

Incident Reporting and Management System (IRAMS) User Introduction

For Health Homes (HH) and Care Management Agencies (CMA)

Agenda

- IRAMS Purpose and Oversight
- Responsibilities and Reporting Requirements
- Accessing IRAMS
 - Who should use IRAMS?
 - Accessing the System
- IRAMS Homepage Overview
- Reporting an Issue (Incident or Complaint/Grievance)
 - Member Connections
 - Complaint Information
 - Issue Details
 - Submitting an Issue
- IRAMS Reporting
- Live Demo



Incident Reporting & Management System (IRAMS) Purpose

- The NEW Incident Reporting and Management System (IRAMS) will take the place of current paper-based processes for Health Home Serving Adults (HHSA) and Health Home Serving Children (HHSC)
- The HHs are already required to report critical incidents and MMCP are already required to report critical incidents and complaints. Both already have policies and processes in place
- Reporting Critical Incidents and Complaints/Grievances are performance requirements of the Children's Waiver.
 - These are new requirements for HCBS providers and C-YES, as well as additional requirement for HHSC.
- Due to the increased number of organizations that need to report and additionally reporting requirements, the IRAMS was developed to be automated

At this time MMCP will not be in the IRAMS due to a reporting structure already in place with additional reporting elements.

For the Health, Safety, & Well-being of the Member

- The requirement to report Critical Incidents as well as Complaints/Grievances is to ensure that issues surrounding the members served by Health Homes, C-YES, HCBS providers, and Medicaid Managed Care Plans reviewed, assessed, and addressed for the Health, Safety, and Well-being of the member.
- It is everyone's responsibility to report and ensure issues are addressed
- Collaboration among the service providers of Health Homes, C-YES, HCBS providers, and Medicaid Managed Care Plans should occur whenever possible. Services and Plan of Care adjusted accordingly
- Additionally, all members must be told of their rights to file a complaint/grievance, report an
 incident, and file a Fair Hearing.



IRAMS Assisting with Compliance and Oversight

- The Children's Waiver began on April 1, 2019 and the State has yet to fully comply with all reporting requirements.
- To comply with the Children's Waiver requirements, HHSC, C-YES, and Children's HCBS providers must use the system to report grievances/complaints and critical incidents effective April 1, 2021.
- Children's Waiver requirements are already included in the Children's HCBS Manual and the policy is effective April 1, 2021 for HCBS Providers.
- Additionally, the information will assist the State in oversight
 - For HHSC and HHSA, the system data will be used for re-designation
 - For HHSC, C-YES, and HCBS Providers, the system data will be used for the annual Children's Waiver case reviews



Process and Oversight Responsibilities

HHs and HH CMAs:

Care Managers/Care Management Agencies will report Critical Incidents and Complaints/Grievance (HHSC only) within IRAMS to the lead HH of the member. The Lead HH has oversight to ensure appropriate reporting and actions taken according to HH policies and standards.

C-YES:

C-YES will report Critical Incidents and Complaints/Grievance within IRAMS, which is directly report to NYS DOH.

HCBS Providers:

HCBS Providers will report Critical Incidents and Complaints/Grievance within IRAMS, which is directly report to NYS DOH.



Roles & Responsibilities

HCBS Providers/C-YES

- Submit critical incident or complaint/grievance within 24 hours of discovery date
- Take action to ensure safety and wellbeing of the member
- Notify the member's HH or C-YES to determine if the POC may need updated
- Retain all documentation related to the critical incident or grievance/ complaint

CMAs

- Submit critical incident or complaint/grievance (HHSC only) within 24 hours of discovery date
- Take action to ensure safety and wellbeing of the member
- Work with HH to resolve issue and implement appropriate actions
- Retain all documentation related to the critical incident or grievance/ complaint

Health Homes

- Review critical incident and complaint/grievance
- Provide assistance to CMA to resolve the issue and implement appropriate actions
- Sign-off that appropriate actions were taken by CMA
- Submit issue to DOH

NYS

- Reviews finalized submissions from HH
- Sign-off that appropriate actions were taken by HCBS Provider/C-YES
- Coordinate with HH/ C-YES / HCBS Provider on steps toward resolution
- Provide technical assistance when indicated
- Reports to CMS



Responsibilities and Reporting Requirements



Critical Incidents Policy

Critical Incident:

- Reporting critical incidents has been a policy requirement for both Health Homes Serving Children and Adults since 2017.
 - IRAMS will replace the current paper-based process that requires reporting for each incident and quarterly aggregate data reporting.
- Critical Incident reporting is required within the Children's Waiver for those children/youth enrolled in Home and Community Based Services.
 - In 2019, the Health Home policy was updated to include children/youth enrolled in HCBS and requiring C-YES to report.
 - Additional reporting reasons where also added to the HH policy for HHSC only
 - Effective April 1, 2021, HCBS providers will be required to report as outlined in the HCBS provider policy.

