License #: **3055-14-008**
Organization Name: **Gatewood Children's Homes, Inc.**

Date of Inspection: **12-30-2024**
Program Type/Facility Name: **14-008 Jordan House (current)**

Standard(s) Cited	Comp	Description of Noncompliance	Actions to be Taken	Planned Comp. Date
12VAC35-46-1070. C. - The provider shall notify the department within 24 hours of any serious illness or injury, any death of a resident, and all other situations as required by the department. Such reports shall include: 1. The date and time the incident occurred; 2. A brief description of the incident; 3. The action taken as a result of the incident; 4. The name of the person who completed the report; 5. The name of the person who made the report to the placing agency and to either the parent or legal guardian; 6. The name of the person to whom the report was made.	N	Jordan House (current) This regulation was NOT MET as evidenced by: CHRIS Number: 20240018 Date/Time of Discover: 12/06/2024 10:30PM Enter Date/Time: 12/09/2024 10:58AM Reporting Delay: 36:28:00 Location Name: Jordan House (current) CHRIS Number: 20240019 Date/Time of Discover: 12/06/2024 10:30PM Enter Date/Time: 12/09/2024 11:18AM Reporting Delay: 36:48:00 Location Name: Jordan House (current)	PR) 01/13/2025 Good morning, I'd like to dispute the above-mentioned citation. I notified my licensing specialist, Ms. Delvonne Major within 24 hours of the incident. I tried multiple times to input the incident into CHRIS before coming locked out of the system. Once locked out, I called my specialist and was instructed to send her an email of the incident. At which time, I sent her a summary email of the incident along with the critical incident reports. I also shared with her a screenshot to show I requested to have my account unlock; however, the incident occurred over the weekend and the account was not opened until Monday morning. At which time, I inputted the incident into CHRIS and alerted my specialist. Please see the attached documentation for verification. Thanks, OLR) Partially Accepted 01/28/2025 While being locked out of CHRIS is not a valid excuse for a late report, there are a few ways to minimize this issue keeping your team from entering a report in CHRIS. Please see the excerpts from our Serious Incident Reporting Guidance below. I have attached the documents for convenience as well. Memo- Guidance on Incident Reporting Requirements (August 2020) There may be unusual circumstances when a provider is unable to report an incident through	1/13/2025

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			the CHRIS system because of a CHRIS system error or a network outage. The ONLY valid reasons for not reporting a serious incident into CHRIS include: 1) The CHRIS system was not functioning at the time the incident was discovered; or 2) The provider was unable to access the CHRIS system for reasons that were not in the provider's control. If a provider is unable to report a serious incident through the CHRIS system for one of these valid reasons, then the provider must notify the Office of Licensing's Incident Management Unit (IMU) via e-mail (incident_management@dbhds.virginia.gov) of the provider's inability to report the incident through the CHRIS system within 24 hours of the discovery of the incident. Memo-CHRIS Updates (October 2019) Beginning on October 7, 2019, the IMU will begin issuing Corrective Action Plans (CAPs) statewide for all five regions for all incidents not reported within the required 24-hour timeframe. We are anticipating the impact of this change within the OL will be minimal as many providers work diligently to comply with the regulations. In preparation for this upcoming date, I would like to remind you of the following requirements: • All incident reports must be submitted within 24 hours from when the incident was discovered. • All providers are required to have a back-up person to enter incidents into CHRIS. When one individual is locked out of CHRIS the back-up individual will be able to submit the incident within the 24 hour time frame. • All providers must notify the OL IMU at incident_management@dbhds.virginia.gov, instead of their licensing specialist, when they	

