

## GOVERNMENT OF THE DISTRICT OF COLUMBIA DEPARTMENT ON DISABILITY SERVICES

Andrew Reese, Director One Independence Square 250 E Street, SW, Washington, DC 20024 202.730.1700 | www.dds.dc.gov

## DDS TRANSMITTAL #23-01

TO:	All Developmental Disabilities Administration (DDA) Residential and Day Service Providers, BSP Clinicians, and Service Coordinators
FROM:	Shasta Brown, Deputy Director, Quality Assurance and Performance Management Administration (QAPMA)
CC:	Jose Castrillo, Supervisory Quality Improvement Unit Tiffani Nichole Johnson, Rights and Advocacy Specialist, Office of Rights and Advocacy (ORA)
DATE:	February 1, 2023
RE:	Behavior Support Plan Approval Timeline & Process for Uploading Supporting Documentation

The Department on Disability Services (DDS), Developmental Disabilities Administration (DDA), releases this transmittal to inform the provider community of the timeline and processes for submitting an annual Behavior Support Plan (BSP) and supporting documentation for approval by the Restrictive Control Review Committee (RCRC). Effective March 1, 2023, the annual BSP and supporting documentation must be uploaded at least 60 calendar days prior to the effective date of the Individual Support Plan (ISP). This is a result of myriad requests for 45 days temporary approvals received by the Office of Rights and Advocacy (ORA) due to a delay in uploading the required documentation for timely approval of the BSP.

Provided below are the steps to ensure the BSP is approved prior to the ISP effective date.

## 1. Identify the BSP due date

- a. Review the Provider's dashboard. (Figure 1.a)
- b. Click on the number to open the report. (Figure 1.a)
- c. Review the column titled, BSP due date, to identify the BSP's that are due 60 calendar days prior to the ISP effective date. (Figure 1.b)



## (Figure 1. a)- MCIS location: MCIS>Provider Dashboard



### (Figure 1.b)-BSP due date report:

 Person
 BSP Start Date
 BSP End Date
 ISP End Date
 ISP End Date
 BSP Due Date
 Provider Committed Date
 Approval Date
 Approval Type

 Jane Doe
 5/9/2022 0:00
 5/8/2023 0:00
 5/9/2022 0:00
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 3/9/2023 0:00
 3/9/2023 0:00
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2. Compile and review the following documentation for BSP approval

a. Required documents:

- a. BSP<sup>1</sup>
- b. Evidence of Informed Consent BSP Consent Form
- c. Evidence of Staff Training Proof of Staff Training (Across all Settings; Day and Residential)
- d. Evidence of Provider Human Rights Committee Review and Approval Provider Human Rights Committee Minutes
- e. Three Months of Behavior Data- Last three months of Behavioral Data (Across all Settings; Day and Residential)
- f. Last Two Psychiatric Medication Reviews
- g. Evidence of Informed Consent for Psychotropic Medication- Psychotropic Medication Consent Form
- b. Review the above documents to ensure compliance with DDS policies and procedures.
- c. Prepare to upload the BSP and supporting documentation. The required documentation must be available prior to initiating the RCRC for the approval process.

<sup>&</sup>lt;sup>1</sup> <u>Behavioral Support Plan Requirements Procedure | dds (dc.gov)</u>



# **3.** How to initiate the approval process and upload a new BPS and supporting documentation.

- a. Ensure that the BSP and supporting documentation are available. (Do not start the process with missing and/or inaccurate documentation.)
- b. Go to MCIS> Person>Medical Information (green tab) > BSP (Figure 2.a-d)
- c. Click New (blue button)
- d. Complete all the fields in the form and click Save (green button)

### (Figure 2.a-d.) - MCIS Location: MCIS >Person>Medical Information> BSP

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e. Upload the BSP and supporting documentation, please click Upload New Files. (Figure 3.a)



Person	*Effective Date: 4/6/2022 *Expiry Date: 4/5/2023
	*BSP Developer: TEST
	BSP Informed Consent Date: 3/22/2022 Approval Date by Provider Human Rights Committee: 3/17/2022
Medical Information	*Type of BSP: Commit Date: 3/22/2022
COVID Vaccine Entry	□ 1:1 Behavioral Staffing
Diagnoses	It:1 Non-Behavioral Staffing Individualized housing
Medical Coverages	<ul> <li>Individualized Staffing (Behavioral &amp; Greater than 1:1)</li> </ul>
HRAC	O Non-restrictive BSP Other Other
BSP	Physical Restraints
Health Passpor	Psychotropic Medication Request for Exemption
Health List	Sedation Order/ Desensitization Plan
Observations	Number of Medications: 5  Psychotropic Medications Informed Consent Date: 3/25/2021
SFA/NBFR	esychiatric assessment Date: 1/12/2022
	Upload New File
	File Section - BSP

## (Figure 3.a) - MCIS Location: MCIS >Person>Medical Information> BSP

- f. Once BSP and supporting documents are uploaded and committed, a committal date is assigned.
  - (Figure 4.a) MCIS Location: MCIS >Person> Medical Information>BSP