Health Home Monitoring: Reportable Incidents Policies and Procedures #HH0005 – Revised October 2019

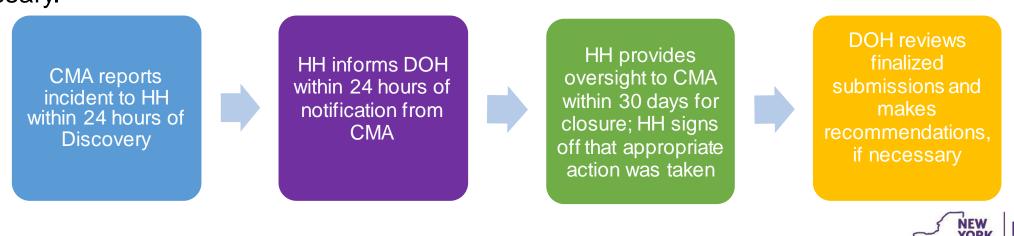
Home and Community Based Services (HCBS) Provider Reportable Incidents Policies and Procedures

#CW0004 – Effective April 1, 2021

Department

Critical Incident Reporting Timeline – HH/CMA

- The Health Home Care Management Agency (CMA) must inform the Lead Health Home of a reportable incident within 24 hours (or next business day) of notification or discovery (becoming aware of the incident).
- The Health Home (HH) must inform the Department within 24 hours (or next business day) from the CMA's report.
- The Health Home will provide oversight and direction to the CMA to conclude the reportable incident within thirty days (30 days) of receiving the incident report. In IRAMS, the HH signs off that appropriate action was taken for critical incidents.
- The Department will review the incident reported by the HH and make recommendations, if necessary.



IRAMS Timelines

HCBS
Provider/C-YES
Critical Incident

24 hours: HCBS provider/C-YES submits initial critical incident report

30 days: conclusion of critical incident and report completed; DOH signs-off on appropriate actions

DOH receives finalized critical incident report

HHSA&HHSC /CMA Critical Incident

24 hours: CMA submits initial critical incident report

24 hours: HH reviews and notifies DOH of critical incident 30 days: conclusion of critical incident and report completed; HH signs-off on appropriate actions

DOH receives finalized critical incident report

This is to illustrate that the same timeline and process occurs, however, the Lead HH has oversight of HH CMAs unlike the HCBS providers and C-YES



Complaint and Grievance Policy

Complaints and Grievances:

- In the original critical incident reporting policy for Health Homes, complaints and grievance were also included, but then removed in the updated policy
 - A number of Health Homes continue to monitor complaints and grievances of members being served.
 - Effective April 1, 2021, HCBS Providers, Health Homes Serving Children (**only**), and C-YES will need to report complaints and grievances as outlined in the Children's Waiver and issued policies.

Complaint and Grievance Policy for Health Homes Serving Children #HH0013 – Effective April 1, 2021

Complaint and Grievance Policy for Home Community Based Services (HCBS)
Providers #CW0008 – Effective April 1, 2021



Timeline for Responding to Grievances/Complaints

Member or member representative files grievance / complaint

HHCM/C-YES/HCBS
Provider updates the member within 72 hours of receiving grievance/complaint

HHCM/C-YES/HCBS
Provider provides member
with resolution; member
can escalate to Medicaid
Help Line if not satisfied

NYS receives copy of grievance / complaint and reviews

45 days

Per policy, complaints must be resolved within 45 days; IRAMS currently flags complaints at 30 days to align with critical incidents

For more information on the grievances/complaints process, see the **Health Home policy**: here Or HCBS Provider policy: here



IRAMS Timelines

HCBS Provider/ C-YES Complaint/Grievance

24 hours: HCBS Provider/C-YES submits initial complaint/grievance 72 hours from receiving complaint, HCBS Provider/C-YES updates member

45 days*: issue resolved; DOH signs-off on appropriate actions

DOH receives finalized report

HHSC/CMA Complaint/Grievance

24 hours: CMA submits initial complaint/grievance 24 hours: HH reviews and notifies DOH of complaint/grievance 72 hours from receiving complaint, CMA/HH updates member

45 days*: issue esolved; HH signs-off on appropriate actions

DOH receives finalized report

This is to illustrate that the same timeline and process occurs, however, the Lead HH has oversight of HH CMAs, unlike the HCBS providers and C-YES

*Per policy, complaints must be resolved within 45 days; IRAMS currently flags complaints at 30 days to align with critical incidents



Children's Waiver Performance Metrics

CMS requires the State to monitor, track, trend, and report regarding critical incidents and complaints/grievances – IRAMS will more accurately capture these items for the State.

