



Putting People First

Memorandum

To: Provider Associations
 Voluntary Provider Agency Executive Directors
 DDSO Directors
 IBR Director

From: Barbara Brundage ^{BB}
 Director, Regulatory Affairs Unit
 Chair, Statewide Committee on Incident Review

Leslie Fuld, Director
 Incident Management Unit

Bob Vasko, Director
 Information Management Solutions

Date: June 03, 2011

Re: **Required** Use of the Incident Report and Management Application (IRMA)

Suggested distribution:

Agency Administrators
 Quality compliance staff
 Incident management staff
 Information technology managers

Background:

OPWDD's Acting Executive Deputy Commissioner James F. Moran issued a memorandum on May 9, 2011 regarding *Mandatory Training-Incident Report and Management Application (IRMA)*. The memo noted that OPWDD is requiring all agencies to participate in IRMA training and begin entering all Serious Reportable Incidents, Allegations of Abuse and Deaths into IRMA upon the completion of the training.

Requirements for reporting incidents and allegations of abuse are found in OPWDD regulations in 14 NYCRR Part 624. Explanations and further information about reporting requirements can be found in the *Part 624 Handbook* and other materials which are available on the OPWDD website at: http://www.opwdd.ny.gov/wt/manuals/part624/incident_management.jsp.

Much of the information in this memorandum was discussed at the IRMA informational sessions hosted by OPWDD on May 25, 2011. Additional information has been included in response to specific requests or questions asked by participants. OPWDD appreciates the widespread participation in the sessions.

Purpose:

This memorandum gives agencies further details regarding the mandated use of IRMA for on-line reporting. In addition, this memorandum gives specific steps that agencies should take in order to be prepared to participate in training and begin using IRMA.

OPWDD appreciates the cooperation of voluntary agencies in implementing this important initiative which is critical to improving services that are provided to individuals with developmental disabilities.

Mandates:

Training:

Each agency will be contacted by OPWDD regarding the mandatory training provided by OPWDD during the upcoming months. All agencies are required to participate in OPWDD training, including agencies that currently use IRMA. Agencies must send at least one individual to training and may send no more than two individuals to training. Agencies which provide services in the catchment areas of more than one DDSO may send up to two individuals to a training session sponsored by each DDSO.

Technical information about IRMA will be available at the OPWDD training sessions.

Agencies are responsible for training additional IRMA users who did not participate in the OPWDD training as necessary to implement IRMA. As discussed at the informational sessions on May 25th, OPWDD is exploring ways for agencies to conduct training which does not involve the use of production (live) accounts. More information will be provided on this in the near future.

Timeframe for beginning on-line reporting via IRMA:

Ten (10) calendar days after the completion of the training, agencies are required to begin using IRMA. This means data must be entered into IRMA for incidents that occur or are discovered on or after the tenth day after the day that agency staff participates in training. For example, if agency staff participate in training on June 20, data must be entered for incidents occurring or discovered on or after June 30.

If agencies receive training through more than one DDSO, data entry for incidents which are reported to a particular DDSO must begin 10 days after the training was received from that DDSO. If agencies choose not to participate in training by some of the DDSOs in which services are provided, data entry is required for incidents that would be reported to those DDSOs 10 days after the last training session in which agency staff participate. The agency must contact those DDSOs to inform them of the date they will begin doing their own entry for IRMA. This will prevent duplicate entry of incidents.

Please note that at the IRMA informational session held on May 25, OPWDD had identified a shorter timeframe for this requirement. Based on the feedback from providers, OPWDD has decided to extend this timeframe.

Types of incidents:

Data must be entered into IRMA for all serious reportable incidents and all allegations of abuse. In addition, data must be entered for all deaths, whether classified as a reportable incident or serious reportable incident.

Timeframe for reporting specific incidents:

All known information must be entered for each incident within 24 hours of occurrence or discovery or the close of the next business day, whichever is later. Here are some examples

<u>Incident occurred</u>	<u>Data entry required</u>
11PM Tuesday	11PM Wednesday
11PM Friday	5PM Monday
11PM Friday, July 1, 2011	5PM Tuesday, July 5, 2011

Business days are calendar days except for Saturday, Sunday, and public holidays. New York State General Construction Law Section 22 defines public holidays as: New Year's Day, Dr. Martin Luther King, Jr. Day, Lincoln's Birthday (Feb. 12), President's Day, Memorial Day, Independence Day (July 4), Labor Day, Columbus Day, Veterans' Day, Thanksgiving Day, Christmas Day, and each general election day.

For all serious reportable incidents and allegations of abuse, current regulatory requirements specify that agencies must complete an OPWDD 147 and submit it to the DDSO within 24 hours of occurrence or discovery. OPWDD considers that data entry of all known information into IRMA within that timeframe is equivalent to submission of the OPWDD 147 and that it is not necessary for an agency which completes data entry of all known information within 24 hours to submit an OPWDD 147. Agencies which do not complete the data entry of all known information within 24 hours must submit an OPWDD 147 to the DDSO within 24 hours IN ADDITION to completing the data entry of basic information into IRMA by the close of the next business day.

Please note that the required reporting into IRMA is in addition to existing notification(s) to the DDSO by telephone or other means in accordance with procedures established by the DDSO.

Information that must be entered:

Not all fields in IRMA need to be completed when data is initially entered in IRMA. It is the expectation of OPWDD that all information that is known must be entered.

Subsequent to the initial entry of an incident, agencies are required to enter additional information into IRMA, such as the investigation report, minutes of the committee, and the disposition of an abuse allegation. Additional/updated information must be entered on a weekly basis as it becomes available.

