

Risk Triggers and Thresholds

Care Concern Thresholds

Office of Licensing

Effective Date: January 1, 2023





Risk Triggers and Thresholds = Care Concern Thresholds

IMU Role in Triaging Incidents

Licensing, Office of Human Rights & Office of Integrated Health Role

Locating the Care Concern Thresholds Report in CHRIS: video and step-by-step

Care Concern Thresholds 2023

Provider Responsibility

Care Concern Thresholds Data

Resource Links and Contacts





Risk Trigger

- Incident or condition that can cause harm to an individual
- Examples: Fall, seizure, UTI, dehydration

Threshold

- Setting an amount, or number, of risks that help determine when further actions may be needed
- Example: Two within a 90-day time-frame

Quick Reference Handout

This information will be posted on the Website.

This is a one-page, quick reference guide for providers that list the Care Concern Thresholds, provides links to regulation and an example tracking chart.



WHAT ARE RISK TRIGGERS AND THRESHOLDS?

A risk trigger is an incident or condition that can cause harm to an individual. Risks triggers can include things such as falls, seizures, urinary tract infections and dehydration. A threshold is setting an amount, or number, of risks that help determine when further action may be needed.

Here is an example of a risk triggers and threshold: two falls within a 30-day time period. The fall is the risk trigger; two within a 30-day time period is the threshold.

WHAT ARE UNIFORM RISK TRIGGERS AND THRESHOLDS AS DEFINED BY THE DEPARTMENT IN 520.D?

DBHDS has defined several risk triggers and thresholds that the Incident Management Unit tracks and triages using the CHRIS system. **These are also known as care concerns (CC).** They are subject to change on an annual basis. Per 520D, providers need to incorporate these CC into the systemic risk assessment process. A provider could include the type, number and date or time frame for CC that have occurred.

Effective 01/2023 the Care Concern Thresholds are:

- Multiple (2 or more) unplanned medical hospital admissions or ER visits for falls, urinary tract infection, aspiration pneumonia, dehydration, or seizures within a ninety (90) day time-frame for any reason.
- Any incidents of a decubitus ulcer diagnosed by a medical professional, an increase in the severity level of a previously diagnosed decubitus ulcer, or a diagnosis of a bowel obstruction diagnosed by a medical professional.
- Any choking incident that requires physical aid by another person, such as abdominal thrusts (Heimlich maneuver), back blows, clearing of airway, or CPR.
- Multiple (2 or more) unplanned psychiatric admissions within a ninety (90) day time-frame for any reason.

PROVIDER RESPONSIBILITIES

Providers need to track, on an ongoing basis, their organization's serious incidents and care concerns. Serious incidents are defined by regulation, 12VAC35-105-20. Definitions: [Virginia Administrative Code - Title 12, Health - Agency 35, Department of Behavioral Health And Developmental Services - Chapter 105, Rules and Regulations for Licensing Providers by the Department of Behavioral Health and Developmental Services](#)

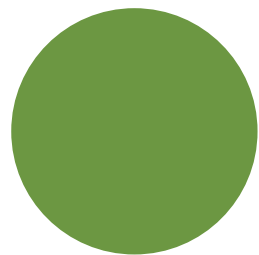
Why track? This helps identify trends and can help with root cause analysis and drive discussions about how to better protect individuals' health and safety.

Below is an example of a chart to track serious incidents and care concerns for one quarter. What are the most common care concerns? What would you do next based on this information?

