring in Dauphin County or involving individuals registered in the Dauphin County home and community system. The person holding this role has the responsibility to close incidents at the county level within thirty (30) days. It is the responsibility of the incident manager to communicate with providers, support coordinators, and the Central Region Office of Developmental Programs (ODP) regarding the incident management process.

Certified Investigator- Certified Investigators are people who have been trained according to Office of Developmental Programs specifications and received a certificate of investigation from Office of Developmental Programs (ODP). Providers, counties, and ODP are to have certified investigators available to conduct investigations when necessary under the Incident Management (IM) bulletin.

EIM – Enterprise Incident Management (EIM) is a web-based incident reporting system where incidents are recorded and where incident management reports and data are stored.

HCSIS – The Home and Community Services Information System is the web-based information system used to gain access to EIM.
Health Care Quality Unit (HCQU) – The HCQU is funded by the Office of Developmental Programs, and is responsible to provide training and monitor the quality of health care in home and community based service system. Dauphin County is part of a nine county consortium that contracts with the South Central Pennsylvania Health Care Quality Unit to perform this function.

Incident Report – Incidents defined in the Incident Management Bulletin must be reported in a uniform format. All reportable incidents are to be submitted electronically using the EIM system. In the event EIM system is unavailable, the faxed contingency report is to be utilized. This report is to be sent to the Central Region ODP as well as the Dauphin County ID office. The County ID fax number is (717) 780-7061.

Incident Reviewer – This is a role that a county can assign to one or more individuals to view incidents for multiple purposes and to facilitate the resolution of incidents. All of the County ID staff is assigned the role of Incident Reviewer.

Peer Review Team – Certified Investigators that review county and provider investigations semi-annually to ensure the quality of the investigative process.

Risk Management Team – This team is made up of AE members, SCO leadership members and the HCQU. The team meets monthly to review system and/or individual risks.

Reportable Incidents – An incident defined by the Bulletin as follows:

a. abuse (physical abuse, psychological abuse, sexual abuse, or verbal abuse)
b. accidents or injury requiring treatment beyond first aid
c. death
d. emergency closure
e. emergency room visit
f. fire
g. hospitalization
h. law enforcement activity
i. medication error
j. missing person
k. misuse of funds
l. psychiatric hospitalization
m. restraints (physical, mechanical, chemical)
n. rights violation
o. suicide attempt
Procedure:

The Dauphin County MH/ID Program assures compliance with the Incident Management Bulletin by implementation of the following procedures:

1. The Dauphin County ID System (AE/county) offers training and materials regarding incident reporting, prevention, and management, as well as health and safety related prevention in order to promote best practices. When providing training and materials, the county utilizes the ODP standardized and approved training curriculum. Technical assistance can be requested at any time.

2. A County Incident Manager is identified in the MH/ID Administrator’s Office (AE/county) and maintains an investigation file for all investigations. The County’s Incident Manager reviews incidents and takes prompt action when necessary to ensure that the appropriate follow-up actions are taken by providers and/or an investigation occurs at the provider or County level. The Dauphin County’s Incident Manager works very closely with CMU supervisors to review all incidents. The AE/county, along with the CMU, works with the providers of service to determine that the appropriate actions were taken and develop strategies around incident resolution. The AE/county reviews incidents and ensures that individual’s health, safety, and rights are being appropriately addressed and closes all incidents at the county level within the IM Bulletin’s timeframes – within 30 days.

3. The County Incident Manager will track all investigations using EIM to assure that all incidents, including incidents that require an investigation, are done in accordance with the ODP bulletin. The AE/county documents or requires the provider to document when investigations are not completed in accordance with ODP standards. This is documented in the Corrective Action section, Preventative Corrective Action section or the Additional Information Section of the Incident Report. The AE/county will reach out to ODP Central Regional Office for technical assistance as needed.

4. The Deputy Administrator for Intellectual Disabilities Services is an Incident Reviewer and oversees the work process. The Deputy Administrator and other ID program staff become involved or provide back up to the Incident Manager when the need arises. The Incident Manager is also a Certified Incident Investigator.

5. All incidents are reviewed within 24 hours, including weekends and holidays. The County contracts with Advocacy Alliance to perform the 24-hour review.

6. All investigations will be conducted by certified investigators and in compliance with the Certified Investigator’s Manual. Incidents that require an investigation may result in recommendations by the investigator. In the event recommendations are made, the Provider will write a plan of correction to address the recommendations made by the investigator. A copy of the Plan of Correction will be sent to the AE/county Incident Manager to review and approve. The supports coordinator and their supervisor monitor and follow up on corrective actions submitted to the county from certified investigations.
7. When an incident that requires an investigation is outside the scope of the provider, the provider agency is responsible to immediately inform the supports coordinator or appropriate CMU staff so that an investigator is assigned. If it is determined by the AE/county that an independent investigator should also be assigned, the AE/county or the CMU will assign an investigator from Advocacy Alliance. Independent investigations will be considered under the following circumstances:

a. An injury resulting from the use of an unauthorized or improper restraint, when its use results in the person requiring hospitalization or emergency room treatment, beyond what is reasonably considered first aid.

b. An allegation or finding of abuse involving improper or unauthorized use of restraints.

c. Any incident in which the CEO (Chief Executive Officer) or the Board of Directors of an organization is the target of the investigation.

d. The death of an individual receiving home and community services and in the care of a provider at the time of their death.

e. AE/county will assign an independent investigator upon the death of a program participant.

f. Other times as may be deemed necessary by the County.

8. The Dauphin County Peer Review Team analyzes and reviews the quality of investigations to ensure compliance with the IM Bulletin and Certified Investigator’s manual as well as provides feedback to provider and county staff to improve the certified investigator’s process.

9. The ID Department staff has all been assigned the role as Incident Reviewers in EIM, have access to and are trained in the use of the EIM web-based system, and they will review incidents as necessary. Data from EIM will be used to analyze and identify needed service improvements through the quality assurance process. The issues will be brought to the County’s Risk Management Team for review and discussion to develop best practice for all providers of service.

10. Immediate actions will be taken, as necessary, if it is deemed that the health and safety of an individual is at risk. The full power of the MH/ID Administrator’s Office will be used to assure that appropriate actions are taken by providers of service, the CMU, and other community organizations, including law enforcement agencies which may be involved in or needed to resolve a particular incident.

11. The Health Care Quality Unit should be utilized for training on needed health related topics as a component of incident prevention and management training efforts. Agencies may request HCQU services by contacting the CMU or may contact the HCQU directly.