Critical incident performance measures the State is required to report to CMS:

- "Percent of reports related to abuse, neglect, and exploitation and unexplained death of participants where an investigation was initiated within the established timelines."
- "Number and percent of substantiated cases of abuse, neglect and exploitation and unexplained death where recommended actions to protect health and welfare were implemented."
- "Number and percent of participant incidents that were reported, reviewed, and completed within required timeframes as specified in the approved waiver."
- "Number and percent of unauthorized uses of restrictive interventions including restraints and seclusion that were appropriately reported."

Reference: Approved Effective December 1, 2020 HCBS Waiver Application NY 4125 R05.09— December 2020 (PDF)



Accessing IRAMS



Who Should Access IRAMS?

- Each HH/CMA should identify 2-3 users who will have access to IRAMS (not all care managers need access).
- Reminder: Lead Health Homes must complete the "IRAMS Template" (emailed on 3/23) on behalf of their network CMAs by noting the 2-3 individuals who will have access to IRAMS. The Department will not grant access to CMAs without information from the Lead Health Home.
 - IRAMS Template was due Monday 3/29; completed spreadsheets can be emailed to:
 Email Health Homes webform:

https://apps.health.ny.gov/pubpal/builder/email-health-homes

Select: IRAMS Questions only- No PHI

- o If Health Homes have yet to turn the spreadsheet in, it needs to be done immediately
- Additional guidance is forthcoming regarding the process to notify DOH of any changes to user access



Who Should Use IRAMS?

- The **lead Health Homes** can determine if they will allow their CMAs to enter IRAMS or if the lead Health Home will enter the information on their own.
 - **Please note:** The IRAMS will be tracking compliance timeframes as outlined in policy, that will later be reportable to CMS.
 - HHs are encouraged to grant access to all CMAs to improve compliance and timeliness.
 - If lead Health Homes choose *not* to grant access to CMAs, they must inform the Department of their policy to ensure complete and timely reporting.



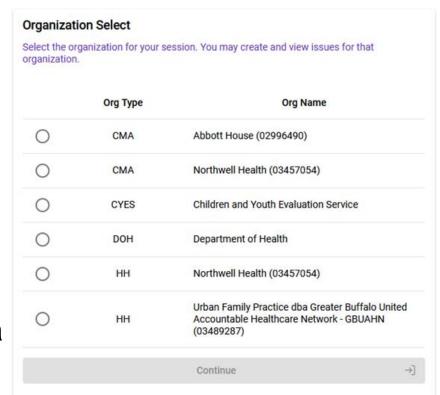
Accessing IRAMS

- Access IRAMS through the Health Commerce System (HCS).
- Access will be given by the HCS Coordinator for each agency (HH, CMA, C-YES, HCBS provider).
- Each identified user must have a valid HCS ID registered with their organization to setup an HCS ID, please follow the instructions included in the 3/23 email attachment: Paperless HCS User Account Request Steps.
- The HCS Coordinator must assign the IRAMS Issue Reporter role to their users.
- The user can then navigate to https://increp.health.ny.gov/ to access IRAMS beginning on April 1, 2021.



Accessing IRAMS

- The IRAMS application is not compatible with Microsoft Internet Explorer. IRAMS is compatible with Google Chrome, Microsoft Edge, and Mozilla Firefox.
- After logging-in to HCS and selecting the IRAMS application, the user will be prompted to select their "organization type" (only if they have more than one organization assigned the IRAMS Reporter role).
- Specific features are available or hidden in accordance with the organization type; for example, a CMA may assign an issue to a HH but would be unable to assign an issue directly to the DOH.





IRAMS Homepage Overview



IRAMS Homepage

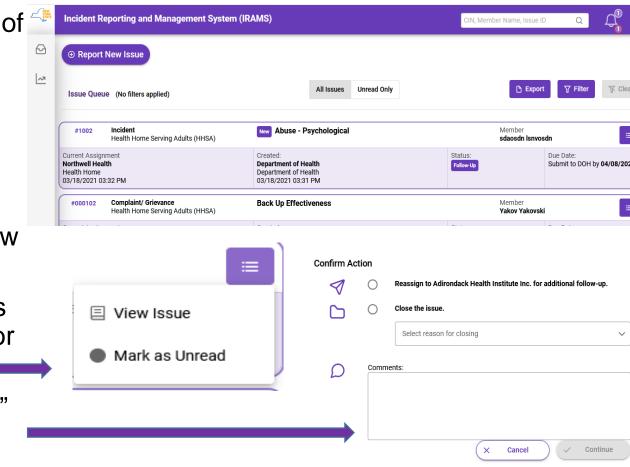
- Issue Queue
- Viewing Issue Details
- Acting on an Existing Issue
- Report Listing
- Exporting Data
- Issue Quick View
- Search Bar
- User Info/Preferences and Logout
- Returning to the Home Page
- Reporting a New Issue

