Policy Clarification

Issue Clarification: #02-07
Date of Issue: 10-05-07

Submitted by: Don Panto
County Authority: Lehigh County
Topic Area: Quality Management

Applicability: All Zones
Source: DOH
Regulations: PS&R; PA Code

Question:

Is there any guidance on adverse incident reporting requirements for Drug and Alcohol providers who deliver services under a BDAP license and are reimbursed in the HealthChoices program?

Background:

In the HealthChoices Program Standards and Requirements, section II. 5. G., the BH-MCO is required, as part of the QM plan, to monitor and report areas of service delivery including adverse incidents. A Drug and Alcohol provider has questioned the BH-MCO requirement to report adverse incidents when the content of the report (member’s name) may be in conflict with what is allowed by Code 255.5.

OMHSAS Answer/Response:

Section II. 5. G. (b) of the HealthChoices Program Standards and Requirements states that as part of the Quality Management Plan the BH-MCO should report adverse incidents. However, the information shared must be congruent with current PA State Regulation 4 Pa. Code 255.5. Therefore, D&A providers should report incidents but not provide any client names or other data which reasonably may be utilized to identify the client.

Additionally, the Department of Health (DOH) Division of Drug and Alcohol Program Licensure is the licensing authority for D&A programs. The Bureau of Drug and Alcohol Programs (BDAP) does not license Drug and Alcohol Programs. DOH Licensing has requirements, under Licensing Alert # 5-97 (attached), regarding adverse incident reporting which is congruent with PA State Regulation 4 Pa. Code 255.5 and does not require the reporting of a member’s name.

[Signature]
Director, Bureau of Policy and Program Development

10-25-07
Date

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