NEW YORK STATE OF OPPORTUNITY. | **Office for People With Developmental Disabilities**

OPWDD is reducing requirements for reporting COVID-19 infections and exposures.

Effective 8/1/2022, the following changes to reporting are in effect:

- **Non-residential programs/services** in OPWDD's system, including but not limited to Day Habilitation programs and Care Coordination Organizations, are no longer required to report COVID-19 statuses for individuals or staff, to the Justice Center or OPWDD. These programs/services must cease phone reporting to the Justice Center and entry of information into OPWDD's Incident Report and Management Application (IRMA). Please note this does not change the requirement to report an individual's death in accordance with Part 624 or Part 625 requirements, whichever is applicable.

- **Certified residential programs/services** in OPWDD's system are still required to report COVID-19 statuses for individuals and staff. This includes presumed positive, positive and deaths. However, these reports are to be made to OPWDD only through direct entry into IRMA. Phone calls to the Justice Center are no longer required and should not continue after this date, except for a report of the death of an individual under the agency's auspices as required by Part 624 regulations. COVID-19 Event/Situations will no longer populate in IRMA based on phone calls to the Justice Center. Providers of residential services must create a new record in IRMA for a COVID-19 status and will continue to provide all of the required information for COVID-19 infections in the IRMA record.

Agencies must comply with the requirements set forth in this document. It is imperative that agencies ensure timely completion of the IRMA entry required per this document.

Please contact the Incident Management Unit if timely IRMA entry/updates become difficult due to high volume of COVID-19 events and you need assistance.

However, the agency must provide all the information required in the Forms in IRMA. (IRMA Forms are discussed in Section B below.)

A. NOTIFICATION OF COVID-19 STATUS

I. *WHAT TO REPORT IMMEDIATELY*

1. All providers of certified residential programs/services must **notify** OPWDD's Incident Management Unit (IMU) (See section A.II) of **the first occurrence of positive or presumed positive COVID-19 status**(as described below) **and all COVID deaths**, for:

    - Any **individual** receiving services in a certified residential program, or
    - Any **staff member** providing services in a certified residential program. Staff member includes the following: agency employees, interns, volunteers, consultants and contractors (including registered providers),and family care providers.

2. <u>**Certified Residences:**</u> Reports of individual or staff positive/presumed positive COVID-19 status **are by program/service**. The agency must **make a report to OPWDD's IMU upon the first occurrence of a COVID-19 positive/presumed positive status for the residential program/service**, see #3 below, and **all deaths of all individuals/staff.** The agency must **enter information about the COVID-19 status of the individual or staff directly into OPWDD's Incident Report and Management Application (IRMA) within 24 hours of occurrence or discovery or by close of the next working day.** A phone report is not required, unless there is a death of an individual under the auspices of the agency, in which case the Part 624 regulations for reporting deaths will still apply.

   All COVID deaths of individuals receiving services must be reported to the Justice Center and/or OPWDD as required by existing OPWDD regulations. Information about COVID-19 suspected deaths of staff providing certified residential services only, must also be provided in the COVID-19 Event/Situation in IRMA.

3. **COVID-19 Statuses requiring reporting in certified residential services as described above:**

   - **The Positive COVID-19 test result**

   - The determination of a **"presumed positive" by** the Local Health Department (LHD), New York State Department of Health (NYS DOH) or the Health Care Provider (HCP).

   - **Any and all suspected COVID-19 related deaths of individuals and staff (e.g. factors to consider are that staff or individual had a positive COVID-19 test result or were presumed positive for COVID-19)**

   - A "**New Subsequent" COVID-19 positive or presumed positive status:** A new COVID-19 positive test or presumed positive status that occurs:
     o Following the conclusion/resolution of all previously reported COVID-19 status(es)
     o Guidelines to consider for determining a new subsequent event:
       - Has the previous Event's quarantine ended, including all quarantines for all individuals/staff of that Event?
       - Are individuals/staff no longer experiencing symptoms?
       - Is anyone currently hospitalized with COVID-19 symptoms?
       - What has the physician caring for the person advised as to whether it is a continuation or a subsequent event?
       - Does LHD see this as a new event?
       - How long ago was the last event?

II. *NOTIFICATION of COVID-19 RELATED DEATHS*

IRMA Entry for *COVID-19 Death*   **Residential Program Staff Member Deaths**
The death of a staff member must be entered in IRMA as a Part 625   **Event-Situation COVID-19 "Coronavirus"**   • If the death is updated information for an existing COVID-19 "Coronavirus" Event-Situation, the staff's passing should be entered in the existing IRMA report, as an update to the staff information.   • If reporting the death is a new/initial entry for the program/service, you will need to create/enter the report into IRMA as a new Part 625 "Coronavirus" event and also provide information about the positive or presumed positive status**.**
IRMA Entry for *COVID-19 Death*   **Death of Individuals receiving certified residential services**
IRMA Entry of a COVID-19 Death   • When a report of death related to COVID-19 is phoned to the JC, the JC will release the XML file of the report to create the incident in IRMA.   • These XMLs will be identified as "COVID-19 Administrative Death" and are auto-populated with the investigation delegated to the NYJC. IMU will change the delegation of the investigation to 'Agency' or 'OPWDD" as appropriate.   If the death was under the auspices of the agency, these reports should be classified as 'Serious Notable Occurrence-Death'.
All individuals whose deaths are reported as related to COVID-19 must have two reports completed in IRMA: 1. **A Serious Notable Occurrence-Death or Event Situation- Death, whichever is applicable to the individual and service received**   **AND**   2. **Event situation COVID-19 "Coronavirus." The ES record also needs to reflect that the individual is deceased.**
Deaths and other required information identified below, must be entered in IRMA within 24 hours or by close of the next working day.

