



Date: April 6, 2022

To: Community Living Assistance and Support Services (CLASS)
Direct Services Agencies
Local Intellectual and Developmental Disability Authorities (LIDDA)
Community Living Assistance and Support Services (CLASS)
Case Management Agencies
Deaf Blind Multiple Disabilities (DBMD) Providers
Home and Community-based Services (HCS) Providers
Texas Home Living (TxHmL) Providers

Subject: Information Letter No. 2022-23
New Critical Incident Management Reporting System for 1915(c)
Medicaid Waiver Program Providers **(REVISED)**

This letter replaces Information Letter 2022-14 and is a status update on the Critical Incident Management System (CIMS) implementation which impacts fee-for-service 1915(c) waiver program providers, CLASS Case Management Agencies (CMAs) and Local Intellectual and Development Disability Authorities (LIDDAs), hereafter referred to as "waiver providers" regarding the development and implementation of the statewide CIMS for reporting critical incidents.

Background and CIMS PURPOSE

The Health and Human Services Commission (HHSC) is implementing a new statewide CIMS for reporting critical incidents. The new system will be in compliance with guidance issued by the Centers for Medicare and Medicaid Services (CMS) on March 12, 2014. In an Informational Bulletin titled "[Modifications to Quality Measurements and Reporting in §1915\(c\) Home and Community-Based Waivers](#)", CMS notified states about modified assurances related to health and welfare and the need to create a more robust system for tracking critical incidents "to benefit the individual receiving services by using data to prevent future incidents." The guidance established the following assurance: "The state demonstrates it has designed and implemented an effective system for assuring waiver participant health and welfare." While HHSC collects critical incident information in various systems, most of the information is collected in the aggregate or resides in a data system that is maintained and operated by a state agency that is no longer part of the HHSC enterprise (e.g. IMPACT system operated

by the Department of Family and Protective Services). To streamline the level of critical incident information received and to standardize the format, the Legislature appropriated funding during the 86th Legislature, House Bill 1, for the new CIMS.

TIMELINE FOR IMPLEMENTATION

HHSC is working with FEI Systems, the CIMS vendor, to configure a platform to collect all required critical incident information across all 1915(c) waiver programs. This will include information on abuse, neglect, and exploitation allegations in addition to other critical incidents required by program policy. All waiver providers will be required to report information into the new system.

The system is targeted to go live July 25, 2022. Prior to the go live date, HHSC and FEI Systems will provide training on the new system for waiver provider staff who will use the CIMS to report critical incidents. There will be training provided by FEI Systems using webinar formats; however, there will be limited capacity and these trainings will be focused on staff using the CIMS to report incidents. Virtual training resources will be available and accessible to waiver provider staff in addition to information provided during training webinars. The goal is to support waiver provider staff with virtual training available for reference at any time to support using the system.

HHSC understands staff shortages and other challenges associated with the pandemic make this a difficult time to implement a new reporting system. HHSC will work with all waiver providers to ensure this transition in reporting systems occurs on a reasonable timeline even though the system itself will be available to providers beginning July 2022.

ORGANIZATION INFORMATION

Given the short timeline for implementation of the CIMS system, HHSC is preparing waiver providers organization and contract information, which will be uploaded into the CIMS by FEI Systems prior to go-live. The owner or staff identified in the contract with HHSC will be given administrative rights in the CIMS to update, change, and give additional staff access to their waiver providers' information. As noted in the alert entitled [Critical Incident Management System Contact Information for HCS Program Providers, TxHmL Program Providers and LIDDAs](#)

posted on March 31st, 2022 the waiver providers need to verify contact information is correct and let HHSC staff know as instructed in the alert if contact information needs to be updated.

SYSTEM TESTING

Testing for the new system will begin in early May 2022 and HHSC has identified a small group of waiver providers representing all 1915(c) waiver programs to assist with the testing and consult on how the system functions from a user perspective.

Questions about this project can be submitted to LTSS_Policy@hhs.texas.gov. More information will be provided through gov delivery announcements and policy webinars so please ensure your agency is signed up to receive gov delivery for their respective programs.

Sincerely,

[signature on file]

Michelle Erwin
Deputy Associate Commissioner of Policy and Program
Medicaid and CHIP Services