

Incident Management Update Regarding Individual -to- Individual Abuse and Serious Injury

ODP Announcement 21-039

AUDIENCE:

All stakeholders and incident reporters

PURPOSE:

To inform providers that on July 1, 2021, an investigation will not be mandatory and need to be completed by a Department-certified Investigator for the following incidents when reported in the Enterprise Incident Management (EIM) system:

- Serious Injury-Injury Accidental
- Abuse-Physical (when the target is another individual recipient of service)
- Abuse-Psychological (when the target is another individual recipient of service)

The EIM system will not require a Department-certified Investigator to be assigned. Providers will have the ability to proceed with an optional investigation and assign a Department-certified Investigator if desired.

DISCUSSION:

On March 1, 2021, ODP issued Incident Management (IM) Bulletin 00-21-02 which contained an effective date of July 1, 2021. Outlined in IM Bulletin are the operating procedures and directions for the incident management process, including the uniform practices for reporting of incidents and investigation of incidents.

In response to the current national healthcare workforce crisis effecting a majority of provider agencies within the ODP network, ODP will not be requiring incidents of “*abuse to an individual by another individual*” and “*injury requiring treatment beyond first aid as a result of an accidental injury*” to be investigated by a Department Certified investigator, in accordance with §6100.402. However, the reporting agency may want to implement these changes now as it is best practice to get familiar with the new requirements contained in the bulletin. Additionally, ODP or it’s delegated management review entities may require an investigation to be completed by a Department-certified Investigator. Guidance and review criteria will be provided to management reviewers.

ODP will continue to evaluate the impacts of this delay. ODP will also provide notification to incident reporting entities six-months prior to when system changes will become effective that require these incidents to be investigated by a Department-certified investigator.


Individual -to- Individual Abuse


In 55 Pa. Code Chapter §6000, “*Individual – to – Individual Abuse*” is a primary category that is used to report in the Enterprise Incident Management (EIM) system. This is a reportable event that happens from an interaction between one individual receiving services and another individual receiving services resulting in an allegation or actual occurrence of abuse. After July 1, 2021, EIM will continue to allow providers to report Individual-to-Individual abuse within this primary category with the current standards in Chapter §6000. ODP expects providers to transition from the requirements and reporting of “*Individual-to-Individual Abuse*” in EIM to reporting any kind of abuse to an individual, regardless of who the target is (even by another individual) through reporting in EIM with the primary category of “*Abuse*”. Please refer to the Incident Management Bulletin 00-21-02 for new guidance on how to report “*Abuse*” for this type of incident.


Please note: Individual-to Individual abuse that involves sexual abuse, will be required to be reported in EIM as “*Sexual Abuse*” starting on July 1, 2021. When the target of the investigation is another individual receiving services, this will be identified using the target

identifier screens in EIM. **There is no delay for reporting and investigating incidents of sexual abuse.** These incidents currently require an investigation to be completed by Department -certified investigation and this requirement will continue after July 1, 2021. Additionally, the secondary categories of verbal abuse and psychological abuse have been combined; therefore “verbal” is no longer a secondary category listed in the EIM system. The below screenshot from EIM is will be what is displayed and available on July 1, 2021.



Incident Classification

Discovery Date and Time: ★ MM/DD/YYYY HH:MM 

Primary Category: ★ Individual To Individual Abuse 

Primary Category Date Occurred: ★ MM/DD/YYYY 

Secondary Category: ★

Select	Secondary Category	Date Occurred
<input type="checkbox"/>	Physical	MM/DD/YYYY 
<input type="checkbox"/>	Psychological	MM/DD/YYYY 

Injury Requiring Treatment Beyond First Aid

In 55 Pa. Code §Chapter 6000, “*Injury Requiring Treatment Beyond First Aid*” is a primary category that is currently used to report in the EIM system. Starting July 1, 2021 this primary category is changing to “*Serious Injury*” with a secondary category of “*Injury Accidental*” which is to be indicated when the injury is the result of an accident. The requirement to have a Department Certified Investigator conduct the investigation for accidental injuries when treatment beyond first was necessary, will also continue to be delayed. Please refer to the Incident Management Bulletin 00-21-02 for new guidance on how to report “*Serious Injury*”. As stated above, although not mandatory the reporting agency may want to

implement these changes now as it is best practice to get familiar with the new requirements contained in the bulletin.

