Bureau of Managed Care

Managed Care Organizations

Policy / Procedures

General Contract Monitoring

Critical Incident Compliance

Effective April 1, 2022, MCOs shall begin applying the revised HFS Critical Incident Guidelines and Templates for monthly and quarterly reporting in order to continue to comply with all health, safety and welfare monitoring and reporting required by State and Federal statute or regulation, and as required under Contract.

A critical incident is an actual or alleged event that creates the risk of serious harm to the health or welfare of a client receiving waiver services. When a critical incident occurs involving a client, a report must be made to the case manager of the case management agency that is coordinating the care for the client. Case managers must report the critical incident within the timeframes required by each waiver. A critical event occurs during the provision of services to an individual or affects the provision of services to an individual. Incident reporting is essential to safeguarding the health, safety, and welfare of all membership.

All entities or persons that report incidents shall comply with applicable confidentiality laws and Health Insurance Portability and Accountability Act (HIPAA) requirements, regarding the reporting of confidential information and protected health information. In addition, reporting incidents under the provisions of this policy shall not replace the mandatory reporting requirements of the State of Illinois with regard to Abuse, Neglect, or Exploitation.

Health plans should identify, address, and seek to prevent the occurrence of Abuse, Neglect and Exploitation. MCOs are required to educate Providers, Member, and Member's family about the signs of Abuse, Neglect, and Exploitation, and what to do if they suspect Abuse, Neglect or Exploitation. The revised HFS Critical Incident Guide provides detailed information on MCO responsibilities to identify, report on, to address, and seek to prevent the occurrence of Abuse, Neglect and Exploitation.

Critical Incident Reporting

MCOs shall prepare and submit monthly and quarterly Critical Incident Reports to HFS, as required in Section IV of the revised HFS Critical Incident Guide, and as outlined in the HFS Critical Incident Report Excel Spreadsheet Template.

MCOs will submit completed monthly and quarterly Critical Incident Reports to HFS via the MCO Administrative Deliverables SharePoint Portal. The SharePoint document naming convention information and report due dates are as follows:

<u>Monthly CI Report</u>
SharePoint Report Name - **Critical Incidents Detail Rpt – Monthly**
MCO Report Type – Quality Assurance
MCO Report Naming Convention - **[MCO initials] CI Monthly Rpt [Month] [CY]**

The Monthly CI Report shall be submitted in the HFS SharePoint Portal no later than 15 calendar days after the reporting month. For example, the completed January CI Monthly Report shall be submitted in the HFS SharePoint Portal no later than February 15.

<u>Quarterly CI Report</u>
SharePoint Report Name - **Critical Incidents Detail Rpt – Quarterly**
MCO Report Type – Quality Assurance
MCO Report Naming Convention - [MCO initials] CI Quarterly Rpt [Reporting Quarter] [CY]
- Reporting Quarter:
    - Q1 – January - March
    - Q2 – April – June
    - Q3 – July – September
    - Q4 – October – December

The Quarterly CI Report shall be submitted in the HFS SharePoint Portal no later than 15 calendar days after the reporting period.
- Q1 (Jan – March) Report shall be submitted in the HFS SharePoint Repository no later than April 15.
- Q2 (April - June) Report shall be submitted in the HFS SharePoint Repository no later than July 15.
- Q3 (July - September) Report shall be submitted in the HFS SharePoint Repository no later than October 15.
- Q4 (October - December) Report shall be submitted in the HFS SharePoint Repository no later than January 15.

Policy History

Date	Action	Policy Originator
April 2018	Contract Clarification	Joe Merwin/Lauren Tomko
December 2021 and March 2022	Revisions – Clarification	Brenda Vilayhong/Amy Roberts

Policy Revisions	Revision Approved
March 2022	Laura Ray