



Community Services for Every1, Inc.
180 Oak Street Buffalo, New York 14203

Title: Reporting and Recording Incidents and Events/Situations	Program: All
Effective Date: November 1, 2011	Audience: Choose an item.
Revised Date: 4/12/2016	References: 624.5, Administrative Memorandum - #2011-03, OPWDD Incident Management Page, 147, 148, Instructions, Administrative Memorandum Reporting Suspected Theft of Personal Property and/or Financial Exploitation, OPWDD 14 NYCRR Part 624 Part 625 Central Incident Management Protocol OPWDD
Author: Director of Quality Management	Pages: 4

PURPOSE:

The following policy is set forth to ensure all Reportable Incidents of Abuse/Neglect, Reportable Significant Incidents, Serious Notable Occurrences, Minor Notable Occurrences as identified in Part 624 regulations and Events & Situations as identified in Part 625 regulations are addressed and are processed properly on an OPWDD 147 or OPWDD 150 and within IRMA. The observer of an incident and their supervisor or designee are responsible for completing all phases of incident/alleged abuse to include, completing [forms](#), and making appropriate notifications including the notification of the Community Services Quality Assurance department to initiate the investigation process. Additionally, Quality Assurance is responsible for entering incident data into IRMA following receipt of an OPWDD 147/150. The purpose of the [147 and 150](#) is to identify and record a particular event. [OPWDD 14 NYCRR Part 624 and 625](#) regulations outline the definitions of each category of incidents.

DEFINITIONS:

Incident Report Management Application: IRMA is a web-based electronic application that provides a comprehensive system for oversight and monitoring of incident reporting. Quality Assurance completes all data entry into the system.

PROCEDURES:

Instruction for All Staff Completing Incident Reports	<p>At the time an incident is discovered or observed while an individual is receiving services (under the auspices) (Reportable Incidents of Abuse/Neglect, Reportable Significant Incidents, Serious Notable Occurrences, Minor Notable Occurrences) an OPWDD 147 form must be completed by the person who witnessed/discovered the event (or designee) within 24 hours. <u>All</u> incidents must be entered into a Therap GER. (Refer to Therap GER Guidelines)</p> <p>Reportable Incidents of Physical Abuse must be reported within 2 hours of occurrence or discovery and Reportable Incidents of Sexual Abuse, immediately upon occurrence or discovery. (Refer to Policy – Required Incident Notifications).</p>
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	<p>Preventative and Corrective Actions must be established for all Part 624 Incidents. (Refer to Policy – Abuse Prevention and or Correctives)</p> <p>At the time an incident is discovered while an individual is not receiving services (not under the auspices), i.e. person resides in the community and commits a crime an OPWDD 150 must be completed by the person who discovered the event/situation (or designee) within 24 hours. All events/situations must be entered into a Therap GER. (Refer to Therap GER Guidelines)</p> <p>Interventions and Actions must be taken for all events/situations in order to safeguard the person. Notifications to family, APS, CPS, law enforcement, Hospital, School, etc...shall be made. In addition, various actions such as, Assessing and monitoring the individual, Educating the individual about choices/options, Interview involved individuals and/or witnesses, Offering to make referral to appropriate service provider, Review records and other relevant documentation must occur.</p> <p>Staff can refer to OPWDD 14 NYCRR Part 624 and Part 625 regulations which outlines the definitions of each category of incidents and events/situations. In addition, staff can refer to the following guidance documents for a guide to properly file incidents and events/situations:</p> <ul style="list-style-type: none"> • Categories and Classifications of Incidents and Events/Situations with Notification Requirements • Incident Management Flow Chart • Incident Triage • Incident Definitions and Examples
<p>Supervisor or Designee</p>	<p>Some incidents may qualify as a “Significant or Critical Event,” such cases are:</p> <ul style="list-style-type: none"> • An event that would bring media attention; • An untoward death; • Or other egregious (extremely bad) situations. <p>Should a supervisor or Quality Assurance Staff identify that incident qualifies as a “Significant or Critical Event” they must make direct contact with someone at the DDSO according to the below guidelines:</p> <ul style="list-style-type: none"> • During normal business hours Monday – Friday this would best be accomplished by calling the agency’s Incident Compliance Officer at OPWDD at 716-608-2509. • After normal business hours or on weekends or holidays this would best be accomplished by contacting 1-888-479-6763.
<p>Instruction for Quality Assurance</p>	<p>Reportable Incidents of Abuse/Neglect and Significant Incidents are called into the Justice Center by mandated reporters. The Justice Center initiates IRMA data entry for</p>