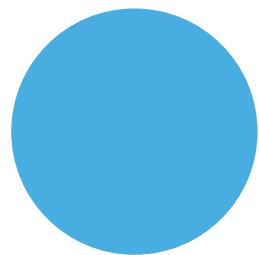
Sample Serious Incident and Care Concern (CC) Tracking Chart

Type of Serious Incident	January	February	March	TOTAL
Falls	3	1	2	6
UTIs	2	1	2	5
Aspiration pneumonia	0	1	1	2
Dehydration	1	0	0	1
Seizures	3	1	1	4
Enc.	0	1	0	1
Care Concern (CC): 2 or more unplanned medical hospital admissions or ER visits for falls, urinary tract infection, aspiration pneumonia, dehydration, or seizures within a 90-day time-frame for any reason	2	1	0	3
CC: Decubitus ulcer (DU)- any dx, increase in severity of diagnosed DU, Dx of bowel obstruction	0	1	0	1
CC: Any Choking Incident	2	0	1	3
CC: 2 or more unplanned psychiatric admissions within a 90-day time-frame for any reason	3	2	4	9

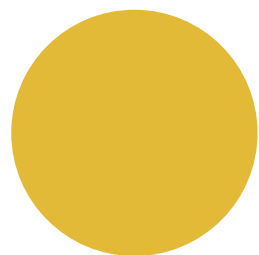
Providers should also develop a root cause analysis policy that identifies additional risk triggers and thresholds for when a more detailed root cause analysis should be conducted. [This is outlined in licensing regulation 160.F.2.](#)



Originated 6/3/2020 after the inception of the Incident Management Unit.



Care Concern Thresholds Criteria was last Revised on 9/2/2021.



Current Care Concern Thresholds Criteria was effective 1/1/2023.



Care Concern Thresholds Criteria are reviewed on an annual basis and revised as recommended.



- Review serious incidents
 - at the individual level.
 - at a system level.
 - to identify possible patterns/trends by an individual, a provider's licensed service as well as across providers.
- Able to identify areas where there is potential risk for more serious future outcomes.
 - May be an indication a provider may need to:
 - re-evaluate
 - review root cause analysis (RCA).
 - consider making more systemic changes.





- OHR is notified, via Care Concern Report by the IMU, of individual care concerns that indicate the possibility of the potential for abuse/neglect.
- OIH is notified, via Care Concern Report by the IMU, of individual care concerns that indicate a potential for a health and safety concern.
- Why?
 - To determine if it would be helpful to follow up with provider to offer information, training, resources or technical assistance.

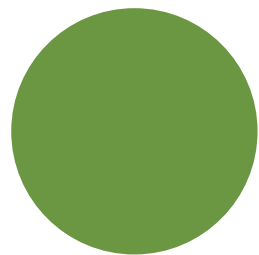


**Doesn't necessarily mean
there is a provider concern.**

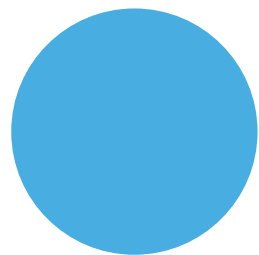
Individuals with higher needs may have a higher number of incidents.



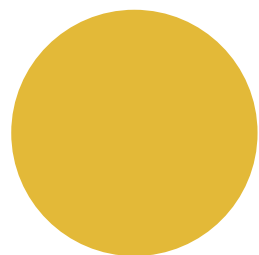
**Doesn't always equate to an
investigation.**



Documented in the “Death/Incident LSA Report” tab located next to the Death/Incident tab in CHRIS



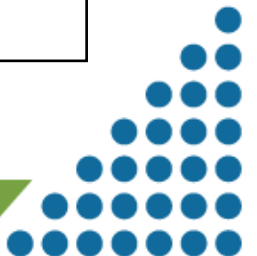
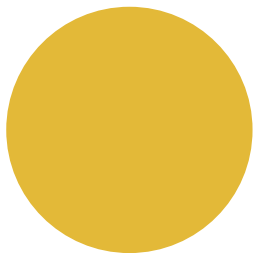
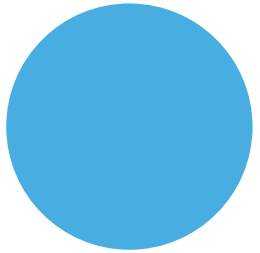
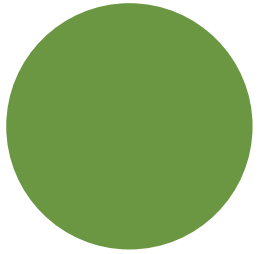
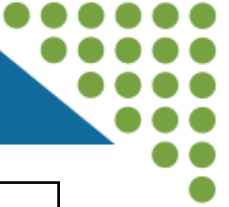
Providers and CSBs can run a report in CHRIS



This is to help provide some trending information for providers to use.

