



GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT ON DISABILITY SERVICES

DDS TRANSMITTAL #24-04

TO: Developmental Disabilities Administration (DDA) Home and Community Based Services Waiver Providers for the Following Services: Supported Living, Supported Living with Transportation, Host Home, Residential Habilitation, Day Habilitation, Day Habilitation 1:1, Small Group Day Habilitation, Individualized Day Supports, Companion, Supported Employment, Small Group Supported Employment, Employment Readiness, Employment Readiness 1:1, In Home, Respite Hourly and Respite Daily

CC: DDA Service Planning and Coordination Division, DDA Health and Wellness Unit, DDA Incident Management and Enforcement Unit (IMEU), DDS Quality Assurance and Performance Management Administration (QAPMA)

FROM: Winslow Woodland, Deputy Director for DDA *Winslow Woodland*

DATE: November 26, 2024

RE: Revised Incident Management and Enforcement Policy and Procedure

On November 1, 2024, the Director of District of Columbia Department on Disability Services (DDS) approved a revised Incident Management and Enforcement Policy, 2024-DDS-POL02, and Incident Management and Enforcement Procedure 2024-DDS-PRO-02. The Policy and Procedure will take effect on **January 1, 2025**. This policy supersedes the Incident Management and Enforcement Policy, 2016-DDA-QMD-POL01 (March 23, 2016), and the Procedure supersedes the Incident Reporting Procedure 2013-DDS-QMD-PR006 (Rev), Incident Investigation Procedure 2015-DDS-QMD-PR001, and Incident Prevention, Management and Quality Improvement Procedure 2013-DDS-QMD-PR005.

Below are highlights of key changes, but please do review the revised Policy and Procedure carefully:

- The Incident Management and Enforcement Policy adds language around mandatory reporting of suspected cases of abuse, neglect, and exploitation.
- Incident reporting for COVID-19 will be limited to positive COVID-19 tests for supported persons (reportable incident) or hospitalization for the treatment of COVID-19 (serious reportable incident).
- Reportable incidents (RI) for Emergency Room or Urgent Care visits and Serious Reportable Incidents (SRI) for Unplanned Emergency Inpatient have been split into separate reporting categories for medical and behavioral.
- One-time use of medical sedation will no longer require a Behavioral Support Plan (BSP) but will be an RI. This change will allow DDS to track the use of medical sedation.



- Any use of physical restraint, regardless of injury or use consistent with a BSP will be a Serious Reportable Incident. Again, the purpose of this change is that it will allow DDS to track the use of physical restraint.
- The SRI categories of Abuse and Neglect have been divided into more precise categories. For Abuse, these categories include Emotional/Psychological Abuse, Physical Abuse, and Sexual Abuse. For Neglect, these categories include Environmental Neglect, Inadequate Staffing, Medical Neglect, Nutritional Neglect, Staff Incompetence, and Other.
- Notification of incidents will be made consistent with the Supported Decision-Making Agreement where applicable.
- The Incident Management and Enforcement Procedure includes a process for considering reinstating provider staff members who have been placed in no contact status as a result of the final disposition of an IMEU investigation.

As part of the implementation of the revised Incident Management and Enforcement Policy and Procedure DDS will provide training to internal staff, provider staff designated as incident management coordinators (IMC), and information sessions. The training and information sessions will be held at the IMC meetings, internal DDS training community and provider forums, and other stakeholder meetings to include the Community and Provider forums, Family Support Council, and ProjectAction! meetings. These will occur prior to January 1, 2025, and resources used will be available for review and sharing.

DDS thanks the Home and Community Based Services Advisory Committee for reviewing and providing feedback on these documents.

If you have questions about this transmittal, please contact Supervisory Investigator, Greg Coffman, at greg.coffman@dc.gov or 202.730.1783 or Jose Castrillo, Supervisory Quality Improvement Specialist, at jose.castrillo@dc.gov or 202.497.5045