

Coronavirus Disease 2019 (COVID-19): Modification of Key Tasks and Activities in Response to Incidents

ODP Announcement 20-037

AUDIENCE:

Providers
Supports Coordination Organizations
Administrative Entities
Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICF/ID)

PURPOSE:

The purpose of this communication is to outline acceptable modifications of the key tasks and activities required during the management of incidents. This communication highlights these strategies and gives additional detail to allow for a thorough incident response and investigation while maintaining social distancing protocols. In addition, the Enterprise Incident Management (EIM) system will be modified to allow users to document incidents related to the COVID-19 virus via an indicator question added to all incident reports.

Modifications of the incident management process due to COVID-19 will remain in effect until further notice.

Please note: Supports Coordination Organizations are **required** to report incidents related to the COVID-19 virus, unless the incident was reported and documented by another source.

DISCUSSION:

During the management of the COVID-19 virus, incidents will continue to be reported and investigated per the [ODP Incident Management Bulletin 6000-04-01](#). At all points during the incident management process, face to face contact should be limited and social distancing protocols should be followed. Social distancing does not eliminate the requirement to assess and mitigate risks to health, safety and rights and to implement preventative corrective actions as appropriate.

Serious concerns for an individual's safety and well-being must be immediately communicated to protective service entities, law enforcement, and other appropriate authorities. Information obtained from wellness visits conducted by these other authorities (in lieu of face to face contacts by ODP entities) can be used to ensure that actions taken to protect safety and well-being have been implemented and are effective. If wellness visits conducted by other entities are used in lieu of an ODP face to face contact, follow-up with the entity conducting the wellness check is required by the Provider or SCO to assure that ODPs level of health and safety assurances are met.

ODP recognizes that in order to be implemented and effective, some traditional risk mitigation strategies and corrective actions may need to be altered to follow COVID-19 guidelines. Individuals and their teams will continuously review risk mitigation strategies and corrective actions to evaluate if they are effective and make changes as necessary.

Beginning 4/3/2020 providers and supports coordination organizations will be able to document suspected/confirmed COVID-19 diagnoses in EIM incident reports. Entering an incident and documenting suspected/confirmed diagnosis is mandatory. This includes any time an individual has a test for suspected COVID-19 virus and/or a COVID-19 virus diagnosis. In the event that an individual receives testing at a location other than an emergency room (i.e. drive-thru test, primary care physician's office, etc.), the incident must be reported using the primary category of emergency room visit-illness new.

The requirement to report incidents of COVID-19 diagnosis extends to all individuals, regardless of service provision at the time of the incident.

Providers and supports coordination organizations serve as the Department’s front-line professionals and have the capacity and skillset to recognize and report COVID-19 related incidents in near real-time. This reporting is critical so that the Department may use the data for public health related trending and analysis in an effort to ensure that risk mitigation and response strategies are in place to protect Pennsylvanian’s most vulnerable citizens.

These two new fields will also appear in the Custom Report under ‘Incident Detail – Initial’ and ‘Incident Detail – Final’ subject areas. The following optional questions have been added in EIM:

EIM Page	Question (Yes/No Responses)
Incident Classification	Incident involves suspected/confirmed COVID-19 diagnosis
Verification of Incident Classification	Incident involves confirmed COVID-19 diagnosis (resulting from a positive test or documentation from a health care practitioner)

Due to the risk of virus transmission and based on recommendations from the Pennsylvania Department of Health (DOH), ODP Certified Investigators (CI) and Administrative Review Committees will immediately begin to modify the investigation process as follows:

CI Key Tasks and Activities	
Task/Activity	Modification Strategies
Check on the safety and well-being of the alleged victim	<ul style="list-style-type: none"> • Utilize telecommunication applications that specialize in providing video chat such as Skype, Zoom, Google Duo, Facetime, etc. ○ When telecommunication applications are not available, telephone (or a communication device of the alleged victims choosing) may be used. • Communicate via telephone with allied professionals (protective service entities, law enforcement, medical professionals, etc.) that have knowledge of the alleged victim’s safety and well-being. • Communicate all concerns for safety and well-being with appropriate organizational management. • Document in the Certified Investigators Report (CIR) details of all checks on safety and well-being. ○ The person(s) contacted. ○ The method(s) used to contact.
Interview witnesses and obtain written statements	<ul style="list-style-type: none"> • Utilize telecommunication applications to interview witnesses that specialize in providing video chat such as Skype, Zoom, Google Duo, Facetime etc. ○ When telecommunication applications are not available, telephone (or a communication device of a witnesses choosing) may be used. • Guide witnesses through the process to write their own witness statement and provide a confidential method for the witness to send a signed witness statement to the CI. ○ Follow current guidelines for when a witness is unable to or is unwilling to write their own witness statements (i.e. deposition style format). • Document in the CIR the interview and written statement method(s) used for each interview/statement obtained.
Collect Evidence	<ul style="list-style-type: none"> • Request identified evidence (Documentary,

	<p>Demonstrative, and Physical) be confidentially sent to the CI by a person designated by the CI.</p> <ul style="list-style-type: none"> ○ Physical evidence must be preserved using photography, diagrams, or other methods by those who are currently on site. ● Document in the CIR evidence collection methods.
Documentation of CI Process	<ul style="list-style-type: none"> ● Utilize the following tools to aid in creating thorough documentation of the process used by the CI during the investigation. ○ Investigation Checklists, Forms, and Logs can be obtained on MyODP at the following hyperlinks: <ul style="list-style-type: none"> ▪ Witness Statement Form (with lines). ▪ Witness Statement Form (without lines.) ▪ Evidence Logs. ▪ Preparing the Investigation Checklist. ▪ Preserving Evidence Checklist . ▪ Physical Evidence Checklist.

Administrative Review Committee Key Tasks and Activities	
Task/Activity	Modification Strategies
Meet at a frequency that allows for all cases to be completed within the necessary timeframes	<ul style="list-style-type: none"> • Conduct meetings in a format that allows the team to maintain social distancing protocols. ○ Methods such as conference calls and/or video conferences have always been permitted and must be utilized at this time.
Development of Risk Mitigation Strategies and Corrective Actions	<ul style="list-style-type: none"> • Consider if risk mitigation strategies and corrective actions need to be altered to follow COVID-19 guidelines. • Create a long-term plan for risk mitigation strategies and corrective actions that will implemented after resolution of the COVID-19 virus.

Additional Resources	
Adult and Older Adult Protective Services	Call: 1-800-490-8505
Child Protective Services	Call CHILDLINE: 1-800-932-0313
Department of Human Services	Coronavirus-Related Resources for PA Citizens
Department of Human Services	Coronavirus-Related Provider Resources
Pennsylvania Coalition Against Domestic Violence	Domestic Violence Resources
Pennsylvania Coalition Against Rape	Sexual Violence Resources

Questions about the Certified Investigator and Administrative Review Processes

Contact:

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All Other Questions Contact your Regional Program Office or Incident Management Policy Mailbox: ra-impolicy@pa.gov.