A Person Prov	ider Incident QA Profile Intake Search Reports Administration Budget Duty Officer Logout
	Your session will expire in 01:23:49
	Provider: Provider Facility: Supported Living Address:
	BSP This BSP already has a 45 day Extension please check history at bottom of this page Cancel
Person	
Operations	*Effective Date: 4/6/2022 ** Expiry Date: 4/6/2023
ISP	*BSP Developer: Tanya Lockwood   Staff Training Date: 3/14/2022
Medical Information	BSP Informed Consent Date: 3/22/2022 Approval Date by Provider Human Rights Committee: 4/17/2022
COVID Vaccine Entry	"Type of BSP: Commit Date: 3/22/2022
Diagnoses	1:1 Behavioral Staffing
Medical Coverages	
HRAC	Individualized Staffing (Behavioral & Greater than 1:1)     Committal Date
BSP	Non-restrictive BSP
Health Passport	Other
Health List	Physical Restraints
Observations	Psychotropic Medication
SFA/NBFR	Request for Exemption
Forms	Sedation Order/ Desensitization Plan
	Number of Medications: 5   Psychotropic Medications Informed Consent Date: 3/25/2021  Psychiatric assessment Date:
	1/12/2022

## 4. BSP Pre-review and scheduling the date to review the BSP

a. Once the BSP is committed to MCIS (Figure 4.a above), ORA will be notified via email. The ORA will conduct a BSP Pre-Review within seven (7) calendar days of receiving the email notification that a BSP has been committed in MCIS (Figure 5.a). During the ORA pre-review process, the Rights and Advocacy Specialist (RAS) will review BSPs or Requests for Exemption to ensure they comply with DDS policies and procedures. If

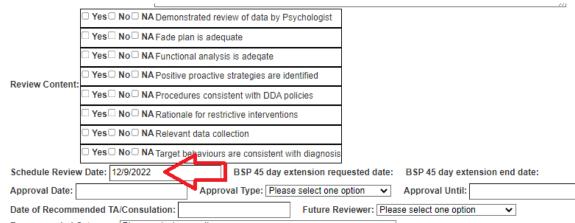
GOVERNMENT OF THE DISTRICT OF COLUMBIA technical deficiencies are found within the BSP, Request for Exemption, and/or supporting documents, an issue will be entered for each deficiency. Providers are required to upload the supporting documentation to close the issue by the assigned due date. Once all documentation complies with DDS policies and procedures, the BSP or the Annual Request for Exemption will be scheduled for RCRC review, and the issue will be closed and resolved prior to the RCRC meeting.

#### (Figure 5.a) - MCIS Location: MCIS >Person> Medical Information>BSP

<b>f</b>	Person	Provider Incider	t QA	Profile	Intake	Search	Reports	Administration	Budget	Duty Officer	Logout	
											Your session will ex	pire in 01:25:02
		Person Name:		Hab	Case#:	SC:		Person Type: 2-1	37 Waive	r Type: Waiver	Person Status: Eligible	3708
		Provider:		F	Provider F	acility: Sup	ported Livi	ng Address: 3				
		BSP View BS	P Pre-revi	iew Tool	BSP pre-r	eview comr	mit date:13	2/22/2022		45-day Tem	porary BSP Requests	Cancel
Persor	ı	*E	ffective D	ate: 7/6/20	022		1			*Expiry	Date: 7/5/2023	
Opera	tions	1	SP Start D	ate: 8/15/2	2022		i			ISP End	Date: 8/14/2023	
ISP		*B	SP Develo	per: (			•			Staff Training	Date: 7/28/2022	
Medica	al Informat	on BSP Informed Date:	Consent	8/8/2	022			opproval Date by Pro committee:	vider Hum	an Rights	7/16/2022	
COVID	Vaccine Ent	*Type of BSP:								Commit Dat	e: 10/3/2022	

b. The RCRC review date will be entered into the BSP section of MCIS (Figure 5.b.). The system will reflect the date that the BSP is scheduled to be reviewed by the RCRC, and it will also send an electronic notification. The RCRC meeting to review the BSP will occur at least 20 calendar days prior to the ISP/BSP effective date.

# (Figure 5.b.) - MCIS Location: MCIS >Person> Medical Information>BSP> RCRC Section





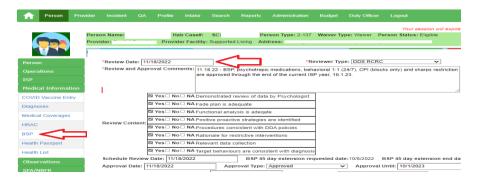
### 5. Period to resolve/close issues enter during the BSP-Pre-Review process

- a. If there is missing documentation resulting from the BSP Pre-review, MCIS issues will be entered into the system. The provider will have from 15 to 30 calendar days to upload the documentation to resolve/close all issues. ORA will review the compliance of documents required within three (3) business days of receipt, to close or request additional documentation from the provider, if needed.
- b. DDS may impose sanctions on providers who do not comply with the DDS Behavior Support Policy.<sup>2</sup>

## 6. RCRC review of the BSP

- a. The RCRC meeting occurs at least 20 calendar days prior to ISP/BSP effective date.
- b. Once the RCRC reviews the BSP and supporting documentation, the RCRC section will be updated to include the outcome of the RCRC review (approved, rejected, deferred, etc.)<sup>3</sup>, the length of approval, if applicable, whether additional documents or revisions to the BSP are required, and if so the revision due date.
- c. ORA will enter a note in the comments section within one (1) business day of the RCRC review meeting (Figure 6.a).

## Figure (6.a) - MCIS Location: MCIS >Person> Medical Information>BSP, Review and Approval Comments



For more information regarding this guidance, please contact the Office of Rights and Advocacy, Rights and Advocacy Specialist, Tiffani Nichole Johnson, 202.730.1802, tiffani.johnson@dc.gov.

<sup>&</sup>lt;sup>3</sup> Please refer to the RCRC Policy for definitions of what each RCRC outcome means.



<sup>&</sup>lt;sup>2</sup> Imposition of Sanctions Policy