State of California—Health and Human Services Agency
Department of Health Care Services

TOBY DOUGLAS
DIRECTOR

EDMUND G. BROWN JR.
GOVERNOR

December 31, 2012

PACE Policy Letter 03-12
Supersedes Policy Letter 00-04

TO: All Program of All-Inclusive Care for the Elderly (PACE) Program Directors

SUBJECT: Unusual Incident/Injury Reporting

PURPOSE

The purpose of the policy letter is to provide PACE Organizations (PO) with updated definitions and submission guidelines for the reporting of Unusual Incidents or Injuries to the Department of Health Care Services (DHCS) Long-Term Care Division (LTCD).

BACKGROUND

All POs must be consistent in the reporting of Unusual Incidents or Injuries. This letter has been prepared to ensure that all POs are using the same definitions, format and timeframes. To date, POs have been previously required to submit Unusual Incident & Injury reports to their DHCS-LTCD contract manager as required by CCR Title 22 & State licensure requirements.

DEFINITION

Unusual Incident or Injury means one which threatens the welfare, safety or health of any participant; and which is not consistent with the Center's routine operations or participant care. Any incident that meets the level one and level two criteria established by the Centers for Medicare and Medicaid Services (CMS) Health Plan Management System (HPMS) reporting guidelines, regardless of where it occurred, must be reported.

REPORTING CRITERIA & TIMEFRAMES

This policy letter serves as directive to all POs that effective January 1, 2013 unusual incident reports no longer need to be submitted directly to the POs assigned DHCS-LTCD contract manager. Incident reporting standards will now reflect CMS level one & level two guidelines (enclosed) and DHCS-LTCD PACE contract managers will monitor PO incident reporting via HPMS.

Any incident that meets the level one and level two criteria, regardless of where it occurred, must be reported. Please note, this change will not release POs from compliance with any California licensure-specific incident reporting regulations to which they are subject. DHCS-LTCD PACE contract managers will continue to monitor any California licensure-specific incident reporting through the California Department of Public Health (CDPH).

QUARTERLY REPORTING REQUIREMENT

Quarterly reports submitted by each PO no longer need to include a summary of all Unusual Incidents or Injuries reported. The summary of Unusual Incidents or Injuries reported will be reviewed by DHCS-LTCD PACE contract managers via HPMS and HPMS quarterly conference calls.

IMPLEMENTATION

Upon receipt of this letter, please immediately update your organizational policies and procedures to report all Unusual Incidents or Injuries as described in this policy letter.

Should you require additional clarification regarding this policy letter, please contact your assigned DHCS-LTCD Contract Manager.

Sincerely,

John Shen, Chief
Long-Term Care Division

Enclosures