Serious Reportable Events

Healthy Connections PRIME

The South Carolina Department of Health and Human Services (SCDHHS) is issuing clarifying guidance on Serious Reportable Events (SREs) to provide direction to the Medicare-Medicaid plans (MMPs) concerning critical incidents involving members receiving services under the Healthy Connections Prime program.

The intent is to provide a set of member protections to the MMPs to ensure that the health, safety, and welfare of the members are being met. The MMPs are required to:

- Thoroughly investigate each incident and provide a detailed report documenting the resolution
- In the case of SREs involving a facility, conduct a quality of care investigation to determine if the SRE was related to quality of care
- Report to the State if a quality of care issue leads to adverse action against the provider including, but not limited to non-payment, suspension or termination of contract.

SCDHHS will oversee the MMPs to assure compliance with federal and state requirements and monitor the reporting and resolution of critical incidents.

What is a Serious Reportable Event (SRE)?

SREs are defined as incidents involving death or serious harm to a patient resulting from a lapse or error in a healthcare facility. SREs are commonly referred to as "never events." Serious Reportable Events include, but are not limited to:

- Deaths (unexpected, suicide, or homicide);
- Falls (resulting in death, injury requiring hospitalization, injury that will result in permanent loss of function);
- **Infectious disease outbreaks;
- **Pressure ulcers that are unstageable or are Staged III and IV;
- Traumatic injuries (including third degree burns over more than ten percent(10%) of the body) that result in death, require hospitalization, or result in a loss of function;
- Restraints, both chemical and physical, use that results in death, hospitalization, or loss of function;
- All elopements in which a member with a documented cognitive deficit is missing for twenty-four (24) hours or more;
- Suspected physical, mental or sexual abuse and/or neglect; and
- Media-related event. Any report of which the MMP is aware that presents a potential or harmful characterization of the MMP or Demonstration.

Note: Infectious disease outbreaks and pressure ulcers are specific items under Healthy Connections Prime. All others are commonly reported items within Community Long Term Care.

How should MMPs handle SREs?

The MMP must report all SREs to SCDHHS and the Contract Management Team. If a case involving SREs is received by the MMP, the following events must occur:

1. **Document in Phoenix.** The MMP must document all SREs within Phoenix, SCDHHS's automated case management system, regardless of whether the member is a CLTC Waiver Participant or a non-waiver individual by the <u>next business day</u> from the notification. If the SRE has already been reported by CLTC (i.e. Waiver Case Manager), an additional SRE entry is not required unless to capture Healthy Connections Prime specific events (Infectious Disease, Pressure Ulcer).

2. **Notify SCDHHS and the CMT.** The MMPs must provide written notification to SCDHHS and the Contract Management Team (CMT) of the SRE and the outcome of its resolution.
   a. MMPs will send the information to SCDHHS at prime@scdhhs.gov.
   b. SCDHHS will confirm receipt and notify their internal SRE team to review the report, provide feedback to the MMP, and ensure all SREs are reported to the proper regulatory entity, when appropriate.
   c. SCDHHS's internal SRE team will meeting on a monthly basis to discuss any new or on-going critical incidents until the case(s) has been resolved. SCDHHS's internal SRE team will report the SREs to its Quality Assurance Task Force.
   d. MMPs will send information to the CMT via the CMT Operations Report and include all identified SREs in the biweekly updates of the CMT Operations Report. At a minimum, the MMPs must provide updates on each SRE monthly until the case is resolved and closed. The MMPs' SRE records documented in Phoenix must agree with those reported to SCDHHS and CMS on the Healthy Connections Prime CMT Operations Report.

SCDHHS and CMS will monitor the SREs. SRE data will be used for quality improvement activities, accountability, public reporting, and improving the overall health and welfare of members.

How should MMPs handle SREs?

Phoenix users can document SREs via the "Critical Incident" module in Phoenix. The following pages contain information relating to the "Critical Incident" module. Please note that Internet Explorer is not a supported web browser for Phoenix. Google Chrome or Firefox should be used for Phoenix.

- **<u>Do</u> submit to Phoenix Critical Incidents Module:** Critical Incidents related to the participants, providers, and CLTC staff (i.e. never events as noted above such as abuse/neglect of a client, inappropriate interaction with CLTC state worker(s))

- **<u>Do</u> submit to Phoenix Complaints Module:** Issues related to providers and/or service delivery only.

- **<u>Don't</u> submit to Phoenix Critical Incidents Module:** Technical issues related to Phoenix/Care Call malfunctioning, Provider billing issues, disagreements with CLTC policy and procedures, etc. should <u>not</u> be reported as a Critical Incident or SRE in Phoenix
  o Technical issues with Phoenix should be reported using "Report a Problem" button at the bottom of each Phoenix screen
  o Any other issues should be reported using the "Care Call- Distribution@scdhhs.gov" or "Provider-Distribution@scdhhs.gov" group email.