these incidents. The QA department, once the incident has been received will complete the remaining data entry in the required IRMA Tabs.

All other incidents and events/situations that have been received by the Quality Assurance department must be initiated and entered into IRMA within 24 hours of occurrence or discovery.

However, if the incident cannot be entered into IRMA within 24 hours of occurrence or discovery due to weekend or holiday, the Quality Assurance department may defer data entry until no later than the close of the next business day. Business days are calendar days except for Saturday, Sunday and public holidays. This also includes days the agency reserves closed.

In reference to the [Administrative Memorandum on Reporting Suspected Theft of Personal Property and/or Financial Exploitation](#) all instances of suspected theft and financial exploitation that meet the criteria for an incident must be entered into IRMA. Minor notable occurrences must be entered within 48 hours of occurrence or discovery or by close of the next working day, whichever is later. Serious Notable Occurrences must be entered within 24 hours of occurrence or discovery. Staff should refer to [Categories and Classifications of Incidents and Events/Situations with Notification Requirements](#) [And Incident Definitions and Examples](#) for guidance.

OPWDD has designating the completion of specified fields in IRMA for Incidents and Events and Situations.

There are required elements of initial reporting using IRMA that Quality Assurance must complete according to the timeframes allowed. The following tabs are required:

- **Incident details tab** - This captures the incident information such as time date, location and involved parties. A full first and last name must always be entered in the Target of Allegation of Abuse category for all allegations of abuse when such information is known.
- **Consumer tab** - Indicate whether a crime may have been committed and whether law enforcement has been notified.
- **Initial findings tab** - The description should cover the “who,” “what,” “where,” “when,” and “how” of the incident.
- **Immediate protections** - A listing of all corrective/protective actions taken to ensure that the health and safety of individuals receiving services is maintained.
- **Physical findings tab** – Notes injuries and medical exam results as necessary.
- **Notification tab** - Various notifications are required following an incident/allegation of abuse and must be entered into IRMA, i.e. law enforcement.

OPWDD does not require all minor notable occurrences to be entered into IRMA; however, the agency has chosen to enter all minor notable occurrences into IRMA within 48 hours of occurrence or discovery or by close of the next working day.

For Reportable Incidents of Abuse/Neglect, Reportable Significant Incidents, Serious Notable Occurrences and all deaths:

Information obtained after the initial data entry must be entered into IRMA within a week (seven calendar days).

In the case of deaths, information that is necessary for the submission of the QCC-100 must be completed within 3 business days of the occurrence or discovery. The QCC-100 information must be submitted to the Justice Center through IRMA.

Quality Assurance Staff must also enter updates into IRMA at every thirty day marking period following Incident Review Committee Meetings. (Refer to [Policy Incident Review Committee](#))

Quality Assurance Staff must enter full investigations, including the findings and recommendations into IRMA before an incident can be CLOSED in IRMA.

Complete Investigations and investigatory materials (evidence) will be scanned and sent electronically through secure email to OPWDD for their review and forwarding to the Justice Center for final approvals.

Events and Situations are not formally investigated by Quality Assurance, nor do they require notification to the Justice Center (with the exception of Death). The Incident Review Committee will confirm that appropriate actions were set forth during the monthly meeting. Review will be tracked in meeting minutes.

Additional References:

[Categories and Classifications of Incidents and Events/Situations with Notification Requirements](#)

[Incident Management Flow Chart](#)

[Incident Triage](#)

[Incident Definitions and Examples](#)