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DIRECTIVE MEMORANDUM

TO: CCB Executive Directors
Program Approved Service Agency Directors
Regional Center Directors

FROM: Matthew Solano, Program Quality

SUBJECT: Revised Critical Incident Reporting System

TITLE: Web-Based Critical Incident Reporting System Requirements

Date: November 29, 2006

PURPOSE/BACKGROUND: The purpose of this memorandum is to provide Community Centered Boards (CCB) Regional Centers (RC) and Program Approved Service Agencies (PASA) with information regarding changes in the critical incident reporting system.

On September 24, 2006, the web-based critical incident reporting system was finalized and made accessible via DDD's web site, <http://www.cdhs.state.co.us/ddd/>. During the month of October, DDD Program Quality staff began entering incident reports into the web-based critical incident reporting system and completed training of CCB and RC staff. Subsequent to completing the training, several CCBs and all RCs have begun to utilize the web-based system. DDD has now determined that the Colorado developmental disabilities system is sufficiently prepared to fully implement the web-based Critical Incident Reporting System (CIRS). Additionally, DDD has recently completed a revision of the criteria for submitting a critical incident (dated 10/06 and attached to this memo). The CIRS was developed in part with funding received from a Real Choices Quality Assurance/Quality Improvement Grant provided by the Centers for Medicare and Medicaid Services (Grant # 92092/8). The CIRS utilizes demographic and other information from the Community Contract Management System (CCMS) to ensure data integrity for all critical incidents entered into the CIRS database.

This Directive Memorandum replaces previous directives issued by DDD regarding reporting of critical incidents (dated 3/1/2003 and 6/20/2003). This Directive Memorandum **does not** replace requirements for reporting incidents to other authorities as specified in DDD Rule 16.580 C. Additionally, all

CCB/RC and PASAs operating facilities licensed by the Colorado Department of Public Health and Environment must continue to comply with occurrence reporting requirements as specified in 25-1-124 C.R.S.

DIRECTIVE

Effective December 4, 2006, all CCBs, RCs and PASAs will be required to report all critical incidents through the CIRS. All critical incident reports submitted to DDD must be submitted to the CCB/RC responsible for providing case management to the involved person(s) receiving services. To successfully carry out this task, the following steps are to be completed for all incidents meeting the revised criteria (attached) for reporting a critical incident:

1. All agencies (CCBs, RCs and PASAs) providing services funded through DDD will report critical incidents (per the attached revised criteria) for all persons receiving Children's Extensive Supports and Services, Supported Living Services for Adults, Group Residential Services and Supports, Individual Residential Services and Supports, and Day Habilitation Services and Supports. Additionally, Regional Centers will continue to report critical incident for persons receiving services in an Intermediate Care Facility for the Mentally Retarded and services provided in the Skilled Nursing Facility operated by Grand Junction Regional Center. All such service agency providers will hereinafter be referred to as a "Reporting Agency".
2. All Reporting Agencies must immediately report critical incidents to the CCB/RC administration as soon as the Reporting Agency has been made aware of the incident and must submit documentation of a critical incident to the CCB/RC within 24 hrs of the occurrence of the incident. The Reporting Agency, at its discretion, may submit a duplicate copy of the critical incident documentation to DDD via fax (303-866-7470), US Mail or other delivery mechanism. In all instances, the Reporting Agency must complete an incident report in conformance with DDD Rules 16.560 and 16.580. To facilitate this process, DDD has created a critical incident report template available for use. The template is formatted in Microsoft Excel and allows the Reporting Agency to provide all information needed for submission of an incident in the CIRS system when attached to an e-mail sent to the CCB/RC. DDD will make the template available to CCBs/RCs and request these case management agencies to make the template available to service providers/Reporting Agencies in their area. A copy of the template may also be obtained via email from Sylvia Sablan (sylvia.sablan@state.co.us or 303-866-7439).
3. Upon receipt of the critical incident report from the reporting agency, the CCB/RC must submit the critical incident report via the CIRS by the end of the next business day (5:00 pm). DDD considers timely submission of critical incident to be a very serious requirement and will provide follow-up action to those situations in which there appears a pattern of tardy submission of critical incident reports by either a Reporting Agency or CCB/RC.
4. Reporting Agencies, CCBs and RCs are strongly encouraged to review the revised criteria for critical incidents with all supervisory and program management level staff members. Submission of reports not meeting the criteria for critical incidents diverts DDD and CCB/RC staff time from other job duties of higher priority. However, if there is doubt about whether an incident meets the criteria for reporting as a critical incident, the Reporting Agency and/or the CCB/RC should contact DDD Program Quality staff for additional information prior to submission of the report in the web-based CIRS. DDD will provide consultation with Reporting Agencies and CCB/RC staff if it appears that a significant number of critical incidents are rejected because the incidents do not meet criteria.

5. If DDD determines additional follow-up or reporting related to a specific incident is needed, the CCB/RC will be required to respond to requested follow-up within the *Followup* data fields in CIRS within the specified time period.
6. In those infrequent situations in which the Reporting Agency provides insufficient information for the CCB/RC to complete a report in the CIRS, DDD expects the CCB to enter all available and pertinent information it has received from the Reporting Agency in CIRS and to enter a comment in the *Primary Agency Comment* data field that describes the delay in obtaining complete information. The CCB/RC must then use the *Save* function to ensure DDD has been informed of the incident in a timely manner, even though the report was not approved by the CCB/RC and not yet submitted to DDD. Upon receipt of the additional needed information from the reporting agency the CCB/RC must complete the report in the CIRS and follow its local procedure for approval and submission of the report to DDD. The CCB/RC should ensure the initial description of the delay in *Primary Agency Comments* field are not edited from the critical incident report to permanently record the delay.
7. If the CCB/RC is unable to access the CIRS (e.g., the system is inoperative, security password failure, local data equipment failure, etc.) the CCB/RC must submit a report to DDD via fax (303-866-7470) utilizing the revised Critical Incident Fax Cover Sheet (attached) within the timelines specified above. The CCB/RC will be required to enter the critical incident into the CIRS once access to CIRS is re-established. The CCB/RC must also contact the Incident Manager (303-866-7450) to report any problems with accessing the CIRS.
8. DDD will ensure an Incident Manager is available each business day to review reports submitted in the CIRS and to respond to any questions from Reporting Agencies, CCBs or RCs. All reports in the CIRS will be reviewed within one (1) business day of submission to DDD.

If you or your staff have questions or concerns regarding the CIRS or the revised criteria for submitting critical incident reports, please contact Shari Repinski (shari.respinski@state.co.us or 303-866-7442), Kristi Esquibel (kristi.esquibel@state.co.us or 303-866-7951) or Sylvia Sablan (sylvia.sablan@state.co.us or 303-866-7144).

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