OPWDD is also exploring whether agencies will be able to meet the regulatory requirement for providing updates to their respective DDSOs on a monthly basis through IRMA data entry.

Agencies should also be aware that IRMA is designed so that an incident cannot be closed without the completion of all required fields.

Additional data entry required for open incidents already in IRMA:

Even if agencies have not been using IRMA to enter data for serious reportable incidents and allegations of abuse, data has already been entered into IRMA for the agencies by the DDSOs for some time. Beginning on the date that the agency is required to begin using IRMA, agencies will be responsible for entering subsequent information for incidents which the DDSO has previously entered information. For example, if an incident occurred on May 1, 2011 and is still open on July 12, 2011 when the agency is required to start using IRMA, then the agency is responsible for entering all subsequent data into IRMA for that incident (e.g. committee minutes and investigative reports).

If an incident that occurred on January 1, 2011 or later has been closed in IRMA, no additional data entry is required. However, if incidents that occurred on January 1, 2011 or later were closed and are subsequently re-opened for any reason, additional data entry will be required before the incident can be closed again. This is because of changes that have recently been made which increased the number of required fields.

Changes to IRMA:

Recent changes have been made in IRMA for several reasons.

First, Form OPWDD 147 was revised to include several new fields which were not previously captured in IRMA. Corresponding changes were consequently made to IRMA to request the same information. IRMA is able to generate a paper copy of the OPWDD 147 which may be necessary for the agency to make some notifications. A redacted version of the OPWDD 147 can also be generated if needed.

Second, many of the fields in IRMA were formerly not required to close an incident. Changes were made to make these fields required. This was due to the need for additional data which must be consistently entered.

Screen shots of the IRMA fields will be available on the OPWDD website. In addition, the IRMA User Manual is also available after logging into IRMA.

What agencies need to do before the training:

Submit completed user access request forms for ALL staff expected to use IRMA.

Staff that are expected to need to use IRMA must be given access to IRMA by OPWDD. This requires completion and submission of an OPWDD form for each staff person expected to use IRMA. The fillable form, **User ID and System Access Request Form (External)**, can be found on the OPWDD website at http://www.opwdd.ny.gov/gl/images/userid_form.pdf . OPWDD recommends that agencies complete the form on the computer before printing or saving. Forms completed in that manner are much more legible than a handwritten form and fewer errors will result. For all new IRMA accounts, in section 2 under “Account Request” check “Open”. When completing the form for staff not attending OPWDD sponsored training, under “Secure Application Name” put “IRMA.”

Forms should be submitted for all staff who do not have access to IRMA and who are attending the training session that note “IRMA - VA full access” on the form in section 2 under “Secure Application Name”. These forms should be submitted to the DDSO IRC (Incident Review Coordinator). This should be completed as soon as possible.

In order to identify staff who will require IRMA access, agencies should be aware there are a variety of roles in IRMA which are available for staff. A role or roles must be specified for each IRMA user other than the staff who will be attending the training (This will be covered at the training session and the staff attending should bring a list of the names and roles of individuals who have been determined to be IRMA users to the training. Prior to the training, User ID and System Access Request Forms (external) for these individuals should be completed and submitted to the DDSO Incident Coordinator. The level of access does not need to be specified on the form sent to OPWDD.

OPWDD strongly recommends the submission of forms as soon as possible in advance of the training. Since agencies will need to enter data shortly after the completion of training, it is important to minimize delays in staff access that might result from submission at the training itself. Submission instructions are on the form. If agencies are unable to submit forms for additional staff requiring access in advance, agency staff participating in OPWDD training may submit completed user access forms at the training sessions. However, this may cause a slight delay.

Agencies may also submit new user access requests to the DDSOs at any time after the training to add additional staff.

Agencies can remove a user from IRMA at any time by contacting the DDSO Incident Coordinator and completing a User Access Request Form for the user, located at http://www.opwdd.ny.gov/gl/images/userid_form.pdf . In section 2 under “Account Request” check “Close” and enter “IRMA” in section 2 under “Secure Application Name”. A list of DDSO Incident Coordinators is on the OPWDD website at http://www.opwdd.ny.gov/wt/manuals/part624/incident_management.jsp. For removal requests, please also include the user id that was issued by OPWDD under User Information.

It is particularly important for agencies to keep in mind that a request to remove a user should be made immediately when an individual separates from service. It is possible to access IRMA from any

computer with internet access, so former employees will continue to be able to access sensitive information until the user access is removed.

Agencies which provide services in the catchment areas of more than one DDSO will need to send copies of the user access forms for the individuals attending training to each DDSO if these individuals will use IRMA across the DDSOs where the agency operates. These individuals will not be able to enter data for incidents in multiple DDSO's unless the DDSO Incident Coordinator in each DDSO has granted access.

Infrequent users.

OPWDD has established general protocols concerning inactive accounts. IRMA users who do not log into IRMA for 90 days will become inactive and their accounts will have to be reactivated for them to access IRMA.

For more information:

OPWDD has established an area on its website devoted to incident management. It is available under *Information for Providers* at www.opwdd.ny.us, but it will also be listed under *Features* on the right side of the home page. OPWDD will be adding new information to this area as it becomes available. Agencies are encouraged to periodically check this area.

As indicated, additional information about on-line reporting via IRMA and related IRMA mandates will be made available in the near future. OPWDD expects to have some additional informational materials available at the training sessions (in addition to posting on the website).

If there are further questions, contact your DDSO Incident Coordinator. As noted previously, the list can be found in the incident management area of the website.

The OPWDD Information Management Solutions Helpdesk at (518) 381-2100 is also available to provide assistance.

Thank you.