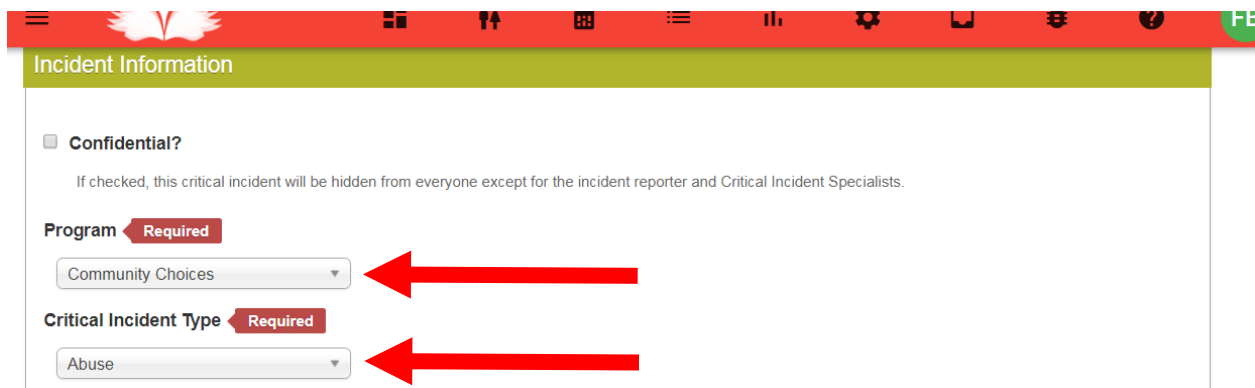## How do MMPs submit a Critical Incident/SRE to Phoenix?

1. Click "**Critical Incident**" from the member carousel. You may have to arrow left or right to see this.
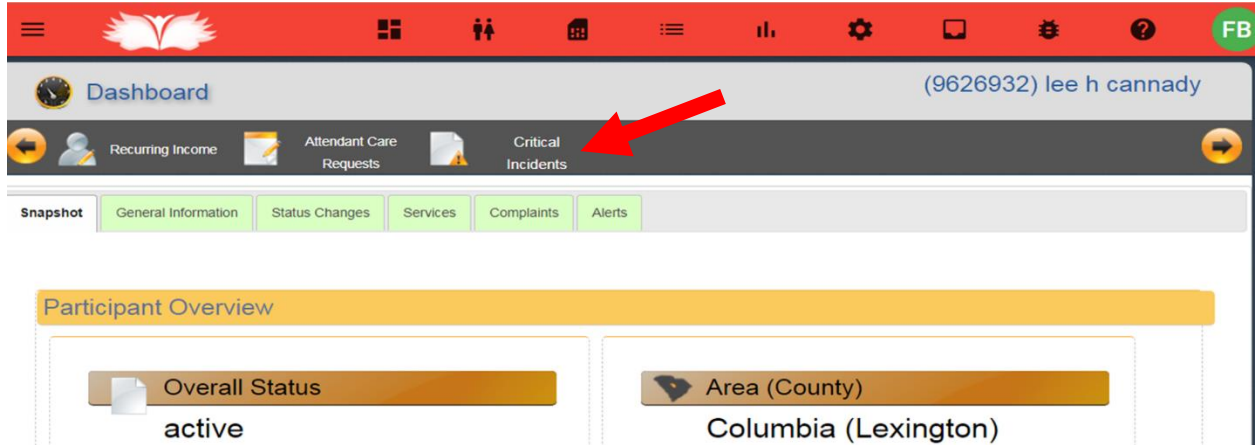
2. Select new Critical Incident
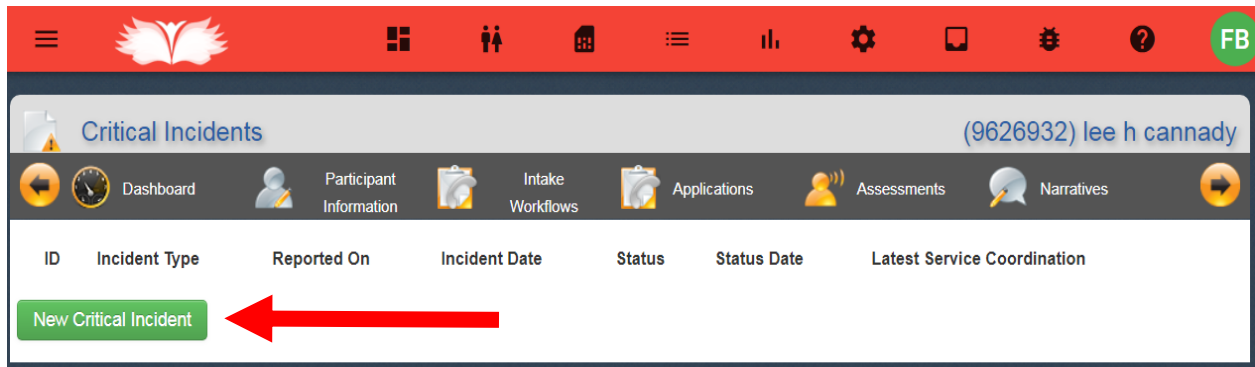
3. Select Critical Incident/SRE program, type, date, and source of information

Do not click the confidential box as this will block all parties except DHHS from viewing coordination notes. Only programs with active applications for the participant will show.

