



INFORMATIONAL LETTER NO. 2480-MC-FFS

DATE: June 27, 2023

TO: Home- and Community-Based Services (HCBS) Waiver and State Plan HCBS Habilitation, Case Managers, Targeted Case Managers, Care Coordinators, Money Follows the Person (MFP), Managed Care Community-Based Case Managers

APPLIES TO: Managed Care (MC), Fee-for-Service (FFS)

FROM: Iowa Department of Health and Human Services (HHS), Iowa Medicaid

RE: Critical Incident Reporting Changes

EFFECTIVE: July 1, 2023

As a condition of participation in the medical assistance program, HCBS waiver and habilitation providers must comply with the requirements of Iowa Administrative Code (IAC) 441 – Chapter 77.25(3) – incident management and reporting. Additionally, case managers, targeted case managers, integrated health home (IHH) care coordinators, and community-based case managers are required to submit an incident report when an incident has been witnessed or discovered.

EXCEPTION: The conditions in this subrule do not apply to providers of goods and services purchased under the consumer choices option, or providers of home and vehicle modification, home-delivered meals, or personal emergency response.

Currently, critical (also known as “major”) incident reports are reported to a member’s managed care organization (MCO); or for FFS members and those receiving MFP funding, through the Iowa Medicaid Portal Access (IMPA) using Iowa Medicaid Critical Incident Report – Form 470-4698.

Effective July 1, 2023, critical incidents for all HCBS waiver, habilitation, and MFP members will be reported through direct entry into a new application in IMPA. Iowa Medicaid Critical Incident Report – Form 470-4698 will no longer be used to report incidents after this date.

If you or your organization are not registered for the current critical incident application in IMPA, please complete the [registration form](#)¹. If you are registered with access to the current critical incident application in IMPA, you will be automatically granted access to the new application. However, if you have not logged into IMPA in the last two years, you may need to re-register.

A quick start critical incident user manual will also be available in IMPA to assist in using the new secure application. Training and frequently-asked questions (FAQ) will be updated and made available soon.

Note that [Informational Letter \(IL\) 2128-MC-FFS](#)² informs critical incident reporters that the definition of a major incident as “an occurrence involving a member during service provision” was changed to “an occurrence involving a member enrolled in HCBS waiver, targeted case management, or habilitation services.” All major incidents must be reported by the case manager or service provider who first becomes aware of the incident, regardless of when or where the incident occurred. The definitions of major and minor incidents have not otherwise changed.

“Major incident” refers to an occurrence involving a member who is enrolled in HCBS waiver, targeted case management, or habilitation services, and that:

- results in a physical injury to or by the member that requires a physician’s treatment or admission to a hospital,
- results in the death of the member,
- results in emergency mental health treatment for the member,
- results in the intervention of law enforcement,
- results in a report of child abuse pursuant to Iowa Code section 232.69 or a report of dependent adult abuse pursuant to Iowa Code section 235B.3,
- constitutes a prescription medication error or a pattern of medication errors that leads to the outcome in bullets 1, 2, 3, and 5 above, or
- involves a member’s provider staff, who are assigned protective oversight, being unable to locate the member.

¹ <https://secureapp.dhs.state.ia.us/imp/Default.aspx>

² <https://secureapp.dhs.state.ia.us/IMPA/Information/ViewDocument.aspx?viewdocument=4b4c6ad2-7325-4115-8d70-92b6f2d3ce27>

“Minor incident” refers to an occurrence involving a member who is enrolled in HCBS waiver, targeted case management, or habilitation services that is not a major incident, and that:

- results in the application of basic first aid,
- results in bruising,
- results in seizure activity,
- results in injury to self, to others, or to property, or
- constitutes a prescription medication error.

Please submit any questions regarding this IL to HCBSwaivers@dhs.state.ia.us.