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Ready Set Go: Supporting States in Preparation for the Access Rule

Delaware Critical Incident Management

June 13, 2024

A business of Marsh McLennan

Agenda

Evolution of the Project

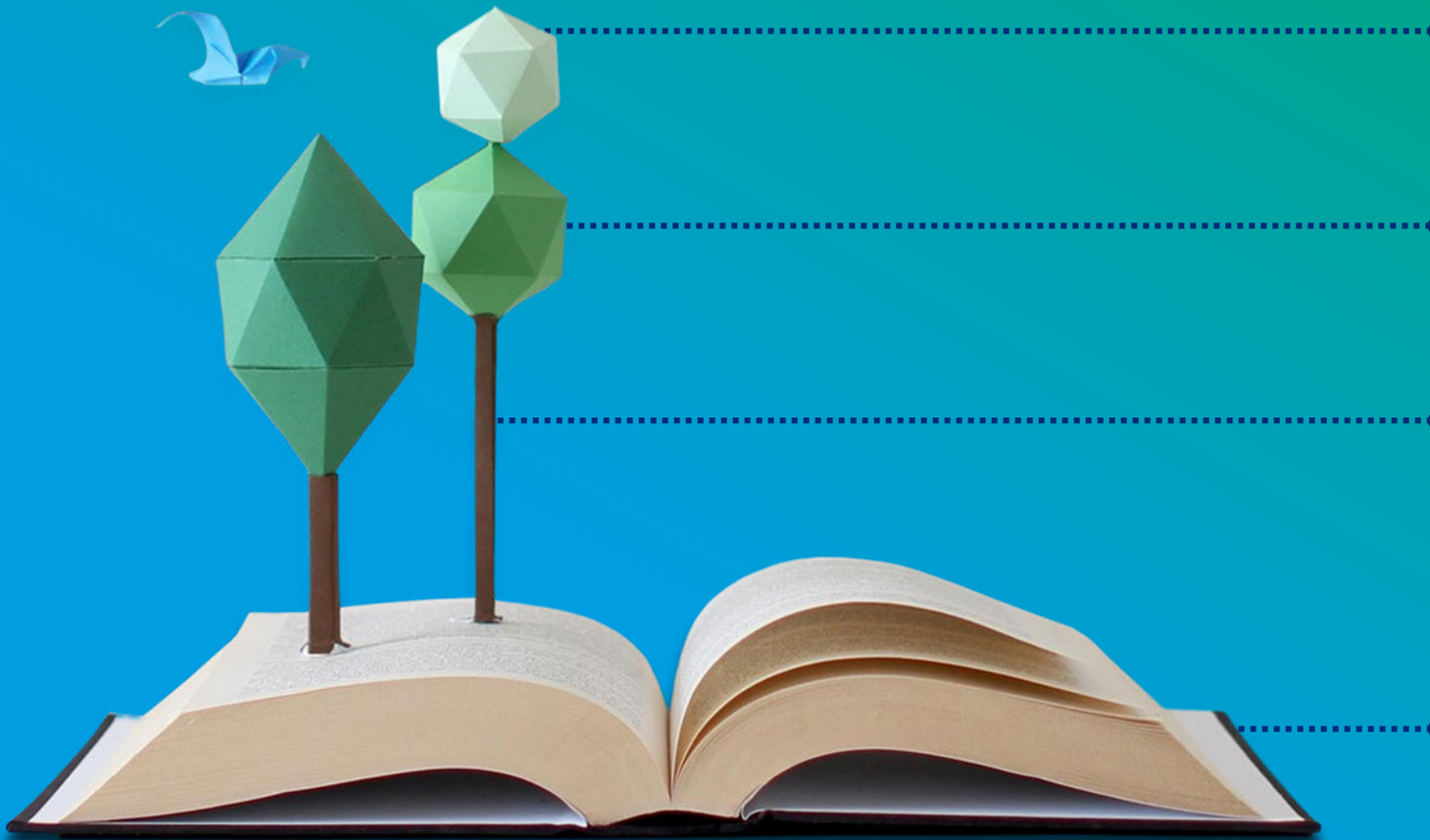**Phase 0: Incident Definition Alignment (2020)**

ARPA 9817 Funding for Phase 1: Critical Incident Management Workgroup (2022–2023)

Phase 2: WellSky System Design and Configuration (2023–2024)

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Why Now?

Updated Health and Welfare Assurance with increased focus on Critical Incident Management in 2014.

OIG and GAO Audits beginning in 2015.

OIG/ACL/GAO Joint Report in 2018.

Delaware began their earliest steps in 2020.

Funding through ARPA 9817 aligned with this priority.

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Provisions of Access Rule

In the midst of Phase 1 of this work, the Access Rule NPRM was released.

