

**Incident Management System
Respondent/ Topic Area/DDSD Response**

Public Respondent	Feedback	DDSD Response
Survey Monkey	<p>Page 2: Reporting and Evidence Preservation</p> <p>We suggest that the first line be amended to “The DD Waiver provider who suspects or is aware of ANE...”. NMAC requires the first person aware or suspecting a violation of ANE regulations should make the report immediately.</p> <p>In the area “All DD Waiver Providers shall”, sub line 4. States “Ensure the employee, subcontractor or volunteer with knowledge ...”. We would like this sentence to be clarified. At present it appears that this sentence applies to the Provider Agency, not the person with first hand knowledge. Also, many provider agencies report that many direct care staff are intimidated by the process and require support from more experienced staff to complete the process. It also reads that a Provider Agency must ensure that any employee (etc.), even if not their employee ((etc.), reports concern. We would recommend that this section be replaced with the exact wording used in NMAC 7.1.14.8. For example, in sub line 7.a. it states that “taking overall (wide) photographs” or in line 7.c “diagramming the scene” is suggested. This is not required by NMAC and should not be required by the standards.</p>	<p>"The DD Waiver provider who suspects or is aware of ANE, suspicious injury, environmental hazard or death is ultimately responsible for appropriate reporting. All DD Waiver providers shall:" was inserted along with "firsthand knowledge..." , and "Assistance may be provided by an experienced staff or Agency manager."</p>
ADDCP	<p>Page 3: Agency Cooperation</p> <p>Sub line 2. – provide unrestricted access to the DHI....operated by the provider agency. We assume that this exempts Family Living Providers as they are not operated by the provider agency?</p> <p>Sub line 3 and 4. We suggest adding the word “applicable” prior to records. Some documentation, especially personnel records, would not be required for any investigation and the DHI should not be allowed to overstep their authority in these requests which may violate other laws. In sub line 4, the phrase ‘except by prior approval of the DHI’ is not needed.</p>	<p>FLP are exempt. The word "applicable" was added prior to records.</p>

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ADDCP	Page 3: Reports of Death This is the first time IMB appears in this chapter. Was it meant to be IMS? This sentence should also either lay out the process or refer readers to previous section for reporting guidelines. If there is a completely different process in reporting a death versus a violation of ANE, it should be spelled out here.	IMB was changed to "DHI."
ADDCP	Page 3: Corrective and Preventive Action Plans for Substantiated Findings	N/A