

Administrative Entities' Use of Data for Quality Management and Risk Management Activities

ODP Announcement 24-052

AUDIENCE:

Administrative Entities (AEs)

PURPOSE:

The purpose of this communication is to clarify the Office of Developmental Programs' (ODP's) expectations of Administrative Entities' (AEs') use of data for quality management and risk management activities, in accordance with the AE Operating Agreement.

DISCUSSION:

ODP's Quality Management (QM) Certification program defines QM as *active* oversight of all quality assurance (QA) and quality improvement (QI) activities required to achieve and maintain a desired level of excellence. QA relates to ensuring compliance, while QI relates to making things better for the people we serve (person-centered).

ODP also defines risk as the presence of a factor that increases the likelihood of an adverse/ undesirable outcome (e.g., loss of life, injury, financial loss, etc.) to an individual and/or an entity. Each risk factor carries the possibility of an undesirable consequence, as well as the likelihood that it will occur. Additionally, ODP defines risk management (RM) as the decisions made about a risk factor that aim at preventing harm, and it involves identifying, evaluating, and prioritizing identified risks, and then

applying resources, in a coordinated effort to avoid, minimize, control, and monitor the probability or impact of the adverse outcome. RM activities can be proactive and reactive.

In Section 10 of ODP's AE Operating Agreement, ODP outlines the AE's responsibilities related to use of data to enhance quality, particularly through the development and implementation of a QM plan, and through functions of the AE's QM Point Person, who is strongly recommended to be ODP QM certified, so that they are fully equipped for the role of managing quality and advancing QI activities required under the AE Operating Agreement.

In addition, it is strongly recommended that the AE has a policy in place that outlines how it uses data to enhance and improve quality, by way of ongoing data monitoring and analysis practices and QM planning. This policy should include, at a minimum, 1) the frequency of data review and analysis, 2) what demographic data is used, 3) establishment of performance measures using Department priorities, 4) the use of data in DocuShare provided by the Department, as well as the use of data in current or succeeding systems, such as the Home and Community Services Information System (HCSIS), the Health Risk Screening Tool (HRST) and the Enterprise Incident Management (EIM) system, 5) monitoring for data integrity, racial equity and equitable access to services, and 6) use of dashboards and data reports made available by the Department. Having a policy in place that includes all of these elements helps the AE to ensure clear understanding of expectations, by all AE staff, related to QM and use of data in meeting the AE Operating Agreement expectations and requirements.

Section 10.1 of the AE Operating Agreement addresses QM plan requirements and states:

The AE shall have a written QM Plan that implements the Department's QM Strategy related to the methodology, accountability, responsibility, and ongoing review of QM activities. The QM Plan shall include the Everyday Lives recommendations and focus on published ODP priorities. The AE shall review and analyze data and performance over time, direction from the Department regarding priorities, and any feedback received from the Department to improve internal QM processes and build or refine objectives for the QM Plan. The AE shall maintain documentation of the process used to select these opportunities for improvement. The AE shall provide evidence of implementation of its QM Plan.

The QM Plan shall contain:

1. Measurable objectives that relate to the identified goals and outcomes.
2. Performance measures that support each objective.
3. The data source for each performance measure.
4. Provisions to provide for the collaboration with system partners in improving local services and supports.
5. The person or persons responsible for QM Plan improvement.
6. Objectives aligned with the Everyday Lives principles and strategies.

To provide additional guidance for AE QM plan requirements and ODP's expectations, ODP expects AEs to:

- Have a written QM Plan that implements the Department's QM Strategy related to the methodology, accountability, responsibility, and ongoing review of QM activities.
- Routinely review and analyze data and performance over time, as well as any direction or feedback provided by the Department regarding priorities and/or opportunities to improve the AE's internal QM processes and/or plans.

- Use routine data monitoring and data analysis to identify quality improvement (QI) initiatives considering Everyday Lives recommendations, person-centered outcomes data, and ODP priorities in making decisions around QI initiatives.
- Use routine data monitoring and analysis for measuring progress on chosen QI initiatives.
- Maintain documentation of the process used to select these opportunities for improvement and provide evidence of implementation of its QM Plan.

