



TO: Voluntary Provider Agency Executive Directors

FROM: Alan Eskenazi, Deputy Commissioner
Division of Quality Improvement

DATE: December 15, 2011

SUBJECT: Incident Trending and Analysis

The OPWDD program certification process is designed as not only a regulatory compliance activity but also one that also allows OPWDD to identify system-wide areas and opportunities for improvement. One currently identified area is related to the requirement that agencies utilize incident-related data to analyze for potential trends. By doing such trend analyses, agencies can identify potential areas for improvement and can, if indicated, develop action plans designed to minimize the likelihood of recurrence of certain incidents. A trend analysis is defined as the collection, organization, evaluation and comparison of information in order to determine potential relationships, patterns or tendencies which might exist.

OPWDD regulations (14 NYCRR Section 624.7) require standing committees established by agencies to review reportable incidents, serious reportable incidents, and allegations of abuse. It also requires committees to monitor for trends of other events or situations which may be potentially harmful, but do not meet the definition of a reportable incident. Note that Section 624.5 requires trend analysis for injuries of unknown origin. In addition, agencies must report periodically, and at least annually, to agency management and the DDSO on identified trends as well as corrective, preventative, and/or disciplinary action related to such trends.

Data for analysis can and should be obtained from the IRMA system (pre-defined reports are available in IRMA that can be used for reviewing data on incidents by program, type, and timeframe) and internal data tracking mechanisms. Please note that IRMA reports can be accessed through the Reports Menu on the IRMA homepage.

In an effort to improve the quality and consistency of trend reports, this document outlines the elements that contribute to, and ensure, a good trend analysis. OPWDD expects that trend analysis reports are discussed with the agency's Board of Directors and submitted to the DDSO by the Executive Director or Board President.

In addition to appropriate data collection and review, agencies which produce robust and useful trend analysis reports:

- Make a commitment to collect and provide data to appropriate staff for review and to enable the analysis of such data to arrive at useful conclusions.
- Recognize that trend analysis is a multi-level process, and that input from various levels within the agency is imperative.
 - Ensure all appropriate staff throughout the agency are made aware that trend analysis occurs and why.
 - Perform trend analyses with sufficient frequency and regularity so that hypotheses suggested by previous data are demonstrated as accurate or are revised as appropriate.
 - Include “Agency reportable” (i.e. occurrences which do not rise to the level of a reportable incident) occurrences in their trend analysis.
 - Examine data to identify variables that appear to influence the frequency and severity of incidents and abuse and to identify needed system improvements (e.g., non-reporting, delays in reporting, under reporting, reporting of events that do not meet the definition of an incident/abuse and should be monitored elsewhere within the agency).
 - Utilize tools such as graphs, control charts, Pareto charts, pie charts, and excel spreadsheets to help with data analysis.

In analyzing for trends, members of the agency’s standing incident review committee should maintain objectivity and independence. It is not appropriate for the standing committee to dictate corrective action, since standing committees are charged with making recommendations, even if they raise controversial issues. Based on the recommendations, agency administrators then should ensure that appropriate corrective actions are taken and sustained. It is the responsibility of agency management to determine how an identified trend is addressed.

It is important for an agency, at all levels, to be as thorough and comprehensive as possible in the preparation of trend reports and in taking the necessary corrective actions.

For questions regarding trend reports and requests for technical assistance, please call Colleen Myers at 518-474-3625 or email us at INCIDENT.MANAGEMENT@OPWDD.NY.GOV

**For an example of a quality Incident Trend Analysis report and some graph/chart formats, please visit the OPWDD website, click on News and Publications, then Manuals, then Part 624 Handbook (Incident Management) and look for Trend Analysis examples. (Note that this information will be posted on the website by December 23, 2011.)*

cc: Provider Associations
DDSO Directors
Commissioner’s Advisory Council
OPWDD Required Regulations Mailing List