



GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department on Disability Services
Developmental Disabilities Administration

MEMORANDUM

TO: All Providers

FROM: Laura L. Nuss, DDS Director 

RE: Revised Incident Management and Enforcement Unit (IMEU) Investigations Procedure No.: **2013-DDS-QMD-PR007 (Rev)** and Recommendations Procedure No.: **2013-DDS-QMD-PR008**

DATE: March 2, 2015

This memorandum provides guidance on DDS's revised IMEU Procedures. The Procedures are effective immediately and will be posted on the DDS web site shortly.

Key revisions to the IMEU Procedures include the following:

- **Investigations Procedure**

Section 3a, General Provisions – The provider should ensure that supervisory staff are available to advise, guide and support people who receive services from DDA, the provider's direct support staff, and any DDA official, during an emergency that may occur outside of the provider's regular business hours; and that people who receive services from DDA and their support teams are aware of how to request after hours assistance.

Section 9 - Any complaint against DDS staff involving a person receiving services from DDS shall be reported to the IMEU Supervisory Investigator.

Sections 9a - IMEU Supervisory Investigator will notify QMD Director and refer to DDS Human Resources.

- **SRI's involving Abuse, Neglect, Exploitation and Serious Physical Injury**

Section 2c - Providers shall not investigate SRI's pertaining to abuse, neglect, exploitation or serious physical injury, unless otherwise required by law or regulations. However, the IMEU Supervisory Investigator reserves the right to direct the provider to cease any investigative activity, until IMEU has collected sufficient evidence.

Section 2d ii - In all other instances, an assigned IMEU Investigator shall conduct an on-site visit within 72 hours of assignment to ensure people are safe, secure evidence, identify the target(s) of the investigation, and confirm with the provider whether anyone affiliated with the provider must be removed from direct contact with people supported by DDA.

Section 2d vii - The IMEU Supervisory Investigator will review the investigation within five (5) calendar days, and if approved, close the investigation. If the investigation warrants further investigative activity, then the investigation will remain open until sufficient evidence is collected for closure.

- **Rating System for Provider Investigations & Certification of Providers to Conduct for Independent Investigations**

Section 3 - The provider must continue to submit reports to IMEU for scoring and continue to achieve ratings of three (3) or better to maintain qualification to conduct independent SRI investigations. If a provider who had been previously authorized to conduct independent investigations fails to obtain a rating of three (3) or better for three (3) consecutive investigations, fails to submit timely for three (3) consecutive investigations or 80% of all investigations (for ratings below three or poor on-time percentage) within a twelve-month period, the provider will have its authority revoked. In order to regain authorization to complete SRI investigations without DDA oversight, provider investigations would be required to obtain a rating of three (3) or better for five (5) consecutive investigations.

Section 4 - Qualified Providers shall have 15 calendar days to submit their report of investigation to IMEU.

- **Incident Recommendations Procedure**

Section 3a, DDS Investigations Recommendations, Section 4 - If an extension is needed to satisfy any recommendation, the responsible provider staff should provide a written notification, via electronic mail, to the assigned Compliance Specialist. The request must be uploaded in MCIS and include the reason for the extension.

Section 5 - The assigned Compliance Specialist shall respond within two (2) business days of receiving the request for an extension.

- **Requests for Reconsideration**

Section 3 - The IMEU Supervisory Investigator shall respond to all appeal requests, via electronic mail, within 15 business days of receiving the request. The IMEU Supervisory Investigator's written response shall be DDA's final administrative decision regarding the appeal.

Section 4 - Recommendations for Corrective Action may be stayed during the appeal process, if formal request for extension is made by the provider.

Please review the revised IMEU Procedures carefully. DDS will review the revisions at the respective Provider Leadership and Incident Management Coordinator meetings. You may also direct questions to Bryan Chase, Supervisory Investigator, at bryan.chase@dc.gov or (202) 730-1523. Thank you.