DEPARTMENT OF HUMAN SERVICES AND OFFICE OF THE OMBUDSMAN FOR THE INSTITUIONALIZED ELDERLY

FEDERAL INITIATIVE: MONEY FOLLOWS THE PERSON (MFP) DEMONSTRATION PROJECT

NEW JERSEY'S MFP PROGRAM: "I CHOOSE HOME NEW JERSEY"

EFFECTIVE DATE: July 1, 2014

DATE ISSUED: July 1, 2014

I.   **TITLE: Quality Management and Improvement Requirements**

II.   **PURPOSE: To establish reporting requirements for Critical Incidents.**

III.   **SCOPE: All MFP participants.**

IV.   **POLICIES:**

- According to CMS Policy Guidance dated April 23, 2013, the following three quality requirements must be in place in order to assure the health and welfare of MFP individuals upon discharge to a community setting:

- A critical incident reporting and management system and a process to ensure that the system is working as planned;
- A risk assessment and mitigation protocol and a process to ensure that the protocol is working as planned; and
- A backup strategy in place that includes access to a 24 hour back up service to address a lapse in the provision of essential health and support services or other circumstances that could have a negative effect on participant health or welfare, and a process to ensure that the strategy is working as planned.

V. PROCEDURE FOR CRITICAL INCIDENT REPORTING

- As per Article 9 of the MCO contract with the State, the MCO will use the State established reporting system for all Critical Incident reporting;
- As per Article 9 of the MCO contract with the State, the MCO will identify, track, review and analyze critical incidents to identify and address potential and actual quality of care and/or health and safety issues;
- Critical Incident Reports must be created for all MFP participants pertaining to the following:
  - Abuse;
  - Neglect;
  - Exploitation;
  - Hospitalizations;
  - Emergency Room visits:
    - Report whether the ER visit occurred within 30 days of discharge from the institution;
  - Involvement with the criminal justice system;
  - Medication administration errors;
  - Deaths;
    - Report if the death was determined to be due to abuse, neglect, or exploitation;
    - Report if the death occurred because of or a breakdown in the 24-hour back-up system or was a contributing factor;
- For each reported critical incident, the MCO must note what changes were made, either for the MFP participant or its systems as a result of the analysis of each reported critical incident.
- For any incident category not captured by the State's established reporting system, the MCO should report the incident in the "Other" category and explain the incident and answer the above question.
- The MFP Associate Project Director will run a report two times per year to obtain the required data to be included in the MFP Semi-Annual Report;
- The MFP Associate Project Director will submit the data to the MFP Project Director according to the following time table:
  - For data reported from January-June, report must be received no later than July 31st;
  - For data reported from July-December, report must be received no

later than January 31st.