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			are unable to enter an incident into CHRIS because the system is down. Additionally, • Provider is reminded that user passwords will expire if inactive for over 90 days. To keep passwords active, all users must log in at least once every 89 days. • Provider is reminded that if they are locked out to send an email to deltaprod@dbhds.virginia.gov for account resets. You may include IMU and your licensing specialist. • Provider is encouraged to review incidents after submitting to ensure information is correct. If any information is not correct and providers select that they will update the report within the initial CHRIS Report, they will have an additional 2 business days from entry date to update with any findings or other details not available on entry date. In addition to the above, the provider response needs to include the following: 1. Description of safeguards enacted agency wide to ensure all Level II and Level III are entered into CHRIS within the required timeframe. 2. Staff by title responsible for monitoring process implemented to ensure timely data entry of Level II and Level III incidents into CHRIS. This role should be	

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			someone other than the person who is responsible for entering the data in CHRIS where possible. 3. Indicate the frequency for monitoring the plan including how it will be monitored (Ex: daily checks, monthly audits, weekly chart reviews, quarterly checklist). 4. Staff by title who has the primary responsibility to enter incidents into CHRIS. 5. Staff by title who serves as back up to enter incidents into CHRIS when the designated person is unable to do so including nights, weekends, and holidays. 6. Date backups were/will be trained/reeducated on entering information into CHRIS including deadlines. 7. Staff by title who serve in the Delta roles- Administrator, Security Officer and Supervisor. 8. Date(s) Security Officer, who has the ability to reset passwords for the organization, completed training on how to reset passwords. Training video link is included in the OL Guidance & Training Links document uploaded for your convenience. 9. Provider is encouraged to review Office of Licensing CHRIS Training and Guidance documents located on the DBHDS website as a basis for staff training. You will find a document that contains links to the training and guidance documents uploaded within the CAP for your convenience. PR) 01/29/2025	

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			1. Description of safeguards enacted agency wide to ensure all Level II and Level III are entered into CHRIS within the required timeframe. Program Director was assigned as the security officer for the company. Both resident managers were assigned as secondary personnel to enter information into CHRIS. Resident Manager will inform the program director once reports are entered into CHRS. 2. Staff by title responsible for monitoring process implemented to ensure timely data entry of Level II and Level III incidents into CHRIS. This role should be someone other than the person who is responsible for entering the data in CHRIS where possible. Program Director will ensure reports are entered into Chris by the Resident Managers within the 24hour required timeline. 3. Indicate the frequency for monitoring the plan including how it will be monitored (Ex: daily checks, monthly audits, weekly chart reviews, quarterly checklist). Plan will be monitor after each incident. Manager are to inform Director of each incident incurring in the home. 4. Staff by title who has the primary responsibility to enter incidents into CHRIS. Resident Manager has the primary responsibility for entering CHRIS in the system. 5. Staff by title who serves as back up to enter incidents into CHRIS when the designated person is unable to do so including nights, weekends, and holidays. Program Director/Security Officer 6. Date backups were/will be trained/reeducated	

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			on entering information into CHRIS including deadlines. 01/20/2025. 7. Staff by title who serve in the Delta roles- Administrator, Security Officer and Supervisor. Administrator-Director/CAO Security Officer-Director Supervisor- Both Resident Managers 8. Date(s) Security Officer, who has the ability to reset passwords for the organization, completed training on how to reset passwords. Training video link is included in the OL Guidance & Training Links document uploaded for your convenience. 12/9/2024 9. Provider is encouraged to review Office of Licensing CHRIS Training and Guidance documents located on the DBHDS website as a basis for staff training. You will find a document that contains links to the training and guidance documents uploaded within the CAP for your convenience. OLR) Accepted 02/06/2025	

DEPARTMENT OF BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES
CORRECTIVE ACTION PLAN

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General Comments / Recommendations:

I understand it is my right to request a conference with the reviewer and the reviewer's supervisor should I desire further discussion of these findings. By my signature on the Corrective Action Plan, I pledge that the actions to be taken will be completed as identified by the date indicated.

Lakesha Steele, Incident Management Unit	(Signature of Organization Representative)	Date

C = Substantial Compliance, N = Non Compliance, NS = Non Compliance Systemic, ND = Non Determined