Proposed language regarding Critical Incident Management was included.

Already being involved in planning for an integrated Critical Incident Management System aligns with the proposed language.

An Electronic Incident Management System allows Delaware to be nimble and agile to address the requirements of the final rule.

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Current Work

Mercer continues to provide assistance with project management and policy and operations support.

Phase 2 is a joint project with Mercer and WellSky working in partnership.

WellSky is providing IT project management, solution-mapping, design and configuration, and training services as part of their scope of work.

Current Work

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Workgroup .... **Ensure cross-Divisional collaboration, as joint decisions about the system need to be made.**

Policy Analysis .... **Identify policy gaps or other necessary changes to policy that will need to be addressed as the system goes live.**

Goals for Data .... **Facilitate conversations on how to use the data and address systemic improvements once the system is live.**

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Best Practices for a Critical Incident Management Technology Solution

Dr. Keith Ewell, Vice President Solution Architecture

WellSky Human and Social Services Division
How we Support States

- 30-year focus on providing state human services agencies with purpose-built, cloud-based software to manage aging & disabilities services programs.

- 35+ States use WellSky for statewide case management for Medicaid and/or non-Medicaid funded human services programs and related Federal reporting compliance.

- Most widely used software for Adult Protective Services Nationally (Abuse/Neglect/Exploitation — A/N/E Data).

- Modular Platform for:
  - Waiver Management
  - Quality Monitoring/Program Oversight:
    - Provider Monitoring
    - Critical Incident Management
    - Grievance Processes

Best Practices in a Critical Incident Management Solution

- Considerations for complex ecosystem.
- Need for a single door to report incidents plus:
  - Integrations with other systems (e.g., APS).
  - Integrations with tools to identify unreported incidents.
- Flexibility/Configurability to accommodate differing levels of incident management workflow by Division/Department.
- Single database so to aggregate for all incident data.
- Ability to perform trends analysis and robust reporting.
- Predictive insights.

Incident Reporting — Complex Ecosystem

Managed Care Organizations

Law Enforcement

Adult Protective Services

Aging & Adult Services Waiver Providers

Incident Management Solution

Developmental Disabilities Waiver Providers

State Hospitals

State Facilities

Nursing Homes & ICF-IIDs
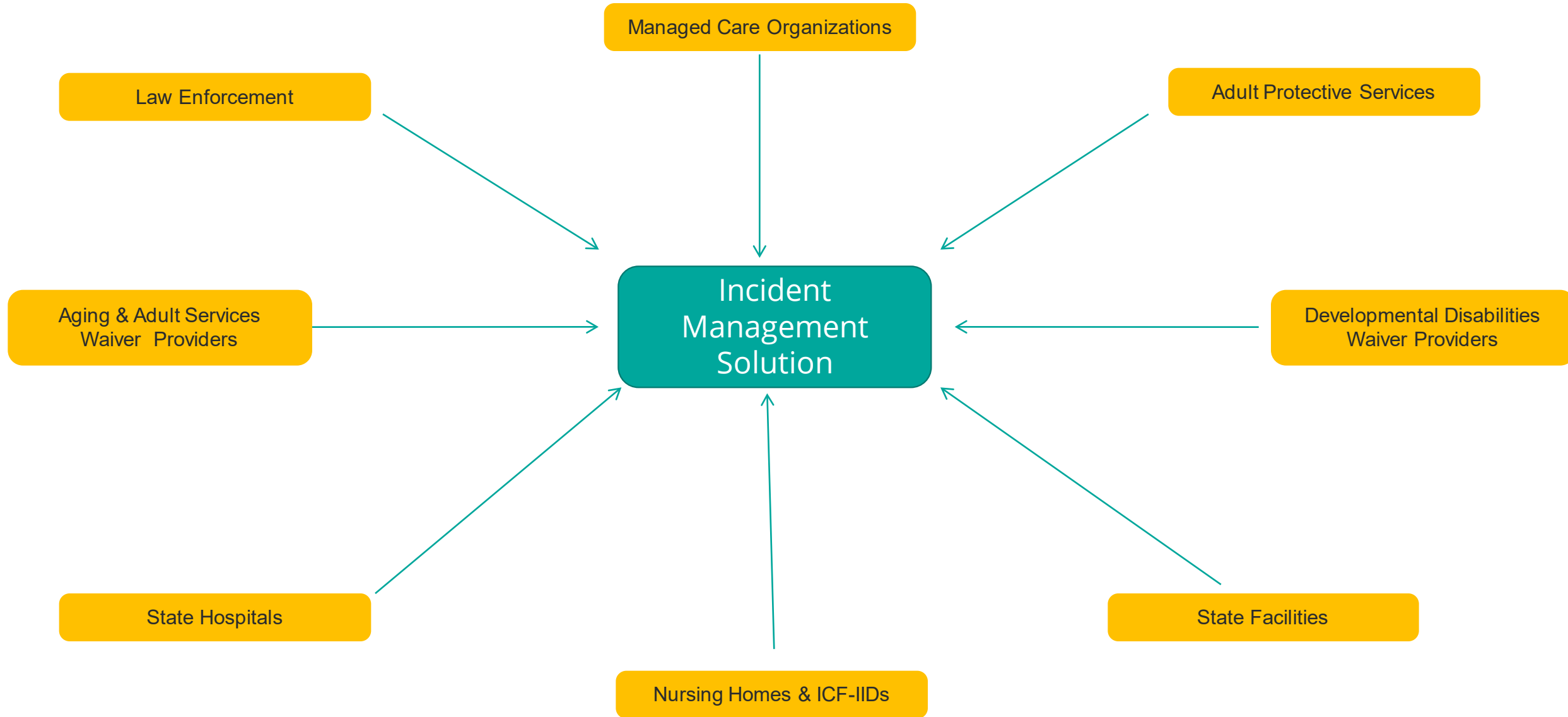
Single, Dynamic Online Incident Reporting Form Used Across Divisions

