DEPARTMENT OF BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES
CORRECTIVE ACTION PLAN

License #: **758-14-009**
Organization Name: **NDUTIME Youth and Family Services, Inc.**

Date of Inspection: **08-09-2023**
Program Type/Facility Name: **14-009 Joshua House I-5803**

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	Joshua House I-5803 This regulation was NOT MET as evidenced by: CHRIS Number: 20230004 Date/Time of Discover: 07/17/2023 12:05AM Enter Date/Time: 07/18/2023 2:19PM Reporting Delay: 14:14:00 Location Name: Joshua House I-5803	PR) 08/21/2023 Provider is requesting this CAP be removed due to Provider being locked out of system and emailing Licensing for assistance and password being reset. OLR) Not Accepted 09/01/2023 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 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.	10/11/2023

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			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 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 encounter issues entering incidents in CHRIS an email should be sent to incident_management@dbhds.virginia.gov) within 24 hours of discovery of the incident. The email should include a description of the issue and with a screen shot showing the issue.	

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			• 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. In addition to the above, the provider response needs to include the following: 1. Describe the specific issue that led to the late reporting. 2. How was the late reporting of incidents addressed? Was it a meeting, a training, or process change? Please be specific. 3. Description of safeguards enacted agency wide to ensure all Level II and Level III are entered into CHRIS within the required timeframe. 4. 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. 5. Indicate the frequency for monitoring the plan including how it will be monitored (Ex: daily checks, monthly audits, weekly chart reviews, quarterly checklist). 6. Staff by title who has the primary responsibility to enter incidents into CHRIS. 7. 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. 8. Date backups were/will be	

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			trained/reeducated on entering information into CHRIS including deadlines. 9. Staff by title who serve in the Delta roles- Administrator, Security Officer and Supervisor. 10. 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. 11. 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) 09/11/2023 Although Provider does not agree with CAP issued, due to being locked out of system and notifying Human Rights for assistance, Provider will ensure current policies and procedures continue to be followed and will email incident_management@dbhds.virginia.gov if locked out of the system in the future. Primary person responsible for inputting CHRIS reports was on vacation and backup is properly trained. OLR) Partially Accepted 09/11/2023 In addition to the above, the provider response needs to include the following:	

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			1. 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. 2. Indicate the frequency for monitoring the plan including how it will be monitored (Ex: daily checks, monthly audits, weekly chart reviews, quarterly checklist). 3. Staff by title who has the primary responsibility to enter incidents into CHRIS. 4. 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. 5. Date backups were/will be trained/reeducated on entering information into CHRIS including deadlines. 6. Staff by title who serve in the Delta roles- Administrator, Security Officer and Supervisor. 7. 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 PR) 09/26/2023 Provider's Administrator and Security Officer is the same person, which is the Executive Director. The Supervisor is the backup. The Executive Director was on vacation and it was the Supervisor who was locked out of the system, in which Provider previously submitted	

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			for this CAP to demonstrate attempts made to reset password. The Executive Director knows how to reset passwords, but was out of the office. Moving forward, the Supervisor will be given permission to reset passwords. OLR) Partially Accepted 09/26/2023 In addition to the above, the provider response needs to include the following: 1. 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. 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. 3. Indicate the frequency for monitoring the plan including how it will be monitored (Ex: daily checks, monthly audits, weekly chart reviews, quarterly checklist). PR) 10/02/2023 The Administrator will monitor password changes on a quarterly basis. OLR) Accepted 10/02/2023	

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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