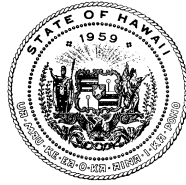


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In reply, please refer to:

File:

Medicaid I/DD Waiver
Memo No.: FY2025-04
Date: February 18, 2025

TO: Medicaid I/DD Waiver Providers

FROM: Mary Brogan, Administrator
Developmental Disabilities Division

SUBJECT: Unreported Adverse Event Reports (AERs) – Changes to AER Submission and Review Process

The purpose of this memo is to inform you of important updates and changes regarding the reporting and management of Adverse Event Reports (AERs) within the Developmental Disabilities Division (DDD). These changes are in response to the Centers on Medicare and Medicaid Services (CMS) Ensuring Access to Medicaid Services Final Rule (CMS-2442-F).

These updates are meant to support a structured approach for the timely, accurate reporting, and follow-up on unreported adverse events for individuals enrolled in the DDD program. DDD has implemented a process that utilizes Medicaid claims data to identify unreported adverse events; these shall be reviewed by case managers and may require follow up with providers. The process also identifies individuals who have had an increase in risk level in the past month; the change in risk level may need to be addressed through updates to the Individualized Service Plan (ISP) and/or Individual Plan (IP). These updates are essential for maintaining the health and safety of the individuals we serve.

DDD shall be implementing this process in late February and will support providers during and after the rollout.

Key Changes & Actions:

1. Case Manager Review of Unreported AERs:

- If an AER is identified through Medicaid claims and an AER is not submitted within the required timelines, it will be flagged as potentially unreported in the INSPIRE system and the case manager shall take follow-up actions.
- Case managers shall contact the primary point of contact for verification of the adverse event and determine the provider's role in reporting the event.

2. Provider Follow-up Actions:

- If instructed by the case manager, the provider shall submit a written AER through the Provider Portal and shall check off the new "Unreported AER" checkbox.

3. Risk Level Review and Follow-up:

- Case managers shall assess any changes in the risk level of an individual based on recent adverse events and update the ISP as needed to address new risks.
- The case manager may request that the provider update the IP to ensure supports are in place to address the increase in risk.

4. Performance Monitoring and Corrective Actions for Non-compliance:

- Failure by a provider to submit AERs within required timelines may result in corrective actions.
- The Community Resources Branch (CRB) shall regularly monitor AER compliance, and reviews shall be conducted to assess provider performance. Providers who fail to meet these requirements may face sanctions, as outlined in the **Waiver Standards, Section 3.10 - Accountability and Sanctions**.

Action Required:

We ask that you familiarize yourself with the updated procedures and ensure that your team is ready to comply with these changes. Specifically, please ensure that all staff involved in the reporting process are aware of their responsibilities and timelines for submitting AERs.

Providers and case managers are critical in ensuring the well-being of individuals receiving services, and your timely submission of AERs is essential to our collective efforts in safeguarding individuals' health and safety.

If you have any questions or need additional guidance, please contact your assigned case manager or the CRB at doh.dddcrb@doh.hawaii.gov.

Thank you for your continued collaboration in supporting the health and safety of individuals within the DDD program.

c: Jon Fujii, DHS-MQD
Victorino Tolentino, DHS-MQD
DDD Management Team