Differential Workflow by Operating Agency

Example of an Aging Waiver Incident Workflow

Differential Workflow by Operating Agency

DS ICF-ID Incident – SOR Workflow with Divisional Investigation
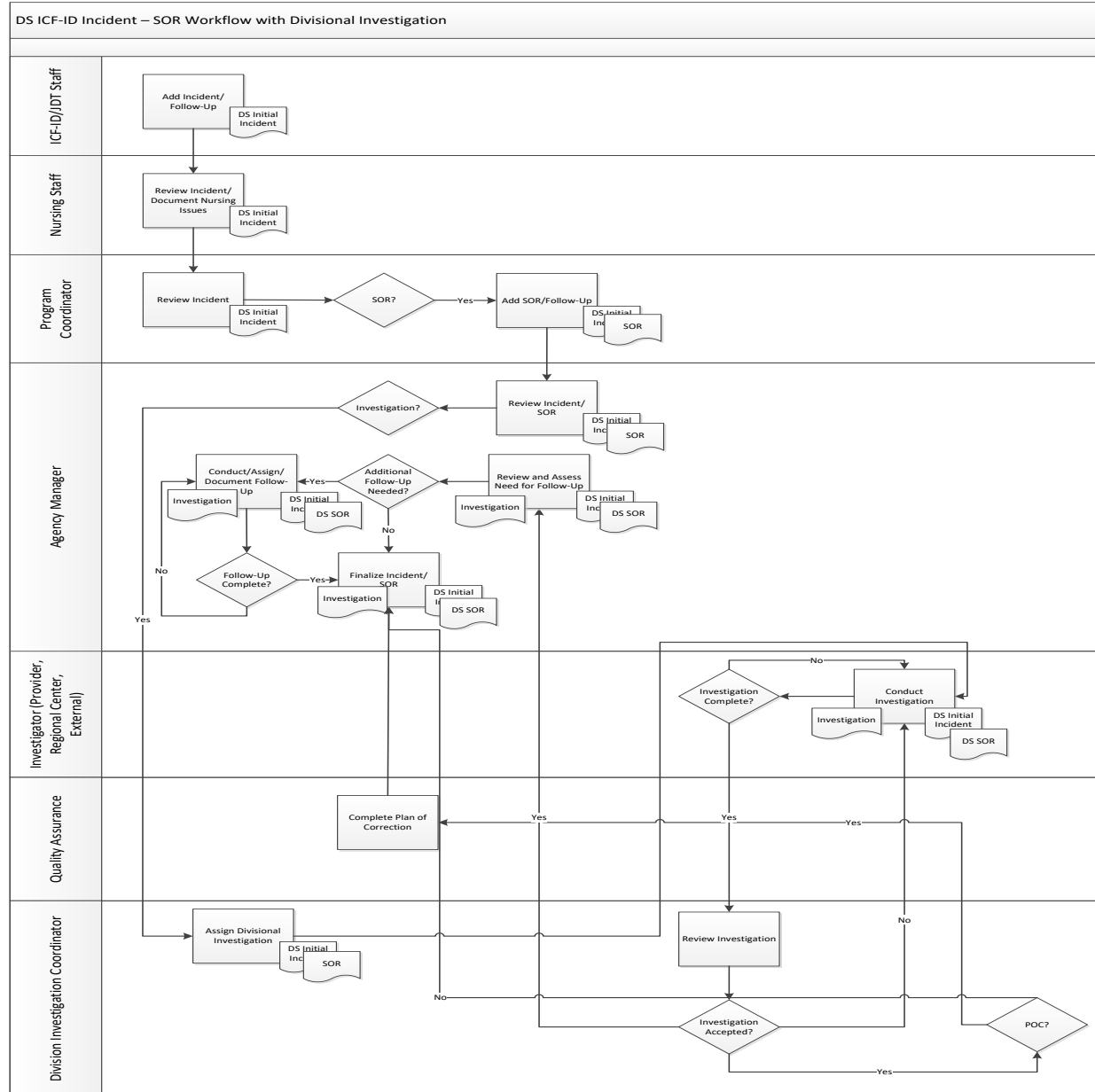
Example of a DD Waiver Incident Workflow