ODP's QM Certification program teaches that an entity's (hereafter referred to as the AE's) QM Plan should include:

- Specific area(s) that the AE has chosen to improve, that align with person-centered outcomes and [Everyday Lives principles and strategies](#).
- Measurable target objectives the AE is aiming to reach, within an identified timeframe, and that relate to the identified goal(s) and outcomes(s).
- An Action Plan that includes action steps to be taken to achieve target objectives, including provisions for collaboration with system partners to improve local services and supports.
- Performance measures for each target objective that will be used to establish baselines, set benchmarks, and evaluate whether improvement is occurring.
- The data source for each performance measure.
- The title of the person responsible for the QM Plan.
- The title of the person(s) responsible for each action step on the Action Plan.

A significant piece of QM, particularly in the ODP system is RM, and a significant piece of RM is incident management (IM). This is visually represented below.

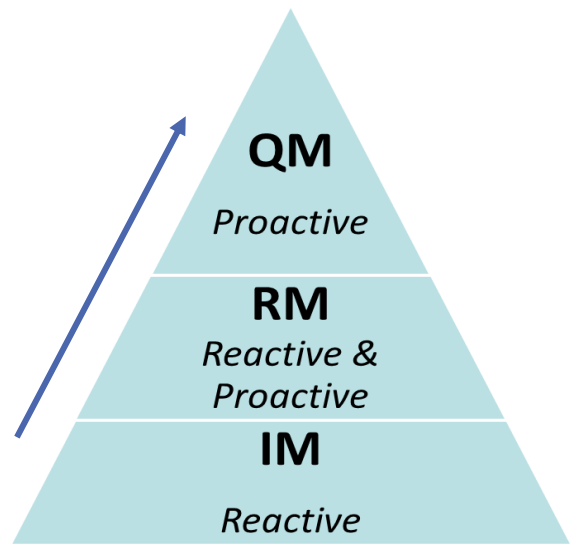


Another way to look at the QM/RM/IM connection is to think about it as moving from being reactive in IM, which is about minimizing impact *after* an incident occurs, to also being proactive, which is about using data to enhance the quality of services/supports by preventing and/or decreasing the frequency and severity of adverse incidents. In the long run, this should reduce the severity and volume of incidents that happen to individuals and thus the number of incidents that require a reaction. This concept is visually represented below.

QM = Addressing areas where improvement is needed to proactively avoid or reduce likelihood or severity of future incidents.

RM = Monitoring/analyzing/trending data to identify risks to act on; QI opportunities can be identified.

IM = Reacting to adverse incidents – includes incident reporting and data collection.



While ODP expects that QM/RM/IM functions are occurring at the Supports Coordination Organization (SCO) and provider levels of the system, ODP also requires and expects that AEs are actively engaging in RM and QM activities, as outlined in the IM Bulletin 00-21-02 (section XII d), using Enterprise Incident Management (EIM) data and dashboards available to them.

ODP expects that the AE will conduct routine data monitoring (e.g., monthly) and periodic data analysis (e.g., quarterly, and annually), by individual, service location, and provider entity to identify risks that require intervention to avoid a crisis or adverse outcome. The AE must document findings from their analyses in writing, including any actions that need to be taken. The AE's analyses must include, but are not limited to:

- Compliance with timeframes for reporting, investigation, and finalization of incidents.
- Evaluation of the circumstances and frequency of the use of restraints.
- Evaluation of the circumstances and frequency of medication errors.

The AE is expected to help mitigate all situations identified as potential risks to the health and welfare of individuals. ODP conducts oversight activities through the Quality Assessment & Improvement (QA&I) process to ensure monitoring and analysis of IM data is conducted, and to evaluate the quality of AE quality management plans.

Please refer to ODP's [QM Landing Page](#) on MyODP for additional QM resources, including ODP's QM Certification Handbook, and [QM Templates, Tools, and Spotlights](#). For additional information on IM and RM, please refer to IM Bulletin 00-21-02. ODP will be offering an upcoming training on AE's use of data for QM and RM, so be on the lookout for it.

CONTACT:

Questions about this communication should be directed to your regional office Quality Management and/or Risk Management leads.