POLICY AND PROCEDURES: INCIDENT REPORTING

Policy
Imagine! will ensure that incident reports are written, reported, and addressed in accordance with waiver and regulation.

1. Employee/Provider Training
All Program Approved Service Agencies (PASAs) providing services and supports to Imagine! consumers, will ensure their employees and providers receive training on incident reporting prior to working unsupervised with individuals receiving services. The scope of training should include, at a minimum:

- How to identify an incident,
- When an incident report is required,
- How and when an incident is to be reported,
- How to complete an incident report,
- How the report is to be routed.

2. Writing Incident Reports
Each Program Approved Service Agency is required to write incident reports for all incident types as identified by regulation. Types of incidents requiring reporting include:

- Injury to person receiving services
- Lost or missing person receiving services
- Medical Emergencies
- Hospitalizations
- Death of person receiving services
- Errors in medication administration
- Unusual reports or actions
- Allegations of M/A/N/E
- Use of Safety Control Procedures
- Use of Emergency Control Procedures
- Stolen property

Incident reports will include all information as required by rule, and at a minimum will include:

- The name of the person reporting the incident
- The name of the person receiving services who was involved in the incident
- If more than one person was involved in the incident, separate incident reports will be written for each person to ensure confidentiality.
- The name(s) of persons involved or witnessing the incident. If the witness is an individual in services, the author of the incident report will ensure confidentiality of the witness.
- Type of incident
- An objective description of the incident
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3. **Timelines for Writing and Routing Incident Reports**

In general, incident reports are to be written as soon as is possible after an incident is reported or witnessed. Incident reports are to be reviewed and routed to the Imagine! Case Manager within seventy-two (72) hours.

If an incident involves an allegation of mistreatment, abuse, neglect or exploitation, injuries which require emergency medical treatment or result in hospitalization or death, or meets the definition of a Critical Incident (see below) the incident is to be reported to the agency administrator immediately and the reporting agency shall ensure that the Case Manager is notified in writing within 24 hours.

The use of an Emergency Control Procedure is to be documented in an incident report within 24 hours and routed to the Case Manager within 72 hours.

**Reporting Timelines Quick Reference**

<table>
<thead>
<tr>
<th>Type of Incident</th>
<th>Verbal Report</th>
<th>Written Report</th>
<th>Send to CM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Most incidents</td>
<td>N/A</td>
<td>24-72 hours; as soon as is possible</td>
<td>Within 72 hours</td>
</tr>
<tr>
<td>Critical Incidents and Mistreatment</td>
<td>Immediately to agency administrator</td>
<td>Within 24 hours</td>
<td>Within 24 hours</td>
</tr>
<tr>
<td>Emergency Control Procedure</td>
<td>N/A</td>
<td>Within 24 hours</td>
<td>Within 72 hours</td>
</tr>
<tr>
<td>Safety Control Procedure</td>
<td>N/A</td>
<td>24-72 hours; as soon as is possible</td>
<td>Within 72 hours</td>
</tr>
</tbody>
</table>

4. **Critical Incidents and Occurrences**

When an incident meets criteria for Critical Incidents, as defined in the HCBS waivers, the reporting agency shall ensure the Case Manager is notified within 24 hours to ensure timely reporting to Health Care Policy and Financing (HCPF), as required. Designated Imagine! staff will report the incident to HCPF within 24 hours (business day) for HCBS-SLS and HCBS-DD waivers, and by noon (business day) for the HCBS-CES waiver, from the time the incident is reported to Imagine!.

When an incident meets the definition of an occurrence, for programs licensed by the Colorado Department of Public Health and Environment (CDPHE), the licensed entity will be responsible for all reporting and follow-up directly with the Department. Case Managers should be notified when an occurrence has been submitted, if notification has not been made through a required incident report.
5. **Routing of Incident Reports**

Incident reports should be reviewed by a variety of individuals both within the organization and outside of the organization. Each PASA shall determine who will review reports internally.

Reports written by a day program are to be copied to the individual’s residential program. Critical incidents impacting health, safety, and behavior, which are written by the individual’s residential program, are to be copied to the individual’s day program.

Guardians of individuals in services will be notified of incidents by the reporting PASA.

All incident reports are to be routed to the Case Management department of Imagine!. Reports will be reviewed by the individual’s Case Manager, Case Management supervisors and filed in the master record.

All incidents, which require investigation, will be routed to the Imagine! Case Management Supervisor(s) at Imagine! following the Imagine! policies and procedures for reporting and investigating mistreatment.

6. **Human Rights Committee (HRC)**

The Case Management liaisons are responsible for ensuring that the HRC reviews incident reports for the use of Emergency or Safety Control Procedures as well as incidents, which have been investigated by Imagine! or service agencies.

Review and recommendations from HRC will be recorded and distributed to appropriate parties in accordance with the Imagine! Human Rights Committee procedures.

7. **Follow-up to Incident Reports**

PASA management, the Case Manager, Case Management supervisors and/or the Human Rights Committee may request follow-up to an incident report. Documentation of follow-up requested and follow-up completed should be completed on the original incident report, appropriate data systems or in monthly or quarterly notes. In accordance with rules, if follow-up is not directly documented on the incident report, the report should indicate where follow-up is to be found.

If the incident has been reported as a critical incident to Health Care Policy and Financing, follow-up may be requested. Follow-up requests will be sent to the individual’s designated Case Manager. All follow-up for critical incident reports will be entered into the BUS.

Follow-up documentation relating to investigations is to be maintained in a separate administration file by the PASA. Pertinent information regarding investigations is to be forwarded to Imagine! in accordance with investigation policies and records and will be maintained separate from the individual’s main record.

8. **Imagine! Trend Review and Analysis**

Imagine! will complete semi-annual reviews and analyses of incident reports. The reviews will include a 10%-15% sample of incident reports received or written by Case Managers, for PASAs providing services to ten or more Imagine! individuals. The review will include timeliness of reporting and quality of content of the report. PASA Incident Trend analysis reports may also be requested by Imagine! as part of its Quality Assurance process.

Critical incident report data will be reviewed quarterly. Trend analysis will be completed and reported in accordance with the HCPF contract. Information from the analyses will be shared with Imagine! Case Management and/or PASAs. When ongoing trends are noted for a PASA, the PASA may be requested to submit a Plan of Correction.