Population level view showing:
- **Region.**
- **Outcomes and efficiencies across diagnoses.**
- **Risks as compared to other regions.**

Population Level View by Provider Organization

Population level view showing:
- Metrics.
- Performance indicators.

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State Experience

Already Live

DDDS has used the WellSky Human Services platform for Critical Incident Management since 2017.

Collaboration

DDDS is collaborating with the other three Divisions on the integrated system.

Improve Their Experience

DDDS is using this as an opportunity to strengthen their own process workflow and data collected to support better reporting.

DDDS

Lessons Learned

Simple is better.

Do not overthink.

Definitions/allegations should be clear.

Consider impact on the data when you are not consistent.

DDDS
Lessons Learned

DELAWARE HEALTH AND SOCIAL SERVICES

What data are you missing?

What do you do with that data?

What data are you tracking now?

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DMMA Goals for the Integrated System

As the State Medicaid Agency, DMMA has the ultimate responsibility for reporting critical incidents to federal partners.

Currently, data is not streamlined, and much of the analysis to identify a problematic pattern is manual.

WellSky Human Services platform will have a positive impact on reporting capacity and transparency on incidents, including from a health equity perspective.

Once the electronic integrated system is complete and data is flowing, trends will be more readily identified.

Goals for Aggregate Reporting

Delaware is a small state, so provider agencies and DSPs, can be shared across programs.

Aggregate reporting should be able to identify incident trends at:

Provider-level: "Shady Dr. Smith" or "Problem DSP".

Member-level: Sally Sue may need an updated service plan.

Incident-level: Increase in aspiration across programs may indicate a mandatory retraining of providers is needed.
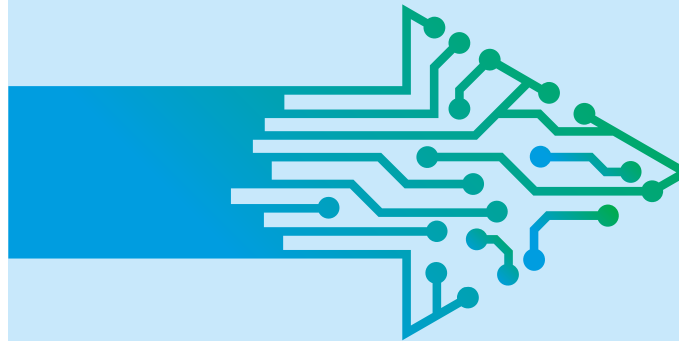
Cross-Divisional Goals

Once a trend is identified that impacts more than one Division, all Divisions collaborate to ensure that the trend is addressed.

Data will then be reviewed again to ensure the intervention has addressed the trend.

Project Lessons Learned

- Everyone has good ideas.

- Different Divisions need different things out of the system.

- Some conversations are more challenging than others.

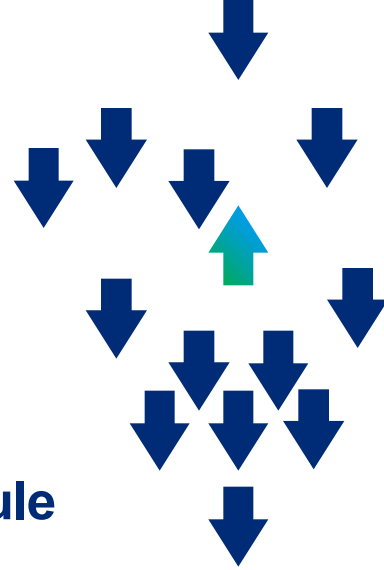- Setting expectations and predicting the challenges helps everyone remain engaged.

- Start by writing down the process.

- Respect people's time.

- Have an open mind!

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Additional Considerations

- **The recently released final Access Rule requires the following:**
  - Grievance system for fee-for-service HCBS.
  - Critical incidents identified when providers are not delivering services as expected.
  - This will be highlighted in future discussions as the system is configured.
- **Other systems to capture underreporting:**
  - May need to consider how the WellSky system will interface with other systems to ensure underreporting is identified and addressed.

Questions?

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