Issue = the Critical
Incident or
Complaint/Grievance
being reported



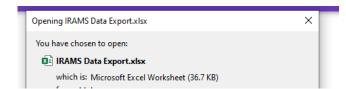
IRAMS Homepage: Issue Queue

- The Issue Queue contains summary snapshots of Incidents, Complaints and Grievances.
- Users are able to sort or filter the list based on preferences
- The items shown on the list are based on the user's organization and role
- Click on the information icon on any issue to view the issue details or mark the issue as unread.
- Clicking "View Issue" brings up the Issue Details screen to review the issue and to post a public or private comment
- From the Issue Details screen, clicking "Actions" prompts the user to reassign or close the issue.



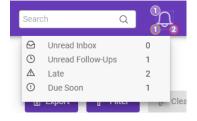
IRAMS Homepage

Click the "Export" button to export the current issue listing to Excel.



Click on the bell icon to quickly access a count of Unread, Late, and Due Soon

items.



 The search bar allows the user to search issues by Client Identification Number (CIN), Member Name or Issue ID.



IRAMS Homepage

 Clicking on the User Info icon displays current user information, allows the user to edit their profile, and allows the user to sign out of the application.



Toggle the "Email Preferences" switch to turn on/off email notifications.



Click the title bar from anywhere in the application to return to the Home Page.

Incident Reporting and Management System (IRAMS)



IRAMS Homepage: Reporting a New Issue

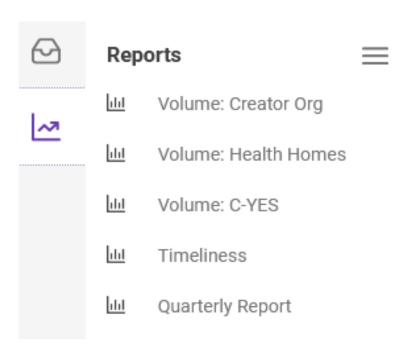
 Click the "Report New Issue" button to create a new Incident, Complaint or Grievance.





IRAMS Homepage: Report Listing

 Click the graph icon to view a listing of available reports.





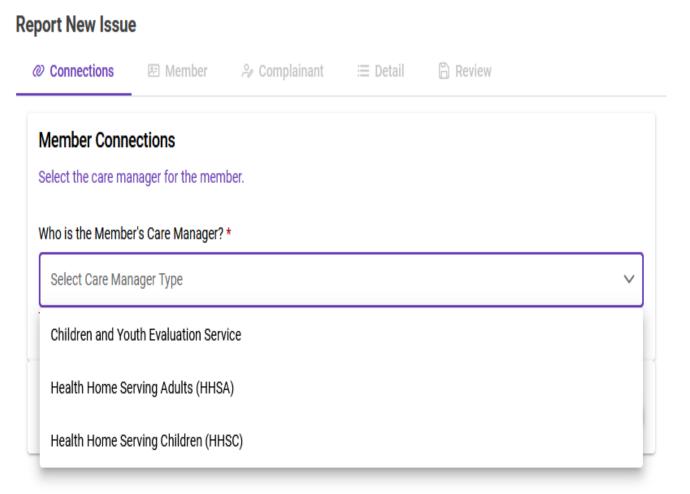
Reporting an Issue



Reporting an Issue

- Connections
- Member
- Complaint Information
- Issue Details
- Submitting an Issue

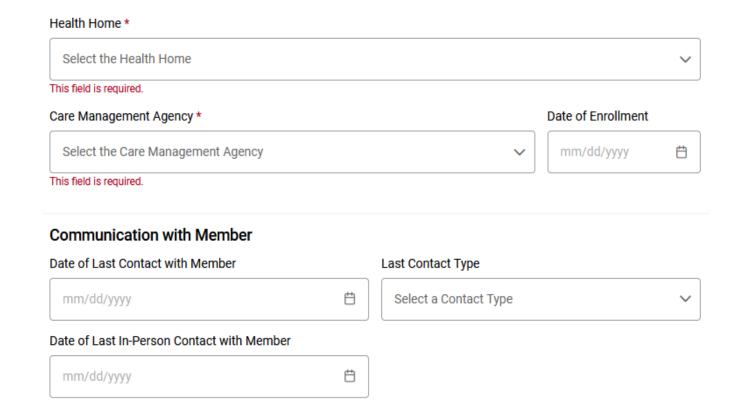
These five tabs/topic areas are the same for Critical Incidents and Complaints/Grievances





