



Date: March 16, 2020

DMS Numbered Memo 2020-02

To: County Department of Human Services Directors
County Department of Social Services Directors
County Department of Community Services Program Directors
Children's Long-Term Supports Supervisors and Leads

From: Curtis Cunningham, Assistant Administrator
Long Term Benefits and Programs

A handwritten signature in black ink, appearing to read 'Curtis Cunningham'.

**Children's Long-Term Support Waiver Program and Children's Community Options
Program Incident Reporting**

Background

Incident resolution and prevention are essential to promote and support the health, safety, and welfare of children with disabilities. The Children's Long-Term Support (CLTS) Waiver Program and Children's Community Options Program (CCOP), hereafter referred to collectively as "CLTS programs," must have policies and systems in place to effectively identify, address, and seek to prevent risk to a child's health and safety. The policies and systems must also focus on engaging in active awareness and coordinating the efforts of all people who support the child in his or her home and community.

Incident reporting policy and requirements are based on [42 C.F.R. § 441.302\(a\)](#) and outlined in Chapter 9 of the Medicaid Home and Community-Based Services Waiver Manual for the CLTS Waiver Program ([CLTS Waiver Program Manual](#)). The Wisconsin Department of Health Services (DHS) assigns and shares responsibility for meeting these requirements with local county waiver agencies (CWAs) administering CLTS programs, service providers, guardians, and family members.

Purpose

This memo establishes updated requirements for reporting incidents involving CLTS programs participants through a new [Children's Incident Tracking and Reporting \(CITR\) System](#).

Overview

Incident reporting is part of a larger incident management process intended to minimize preventable incidents from occurring and effectively resolve incidents when they do occur. The CITR System will support optimal incident reporting, tracking, and data analysis. This can help CWAs issue timely incident reports, recognize trends and patterns, and develop protocols to minimize the recurrence of incidents.

Key County Waiver Agency Responsibilities

- Ensure, as required in the support and service coordination (SSC) service description in Chapter 4 of the [CLTS Waiver Program Manual](#), that all SSCs complete the [Mandated Reporter Online Training](#)

created by the Wisconsin Child Welfare Professional Development System and follow procedures for mandated reporting of abuse and neglect ([Wis. Stat. § 48.981\(3\)](#)).

- Maintain awareness of a child's life situation through regular communication with the child's family and providers.
- Identify vulnerable children and provide a heightened level of coordination and communication with all people who support those children.
- Work with the child and family to identify aspects of the child's life that pose risk to the child's health and safety. Implement supports and services to address those risks and promote a safe environment.
- Report all cases of suspected child abuse to local child protective services or law enforcement, following the procedures for mandated reporting of abuse and neglect, [Wis. Stat. § 48.981\(3\)](#), immediately upon receipt of the information. Reporting incidents to DHS does not relieve providers or CWAs of any other health and safety responsibility or of reporting obligations to appropriate regulatory or enforcement agencies.
- Submit notification of an incident according to Chapter 9 of the [CLTS Waiver Program Manual](#) for both programs to DHS via the CITR System. DHS reviews the information to ensure that steps have been taken to protect the child.
- Immediately assess risks following any incident. Implement interventions to remediate any ongoing risk of harm.
- Submit a finalized incident report, which DHS reviews to determine incident closure.

Additional components of this incident management process are described in Chapter 9 of the [CLTS Waiver Program Manual](#).

Incident Reporting Form and Instructions

To date, CWAs have notified and reported incidents to DHS through submitting an Incident Reporting – Medicaid Waiver Programs form, F-22541. With the implementation of the CITR System effective March 30, 2020, DHS will require CWAs to notify and report incidents directly through the [CITR System](#).

CITR User Guide

The guide for using the online incident reporting system can be accessed at <https://www.dhs.wisconsin.gov/publications/p02617.pdf>.

Memo Summary and Effective Dates

This memo replaces incident reporting policy or guidance described in the Incident Reporting– Medicaid Waiver Programs—Instructions ([F-22541I](#)) and supersedes any contradictory incident reporting requirements in Chapter 6 of the Children's Community Options Program Procedures Guide ([P-01780](#)). Refer to Chapter 9 of the [CLTS Waiver Program Manual](#) for additional guidance regarding the incident management process.

Following the implementation of the CITR System, incidents involving participants in the CLTS Waiver Program and/or CCOP must be reported directly through [CITR](#), and DHS will no longer permit reporting incidents through DHS form F-22541 submissions.

Assistance

CWAs are to direct questions about incident reporting requirements to [technical assistance lead](#), and to contact the CITR Help Desk for technical assistance with CITR:

- Email (Include “CITR” or “Incident Reporting” in the subject line):
VEDSLTCIESHELP@wisconsin.gov
- Phone: (608)-224-6007

MEMO WEBSITE:

<https://www.dhs.wisconsin.gov/dltc/memos/index.htm>