3. Select Critical Incident/SRE program, type, date, & source of information – *Continued*

Incident Date is defined as the date of occurrence, not date that occurrence is being reported.

Do not include any Protected Health Information (PHI) in the Critical Incident/SRE such as (Participant's name, DOB, Address, SSN, or Medicaid/Medicare number.

After you click on "Save", a notification email will be sent to the User and Central Office.

Viewing and Editing a complaint/SRE

1. Go to Participant's dashboard then click "Critical Incidents" via the carousel.
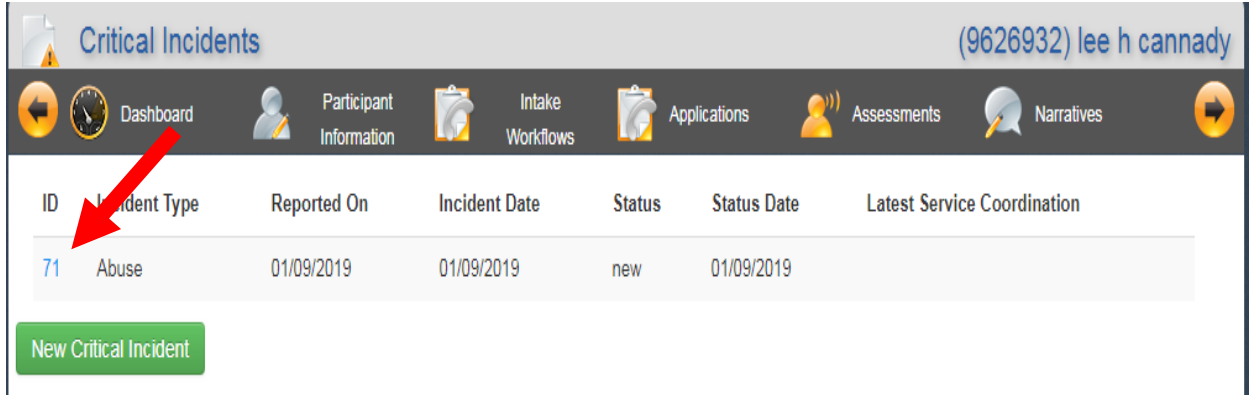
Phoenix will automatically assign an identification number to the reported incident. Current status of all reported incidents will be shown here.

2. Service Coordination Follow Up

Note: CMs are required to follow up monthly with APS so much of this section may be informational only to the MMP except for follow up requirements for Healthy Connections Prime specific items as noted in the description above.
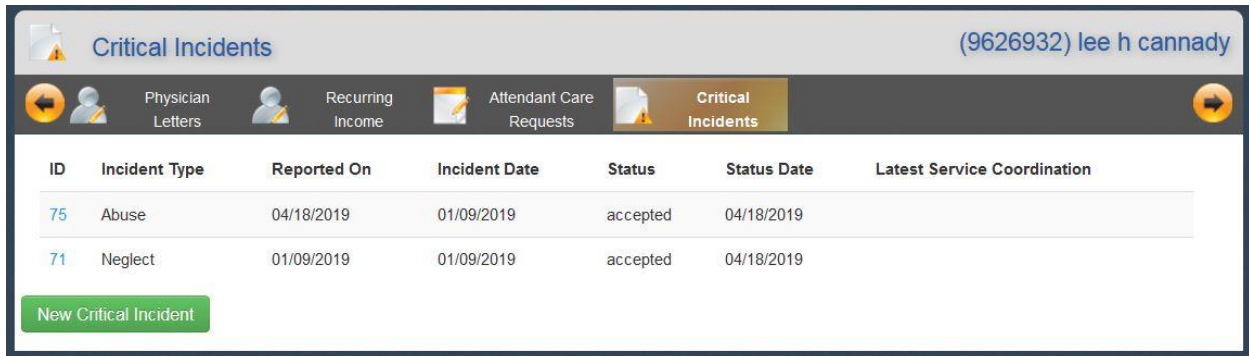
Following a service coordination attempt, Case Managers enter pertinent information in the <u>critical incident itself rather than the participant narrative</u>. This input should occur whether the contact attempt is <u>successful</u> or <u>unsuccessful.</u> MMPs must follow this same practice for Healthy Connections Prime specific events.

1. Critical Incident/SRE Updates

Choose the incident being updated.

Select 'Record a Service Coordination Attempt'

If case managers have successfully completed a service coordination, check-off the appropriate box. Then, enter pertinent details in the Additional Information box, and Save.

If service coordination attempt was unsuccessful, leave the contact box unchecked, enter any pertinent details in the Additional Information box ("CM left voice mail for APS worker requesting returned call 4/17/19," for example) and Save.