The below screenshot from EIM is will be what is displayed and available on July 1, 2021. As shown, an investigation is not required, and will be optional. However, reporting entities may select to proceed with an investigation if desired.

, 2021

Incident Classification

Discovery Date and Time:

Primary Category:

Primary Category Date Occurred:

Secondary Category:

Select	Secondary Category	Date Occurred
<input type="checkbox"/>	Choking	<input type="text" value="MM/DD/YYYY"/>
<input checked="" type="checkbox"/>	Injury Accidental	<input type="text" value="MM/DD/YYYY"/>
<input type="checkbox"/>	Injury Self Inflicted	<input type="text" value="MM/DD/YYYY"/>
<input type="checkbox"/>	Injury Unexplained	<input type="text" value="MM/DD/YYYY"/>
<input type="checkbox"/>	Medical Equipment/Failure/Malfunction	<input type="text" value="MM/DD/YYYY"/>
<input type="checkbox"/>	Pressure Injury (Decubiti, Pressure Ulcer, Pressure Sore, Bedsore)	<input type="text" value="MM/DD/YYYY"/>

Investigation Required? [DETERMINE IF AN INVESTIGATION IS REQUIRED](#)

Proceed with Investigation?

Assigned Certified Investigator:

As an important reminder and to reinforce existing incident oversight activities, ODP or its delegated management review entities may require an investigation to be completed by a Department-Certified Investigator for any reportable incident outlined in Incident Management Bulletin 00-21-02. Therefore, to assure ODP and other management review entities that incidents are being reported and managed in accordance with policy, it is imperative that reporting entities provide thorough details in the *Incident Description* and *Actions Taken to Protect Health, Safety, and Rights* pages of the EIM incident first section.

Incident Description

Please describe in detail exactly what happened during the incident, including dates, times, and all people involved including staff. Include all relevant details prior to, during, and after the incident. Indicate the current status of the Individual: ★

Actions Taken To Protect Health, Safety, and Rights

Please describe the actions taken to protect the individual (Describe administrative, health/safety, treatment and targeted individual actions to address the incident to date including supports and/or services offered): ★

Additionally, specific to incidents of *Serious Injury-Injury Accidental* where treatment beyond first aid was provided in an urgent care setting, emergency room, or other healthcare setting, **ODP will be expecting healthcare treatment summary documentation to be scanned and uploaded into the EIM as part of the Incident First Section submission.** This will allow incident management reviewers to understand the nature and extent of injuries and to confirm that appropriate response and health and safety protections for the individual have been put in place. This information will be used determine that the incident is classified correctly, that an investigation is not mandatory, and that additional actions are not necessary.

The below screenshots display the EIM *Document Upload* capabilities that exist currently and how to access the Document Upload screen.

Incident Detail

ID: [92350](#) Version: 9 Type: Individual Incident Primary Category: Serious Injury Status: Open

Individual: PGG_WRF Provider:
MCI: 530386810 Discovery Date:

Collapse Details

	Document Name	Status	Due Date	Action	Created Date	Created By	Last Edit Date	Edited By	Report Extension	Print
+	Incident First Section	In Progress		VALIDATE SUBMIT	5/13/2021	Three, Provider	5/13/2021	Three, Provider		<input type="checkbox"/>

PRINT SUMMARY REASSIGN POINT PERSON MARK AS CONFIDENTIAL LINK TO INCIDENTS / COMPLAINTS DOCUMENT UPLOAD DELETE

Document Upload

ID: [92350](#) Version: 9 Type: Individual Incident Primary Category: Serious Injury Status: Open

Individual: [PCG_WRF](#)
Provider:

MCI: [530386810](#)
Discovery Date:

[Expand Details](#) ▼

Document Type: ★

File Name: ★ ✓ Done

ER Visit Treatment Summary F...

212.09 KB

Allowed file types are .pdf, .doc, .docx, .xls, and .xlsx
Maximum allowed file size is 5MB

UNDO CHANGES
UPLOAD +

CONTACT:

For questions regarding this communication, please contact your ODP Regional Office or the RA-impolicy@pa.gov email account.



REMINDER

EIM Training regarding system changes due to Chapter 6100 regulations and the revised Incident Management Bulletin will begin early June and will be announced shortly. Stay tuned for communications regarding Recorded Webcasts and registration for the Live Question and Answer sessions.