Reporting an Issue: Member Connections

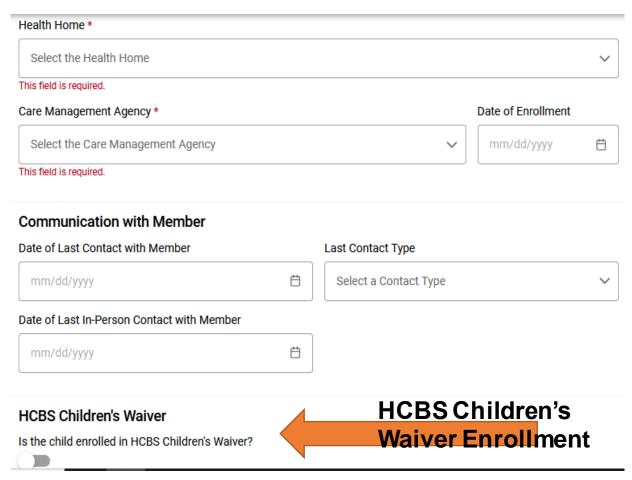
For **HHSA**, enter the Health Home, Care Management Agency, Date of Enrollment, and communication details. When complete, click "Continue" to access the Member Information screen.





Reporting an Issue: Member Connections

For HHSC, enter the Health Home, Care Management Agency, Date of Enrollment, communication details, and whether the member is enrolled in an HCBS Waiver. When complete, click "Continue" to access the Member Information screen.

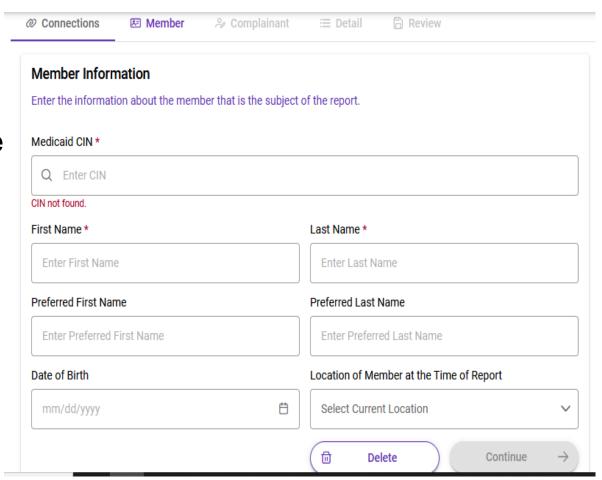




Reporting an Issue: Member Information

- The Member Information screen contains member demographic details, including CIN, first and last name, preferred name, and the member's current location. Typing in a member CIN and hitting "Enter" will prompt the system to do a search by CIN and will pre-fill fields for which data can be located.
- Once the required fields have been completed, click "Continue" to move to the Complainant page. Alternatively, click "delete" to remove the record.

PLEASE NOTE: "Delete" is used to REMOVE A RECORD FROM THE SYSTEM and should not be used to clear the fields on the screen.

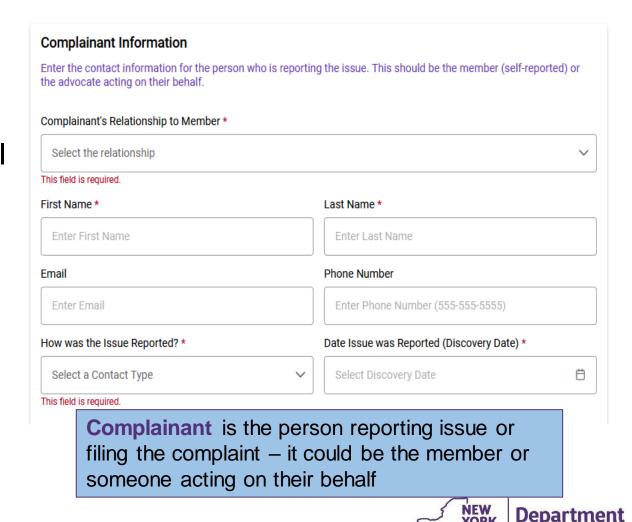




Reporting an Issue: Complainant Information

 The Complainant Information screen contains the contact information for the person reporting the issue. This should be either the member themselves (self-report) or a person acting on their behalf. Additional information captured in the Complainant Information screen includes the date the complaint was reported, and the method used, e.g., Email, In Person, Phone, Letter, Text, or Videoconference.

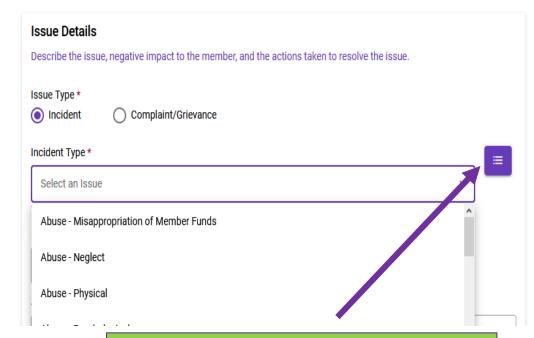
PLEASE NOTE: The issue is not recording with an identifying number until the Complainant Information screen has been completed.



