

Community Recovery Services Incident Reporting Overview

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July 2021



Considerations

- This presentation is not intended to be a comprehensive review of the CRS Incident Reporting process.
- Refer to [F-00390i, Incident Report—Community Recovery Services—Instructions](#), for a comprehensive overview of this process.
- Use [F-00390, Incident Report—Community Recovery Services](#), to notify DHS of an incident.

Presentation overview

- Why should incidents be reported?
- What is the incident reporting process?
- What is the difference between a critical incident report and a non-critical incident report?
- Case examples
- What is the timeline and deadline to submit a critical incident or a non-critical incident report to DHS?

Why should incidents be reported?

Purpose of incident reporting

- **Monitor and ensure health and safety**

CRS is not monitored by the DHS Division of Quality Assurance, but has a high intensity of services.
- **Comply with Medicaid benefit requirement**

Per incident reporting instructions, “Failure to report incidents as required or in a timely manner may result in full or partial disallowance of funding claimed for subject of incident if determined that the participant’s safety was no assured...”
- **Offer support**
- **Collect data**

What is the incident reporting process?

Incident reporting form

- Use DHS form, [F-00390](#), or a previously approved Medicaid agency form.
- Reflects the incident that occurred, the action taken on the date of the incident, and steps to be implemented to decrease re-occurrence.

An incident report form must be completed for all consumers involved in an incident.


Who must report incidents?

Counties


Providers of community living supportive services, supported employment, and peer supports

Participants, guardians, or members of a participant's family


Who completes the report form?



- Counties (preferred)



- Agencies designated by the county (as long as the county is aware and has given approval)



- Participants, guardians, or members of the participant's family (not required or recommended to use the form)

How is an incident reported?

County or agencies designated by the county

Alleged or actual incident happens

Refer to incident reporting instructions, DHS form [F-00390i](#)

Determine if critical incident or a non-critical incident report

Complete DHS form [F-00390](#) or previously approved form

Submit form via email or fax to DHS CRS

How is an incident reported?

CRS participants(s), guardian(s), or member(s) of participant's family

Alleged or actual incident happens

Refer to incident reporting instructions, DHS form [F-00390i](#)

Determine if critical incident or a non-critical incident report

A verbal or written statement (DHS form [F-00390](#) not required nor recommended)

Submit via email, letter, verbal report via telephone, or in person to DHS, county, or agency designee to submit to DHS CRS

What is the difference between a critical incident report and a non-critical incident report?

What incidents must be reported?

Critical incidents

- Actual or alleged
- Unanticipated
- “Happening and present a current risk”
 - Active and urgent event or situation that involve immediate danger or risk to the CRS participant’s health, safety, and well-being.
- Designate as such on the incident reporting form
- Warrants immediate notification

Critical incident examples

- Abuse/neglect inflicted by others or suspected
- All deaths
- Unexpected emergency room visit, hospital admission, or urgent care visit
- Errors with medical or medication management that results in adverse reaction and need for medical attention
- Mishandling and misappropriation of person's funds or property
- Unanticipated absence to include wandering off or intentionally leaving

Critical incident examples

- Significant damage to property
- Unsafe or unsanitary environmental condition(s)
- Use of unapproved isolation, seclusion, or restraint
- Investigation and involvement of law enforcement
Overdose of nonprescription medication, misuse of prescription medications, use of illicit controlled substances or misuse of alcohol

Critical incident examples

- Actual arrest and incarceration of the participant or a provider serving a participant (while serving the role of a service provider or acts previously performed while in the role)
- Fire
- All suspected or confirmed suicide attempts

Case example

During mid-afternoon room checks, Susie was not in her bedroom or any other room at Bark CBRF. CBRF staff consulted, interviewed residents, and began to look for Susie. Law enforcement and Susie's guardian were contacted to help in the search. It had been about four hours since she was last seen. Susie was later discovered at a local laundromat. She admitted to leaving because she heard voices that she is unsafe at the CBRF and needed to find another place to live. This was the first time Susie unexpectedly left the CBRF seemingly in response to command hallucinations.

What incidents must be reported?

Non-critical incidents

- Actual or alleged
- Unanticipated
- Reportable situation that occurred in the past and no current risk exists, but at one time created a significant, immediate, or ongoing risk or serious harm to the physical health, mental health, safety, well-being, or continued presence of a participant.

Non-critical incident examples

- Abuse, if happened a year ago and the perpetrator is no longer present
- Death from a known, long-standing illness

Case example

Melissa has been receiving various treatment for lung cancer the past three years. Her CSP-CRS team has been monitoring her progress and has been updating her assessment with the details. At Melissa's annual review, it is reported she has experienced little progress in the treatment and her condition is worsening. End of life planning has been initiated and discussed. Melissa's physician has made a referral to a local in-home hospice agency at her request. Approximately three months later, Melissa passed away from lung cancer.

What is not an incident report?

- Known (information already included in CRS assessment or service plan) illness, condition, or behavior previously exhibited by the participant if it has occurred in the past and is anticipated to reoccur episodically.
- Episode(s) of challenging behavior that is already subject to a behavior intervention or crisis plan.

Not reportable versus reportable

- “For example, trips to an emergency room to deal with a serious, known, chronic medical condition are not reportable incidents, while a serious injury due to a car accident is and must be reported.”
- “An episode of challenging behavior that is already the subject of a behavior intervention plan is not a reportable incident, while the unanticipated use of restraints not called for in a plan due to behavior not previously observed is a reportable incident.”

Case example

Samuel (Sam) has a known allergy to aluminum-based deodorant since adolescence and has had multiple urgent care trips over the years to treat reoccurring reactions. On Monday, May 17, Sam was taken to urgent care by ABC AFH house manager because he was experiencing what appeared to be a persistent, itchy rash with inflammation in the area of his underarm. During his examination, Sam mentioned to the urgent care physician and house manager, “I must have bought the wrong deodorant when I went shopping last week. I have had this before...” It was determined by the treating physician Sam had an allergic reaction to deodorant and discharged from urgent care with several medications.

What is the timeline and deadline to submit a critical incident or a non-critical incident report to DHS?

Notification versus reporting

- Notification: Immediately providing information to CRS county (if applicable), then to DHS of the basic facts of the incident and the how it is being handled (**Immediate notification is usually in the form of a call or email.**)
- Reporting: Completion and submission of all or a portion of the incident reporting form (if DHS is not given all the information, it is expected an update to the original incident reporting form be completed within 30 days) to DHS by CRS county or with the approval of the county.

Critical incident

Agency designee to notify the county within 24 hours.

County or agency designee notification to DHS within three business days (generally 72 hours) of the initial notification.

Incident report form to be completed and submitted to DHS within seven days of the notification.

Information not available during initial notification may be submitted to DHS within 30 days of the incident or when the report is completed.
(typically referred to as an update to the critical incident report).

Non-Critical Incident

30 calendar days from the date the incident was discovered

Contact DHS CRS

DHSDCTS@dhs.wisconsin.gov

www.dhs.wisconsin.gov/crs