Louisiana Did Not Fully Comply With Federal and State Requirements for Reporting and Monitoring Critical Incidents Involving Medicaid Beneficiaries With Developmental Disabilities

What OIG Found
Louisiana did not fully comply with Federal Medicaid waiver and State requirements for reporting and monitoring critical incidents involving Medicaid beneficiaries with developmental disabilities residing in community-based settings. Specifically, Louisiana did not ensure that: (1) all hospital emergency room visits were reported as critical incidents and (2) all critical incidents were reported or followed up on, or both, within required timeframes. These issues occurred because Louisiana: (1) did not have a process, such as performing analytical procedures on Medicaid claims data, to determine whether there were unreported critical incidents, and (2) was unaware of the extent to which community-based providers were late in reporting and following up on critical incidents.

What OIG Recommends and Louisiana Comments
We recommend that Louisiana: (1) work with community-based providers on processes to identify and report all critical incidents, (2) perform timely analytical procedures to identify unreported critical incidents, (3) ensure that beneficiaries and their families are properly educated and understand that all hospital emergency room visits are critical incidents, (4) track direct service providers’ and support coordinators’ compliance with the reporting timeframes outlined in the waiver, and (5) correctly track whether direct service providers forward hardcopy critical incident reports to the support coordinator within 24 hours of discovery.

In written comments on our draft report, Louisiana concurred with our first four recommendations but did not concur with our fifth recommendation. For the first four recommendations, Louisiana described corrective actions that it plans to take or has already taken. Regarding our fifth recommendation that it correctly track whether direct service providers forward hardcopy critical incident reports to the support coordinator within 24 hours of discovery, Louisiana stated that with its new critical incident reporting system, direct service providers are now responsible for direct entry of all critical incidents, thus eliminating the need to send hardcopies to the support coordinator. We did not update our recommendation because we have not performed a review of Louisiana’s new system for reporting critical incidents. However, we acknowledge that Louisiana’s implementation of its new critical incident reporting system appears to have addressed the recommendation.