Department

Reporting an Issue: Issue Details

- The Issue Details screen contains information specific to the Incident, Complaint or Grievance, including the date of occurrence, a detailed description of the issue, the impact to the member, actions taken, media coverage, and provider involvement.
- Begin by selecting the Issue Type: Incident OR Complaint/Grievance (each will prompt a different drop-down list to correspond with the types defined in the policies
- At this time, the issue ID and a "draft" notation is assigned.



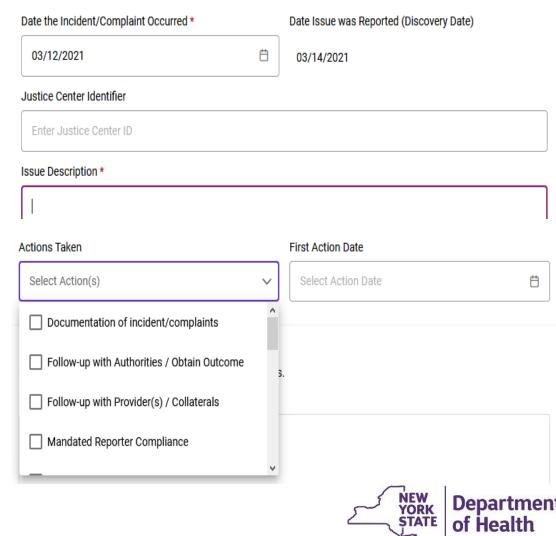
Clicking on the **Information icon** will display a dictionary of Incidents and Complaints to assist with selection. These descriptions align with the issued policies. Clicking "Select" in this listing will assign the selection to the Incident Type or Complaint/Grievance Type field.

Reporting an Issue: Issue Details

- Continue reporting the issue by noting the date of occurrence and a description, as well as the Justice Center Identifier (if known and applicable).
- The Discovery Date displays what was entered on the Complainant Information page and cannot be edited from this page.

Please Note: The date of occurrence must be on or before the Discovery and Action dates.

 Following the issue description continue by selecting the actions taken and noting the date of the first action. More than one action may be selected.



Reporting an Issue: Issue Details

Note any media coverage and provider involvement.

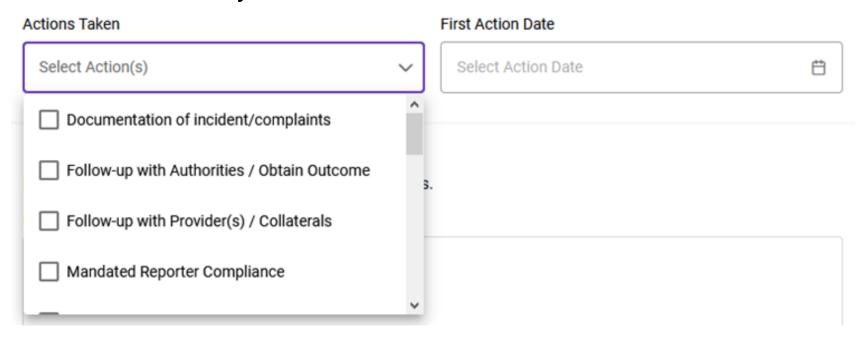
Please Note: toggling "Media Coverage" on will require the user to enter information into the Media Coverage text box. Please do not include obituaries in the Media Coverage section.

 Click "Continue" to review the issue details and submit the report, or "Delete" to completely remove the record.

Media Coverage	
Provide link(s) to media coverage. Do not inloude obituaries.	
Media C	Coverage
Duarda	las Invalvanaant
	er Involvement
Was the	Care Manager or HCBS Provider directly involved in the incident?*
	oute manager of riobot fortide directly involved in the modern:
•	No Involvement
O	
O	No Involvement
O	No Involvement

Reporting an Issue: Actions Taken

- Following the issue description, users must select the actions taken and record the date the first action was taken. The description of the actions taken should support the selection.
- More than one action may be selected





Reporting an Issue: Submitting an Issue

- The Review page displays a complete listing of all information entered. The user should carefully review this page before submitting the issue.
- Clicking on any previous page allows the user to make changes to individual fields.
 Changes will not be saved until "Continue" is clicked on the page being updated.

Review the reported issue and submit the report.