See Next Page For

Additional Guidance on

IRMA Entry related to COVID-19

B. IRMA ENTRY FOR COVID-19

I. *IRMA ENTRY FOR COVID-19 IS REQUIRED IF ANY OF THE FOLLOWING OCCURS:*

- **Reports of the COVID-19 Statuses for individuals and/or staff identified on pages 1-2 of this document, i.e.** Positive COVID-19 test results, presumed COVID-19 positive determinations - COVID-19 related death.

II. *TIME FRAMES FOR COVID-19 IRMA ENTRY:*

- **Entry of initial reports of information** for individuals and staff by providers of certified residential services **must occur within 24 hours or by close of the next working day.**

- **Entry of subsequent information must occur within 24 hours by close of the next working day** of initial reports or reports of death, all subsequent information and status updates for individuals or staff, for previously entered COVID-19 events.

III. *HOW TO ENTER COVID-19 EVENT IN IRMA:*

- COVID-19 reports must be documented in IRMA as Part 625 events.

- Enter COVID-19 reports under the Part 625 Event/Situation classification, as indicated below:

Part 625 Event/Situation classification of **ES - COVID-19 "Coronavirus"**
Certified Residential Programs/Services Follow these steps to enter into IRMA: • Log into the Incident Report andManagement Application (IRMA) • Go to the menu page and select,"ADD INCIDENT*"* • Continue to enter COVID- 19 "Coronavirus" Event information by following ES COVID-19 IRMA Entry Requirements detailed in Attachment A.

IV. *WHAT TO ENTER IRMA:*

1. IRMA entry is by program/service. The certified residential program/service is responsible to maintain an IRMA record for the individuals and staff that have a positive or presumed positive COVID-19 status, or death related to COVID-19.
   o The unique statuses of multiple individuals and staff can be documented in one IRMA record.
   o The names of the individuals involved are entered in the Individual Tab.
   o The staff members involved are entered in the Incident Details Tab, Involved Persons Sub-tab. The type "Staff, Staff" must also be added to the Individual Tab to indicate that a staff member is COVID-19 positive or presumed positive. All involved staff members must be added as the "type" of person present. This action generates the form for the staff members.

2. Individual and Staff Forms will generate when the individual and staff are listed in the Event as follows:
   o The certified residence is responsible to complete the Forms for individuals receiving services, the Individual Forms will generate for these services.
   o Staff Forms will generate when the staff is listed in the Involved Persons Subtab. Each provider will need to complete a Staff Form for the staff listed in the Event.
   o A Program Form will also generate for each certified residential program/service when the Event for that program/service is created. The Program Form is not required.
      ▪ The number of Individual and Staff Forms that appear will correspond to the number of individuals entered in the Individual Tab and the staff members entered in the Involved Persons Tab.
         – Only individuals and staff who **meet the criteria** for reporting should be documented in IRMA and Forms completed. The criteria for reporting/entry in IRMA is the following:

            o **Positive Test for COVID-19** for any individual or staff of the facility or program

            o A Local Health Department (LHD) or Health Care Provider (defined as physician, physician's assistant or nurse practitioner) or NYS DOH determination of an individual as *presumed positive* **for COVID-19.**

      - The Individual and Staff Form is ONLY required for those who have passed away, tested positive or are presumed positive.

   o **Information to Document for Initial IRMA Entry:** The Forms referenced above provide **specific fields to guide you to enter the information necessary** and make it clear where and how the information can be documented.

      ▪ **Currently, the COVID-19 Individual Form required fields are:**
         • **Individual is currently under (Select Mandatory Isolation for positive or presumed positive individuals)**
         • **Start Date of Isolation/Quarantine**
         • **Actual End Date of Isolation/Quarantine**
         • **Has the Individual been Hospitalized?**
            • **Hosp Start Date**
            • **Hosp End Date**
            • **Will the individual be discharged to program?**
         • **Is the individual presumed positive?**
         • **Was the individual tested?**

- Date of test
- Test Results
- **Has the individual passed away?**
  - **Please enter approx. date if exact date is unknown.**
  - **Location of Death**

- **Currently, the COVID-19 Staff Form required fields are:**
  - **The person is currently under (Select Mandatory Isolation for positive or presumed positive staff)**
  - **Date of Birth**
  - **Start Date of Isolation/Quarantine**
  - **Actual End Date of Isolation/Quarantine**
  - **Has the person been Hospitalized?**
    - **Hospitalization Start Date**
    - **Was the person discharged?**
    - **Hospitalization End Date**
  - **Is the person presumed positive?**
  - **Was the individual tested?**
    - **Date of test**
    - **Test Results**
  - **Has the individual passed away?**
    - **Please enter approx. date if exact date is unknown.**

o **An IRMA update must be made with each change in status for an individual and/or staff member who is COVID-19 positive or presumed positive. Upon entering the update, the agency is responsible to note that an update was made in the "Conversation to-date" section in IRMA.**

o **Updates and Status Change Information to Document in IRMA entry**. **The status of programs and people regarding COVID-19 will be changing over time.** The Forms referenced above provide specific fields to guide your entry and make it clear where and how the information can be documented.

Please direct your questions related to reporting in IRMA to 518-473-7032 or
incident.management@opwdd.ny.gov