




GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT ON DISABILITY SERVICES

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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 Start 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	5/8/2023 0:00	3/9/2023 0:00			

2. Compile and review the following documentation for BSP approval

a. Required documents:

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

¹ [Behavioral Support Plan Requirements Procedure | dds \(dc.gov\)](https://dds.dc.gov/behavioral-support-plan-requirements-procedure)

3. How to initiate the approval process and upload a new BSP and supporting documentation.

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

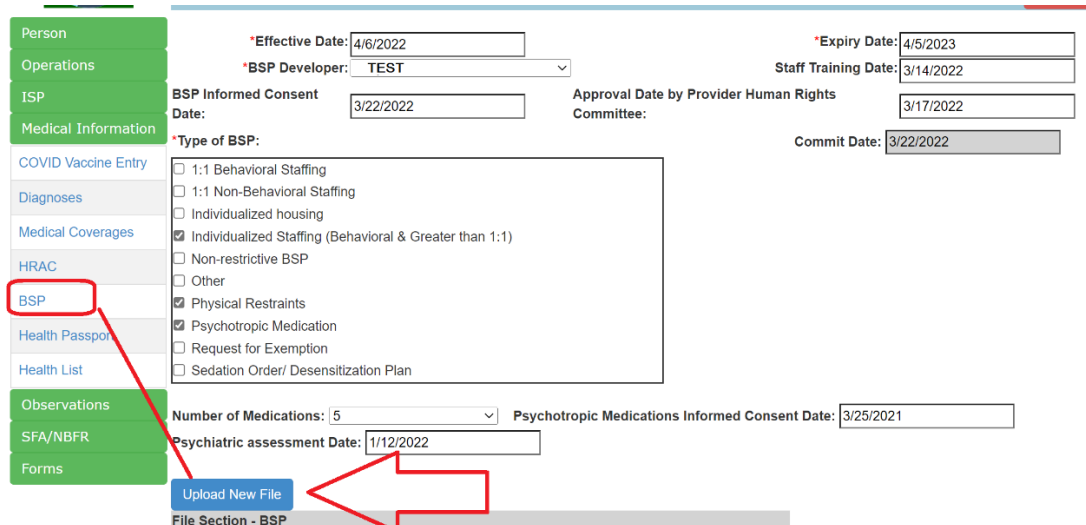
(Figure 2.a-d.) - MCIS Location: MCIS >Person>Medical Information> BSP

The first screenshot shows the MCIS navigation menu on the left. The 'Medical Information' tab is highlighted with a red arrow. Below it, the 'BSP' option is also highlighted with a red arrow. The top navigation bar includes links for Person, Provider, Incident, QA, Profile, Intake, Search, Reports, Administration, Budget, Duty Officer, and Logout. The top right corner displays a session expiration warning: 'Your session will expire in 01:26:49'.

The second screenshot shows the BSP form. The 'BSP' tab is selected in the left menu. The form includes fields for Person Name, Hab Case#, SC: Service Coordinator, Person Type, Waiver Type, Provider, Provider Facility, and Address. A red arrow points to the 'New' button. Below the form fields, there are checkboxes for various BSP types: 1:1 Behavioral Staffing, 1:1 Non-Behavioral Staffing, Individualized housing, Individualized Staffing (Behavioral & Greater than 1:1), Non-restrictive BSP, Other, Physical Restraints, Psychotropic Medication, Request for Exemption, and Sedation Order/ Desensitization Plan. The bottom right corner features a 'Save' button and a 'Cancel' button. The top right corner shows a session expiration warning: 'expire in 01:23:05'.

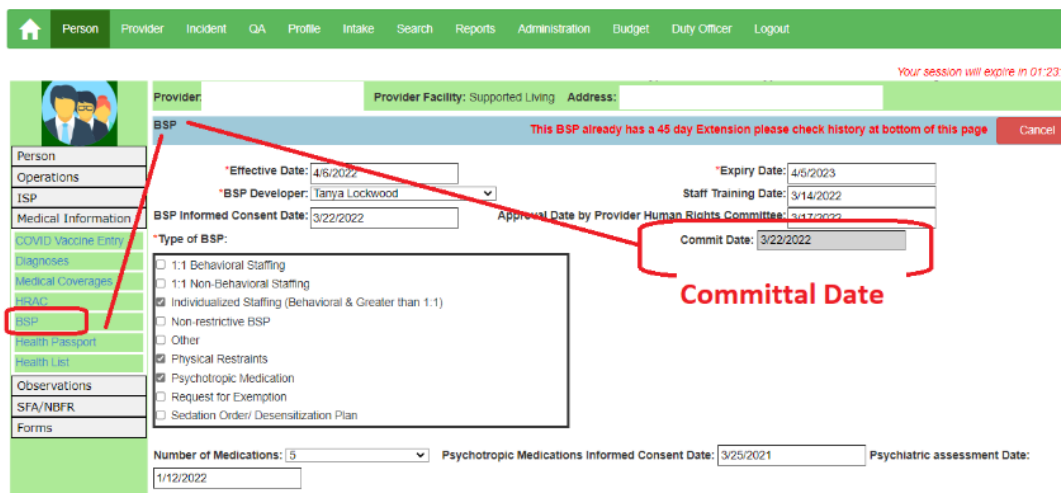
- Upload the BSP and supporting documentation, please click Upload New Files. (Figure 3.a)

(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



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

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. 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

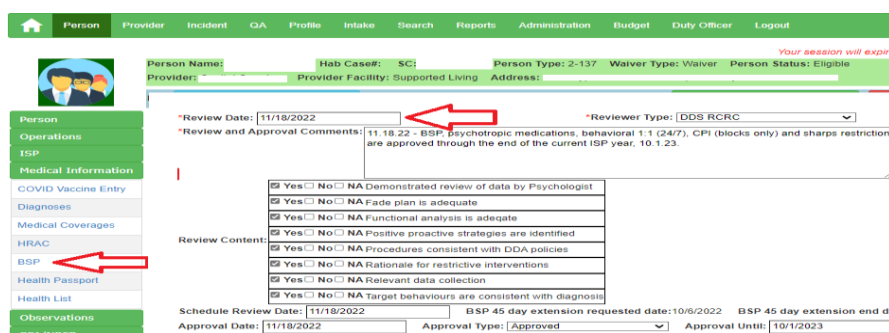
5. Period to resolve/close issues enter during the BSP-Pre-Review process

- 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.
- DDS may impose sanctions on providers who do not comply with the DDS Behavior Support Policy.²

6. RCRC review of the BSP

- The RCRC meeting occurs at least 20 calendar days prior to ISP/BSP effective date.
- 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.)³, the length of approval, if applicable, whether additional documents or revisions to the BSP are required, and if so the revision due date.
- 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.

² [Imposition of Sanctions Policy](#)

³ Please refer to the RCRC Policy for definitions of what each RCRC outcome means.