Connections

Care Management: Health Home Serving Children (HHSC)
Health Home: BESTSELF BEHAVIORAL HEALTH, INC

Care Management Agency: Abbott House Enrollment Date: 03/22/2021

Communication with Member

Last Contact Date: 03/22/2021
Last Contact Type: Email
Last In-Person Contact Date: 03/22/2021

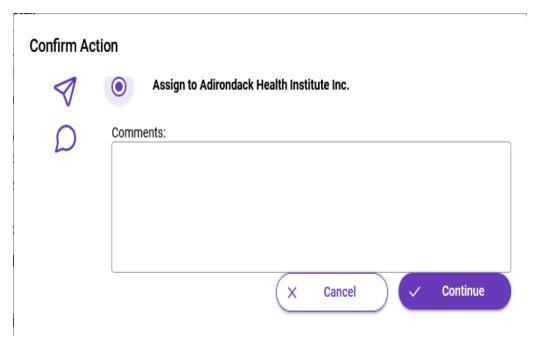
Member

CIN: AA12345B



Reporting an Issue: Submitting an Issue

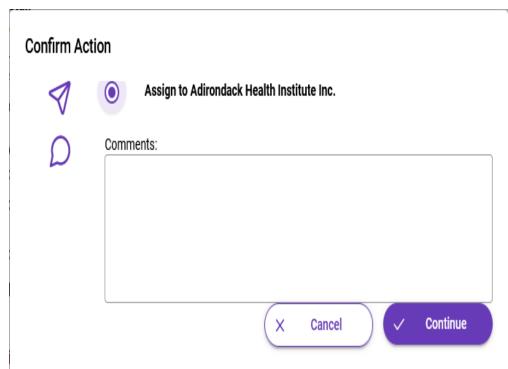
- Clicking the "Actions" button brings up a dialog box that prompts the user to confirm assignment to the appropriate agency and provide comments.
- Select "Cancel" to return to the review page, or "Continue" to submit the issue and return to the IRAMS home page.
- Once submitted, the issue will be routed to either the Health Home (for issues submitted by CMAs) or to DOH.





Reporting an Issue: Submitting an Issue

- It is the responsibility of the HH, C-YES, and HCBS Providers to ensure all appropriate actions were taken
- For critical incidents, this includes that steps were taken to ensure the safety and wellbeing of the participant
- For complaints/grievances, this includes that the issue was resolved or appropriately escalated
- Note: for issues submitted by CMAs, HH's confirm appropriate actions were taken; for issues submitted by HCBS Providers/C-YES, DOH confirms appropriate actions were taken





IRAMS Reporting



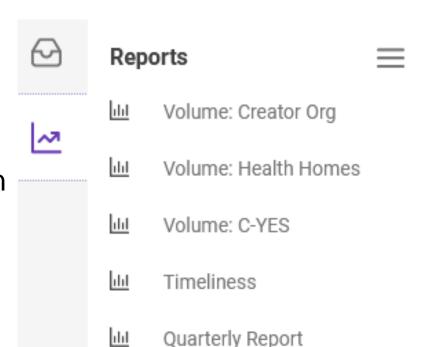
IRAMS Reporting

- Using Quick Filters
- Exporting a Report to Excel

From the IRAMS home page, select the reporting icon to view a list of available reports.

Please Note: the display reflects reports available for the selected organizational role.

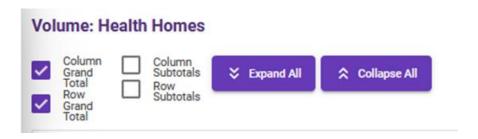
Reports were built off the current (paper-based) reporting templates and incorporate the performance measures required by the federal government as well as feedback from Health Homes



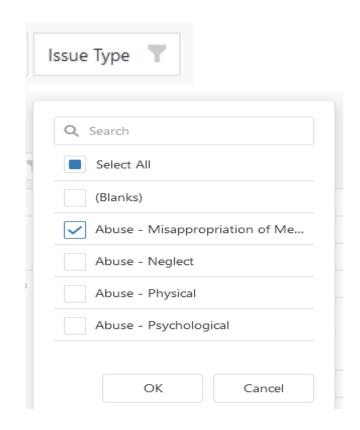


IRAMS Reporting

- Users can quickly filter on any category by clicking the filter icon to narrow the display in the report preview screen
- Selecting "Total" options will add Grand and Subtotals to the report.

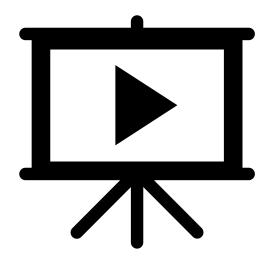


• Clicking the icon will export the report to Excel .xlsx format





IRAMS Live Demo





Questions/Feedback

- Questions and requests for technical assistance regarding IRAMS can be sent to the Email Health Homes webform: https://apps.health.ny.gov/pubpal/builder/email-health-homes Select: IRAMS Questions only- No PHI
- Users should also share feedback over the next 30-60 days so changes or updates can be made to the system as needed
- Thank you to the Health Home focus group that already provided feedback!







Appendix



Resources and Questions

- HHCMs and HH CMAs should first talk with their Lead Health Home regarding questions and issues they may have
- Question regarding IRAMS can be sent to the Email Health Homes webform: https://apps.health.ny.gov/pubpal/builder/email-health-homes
 Select: IRAMS Questions only- No PHI
- Questions, comments or feedback on Health Homes Serving Children to: hhsc@health.ny.gov or contact the Health Home Program at the Department of Health at 518.473.5569
- Specific Questions/Comments regarding Transition services <u>BH.Transition@health.ny.gov</u>
- Subscribe to the HH Listserv
 http://www.health.ny.gov/health-care/medicaid/program/medicaid-health-homes/listserv.htm

Children's Waiver Website:

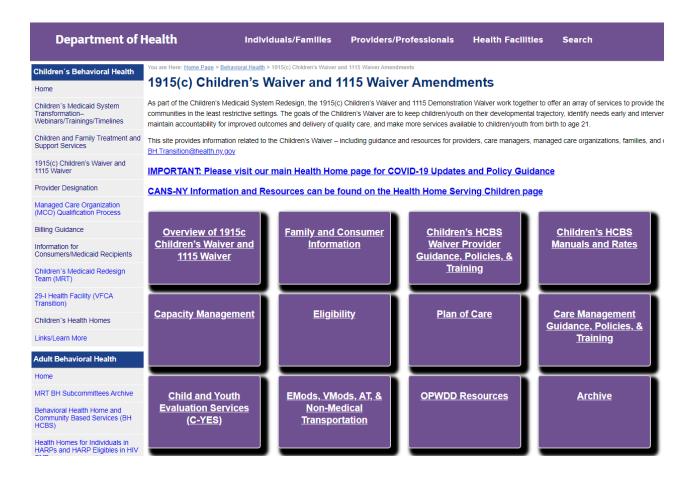
https://www.health.ny.gov/health_care/medicaid/redesign/behavioral_health/children/1115_waiver_amend.htm





NYS DOH Website

Find guidance, policies, forms, webinars, and more on the NYS DOH 1915c Children's Waiver webpage located at, https://www.health.ny.gov/health-care/medicaid/redesign/behavioral-health/children/1115-waiver-amend.htm





Resources: Policies

Children's Waiver Participants Rights Policy

https://www.health.ny.gov/health care/medicaid/redesign/behavioral health/children/docs/cw0009 participants rights an d choice policy.pdf

Health Home Grievances and Complaints Policy

https://www.health.ny.gov/health care/medicaid/program/medicaid health homes/policy/docs/hh0013 hhsc complaint a nd grievance policy.pdf

HCBS Provider Complaints and Grievances Policy

https://www.health.ny.gov/health_care/medicaid/redesign/behavioral_health/children/docs/cw0008_hcbs_provider_compl_aints_and_grievances_policy.pdf

Health Home Reportable Incidents Policy

https://www.health.ny.gov/health_care/medicaid/program/medicaid_health_homes/policy/docs/hh0005_reportable_incide_nts_rev_10_2019.pdf

HCBS Provider Reportable Incidents Policy

https://www.health.ny.gov/health_care/medicaid/redesign/behavioral_health/children/docs/cw0004_hcbs_provider_report_able_incident_policy.pdf

Department of Health Complaints

- Enrollees and providers may file a complaint regarding managed care plans to DOH
 - o 1-800-206-8125
 - o <u>managedcarecomplaint@health.ny.gov</u>
- When filing:
 - Identify plan and enrollee
 - Provide all documents from/to plan
 - Medical record not necessary
- Issues not within DOH jurisdiction may be referred
- DOH is unable to arbitrate or resolve contractual disputes in the absence of a specific governing law
- File Prompt Pay complaints with Department of Financial Services: https://www.dfs.ny.gov/insurance/provlhow.htm





Referral Form Instructions

- The Children and Youth Evaluation Service (C-YES) accepts referrals from individuals and providers including a parent, wider family member, doctor, therapist, school guidance counselor, CBOs and others:
- Individuals and families should call C-YES so that we can send you a Referral Form and a pre-paid return envelope in the mail right away! You can mail back the form in the envelope at no cost to you. Call C-YES at 1-833-333-CYES (1-833-333-2937). TTY: 1-888-329-1541
- Providers and Organizations with secure email protocols can download the Referral Form below. Return the form to: CYESREFERRAL@MAXIMUS.COM. Be sure to include the child/youth's name and contact information.
- C-YES Referral Form