- Another tool providers may use
- Probably consistent with data collected via provider RCA





From the CHRIS homepage click on Serious Incident Reports (highlight) on the left side menu.

CHRIS VERSION 5.1

LOGGED IN AS

- SS91dc4d
- Logout

NAVIGATION

- Home
- Incidents >
- Reports
 - Abuse Reports
 - Complaint Reports
 - Serious Incident Reports**
 - Death Reports
 - Case Manager Reports
- Help



Select a Record by Clicking

By Name-You must enter the individual's first and last names
(This search will display all records that 'sound like' the name you entered.)

By Abuse Case - you must enter the abuse allegation case number

By Complaint Case - you must enter the complaint case number

To report changes to your operating service status related to the state of emergency, please click [HERE](#)

Agency CD:222 , User Role: 24

☐ by Name ☐ by Abuse Case ☐ by Complaint Case ☐ by Death/Incident Case

Case Number

Name (First, Last)

Select report by clicking on the dropdown arrow (see below red arrow).

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- ml85b343
- Logout

NAVIGATION

- Home
- Incidents >
- Reports
 - Abuse Reports
 - Complaint Reports
 - Serious Incident Reports
 - Death Reports
 - Case Manager Reports
 - State Facility OSIG Summary Reports
 - Office of Licensing Reports
 - Consumer Listing
 - Summary Reports
 - Consumer Summary Reports
 - Statewide Summary Reports
 - Death/Injury By Date Range Reports

CHRIS VERSION 5.1

☐ Facility ☐ CSBs ☐ Licensed Provider

Select one of the pre-defined reports below to begin.

**Begin Date****End Date****Waiver Type**

All Waiver and Non-Waiver Records

**Preview Report**

Select the care concern report from the list.
The report will be available in Excel format to download.
Individual Care Concern

CHRIS VERSION 5.1

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- Logout

NAVIGATION

- Home
- Incidents >
- Reports
 - Abuse Reports
 - Complaint Reports
 - Serious Incident Reports
 - Death Reports
 - Case Manager Reports
 - State Facility OSIG Summary Reports
 - Office of Licensing Reports
 - Consumer Listing
 - Summary Reports
 - Consumer Summary Reports
 - Statewide Summary Reports
 - Death/Injury By Date Range Reports

☐ Facility
☐ CSBs
☐ Licensed Provider

Select one of the pre-defined reports below to begin.

DSI-13-Individual Care Concern LSA Notification

SI-01-Status of Serious Incident Cases by Death/Incident Discovery Date

SI-02-Status of Serious Incident Cases by Date DBHDS Notified

Waiver Type

All Waiver and Non-Waiver Records

Preview Report

Click on the calendar to select the data entry date for the begin date and end date text box.

CHRIS VERSION 5.1

LOGGED IN AS

- ml85b343
- Logout

NAVIGATION

- Home
- Incidents >
- Reports
 - Abuse Reports
 - Complaint Reports
 - Serious Incident Reports
 - Death Reports
 - Case Manager Reports
 - State Facility OSIG Summary Reports
 - Office of Licensing Reports
 - Consumer Listing
 - Summary Reports
 - Consumer Summary Reports
 - Statewide Summary Reports

☐ Facility ☐ CSBs ☐ Licensed Provider

Select one of the pre-defined reports below to begin.

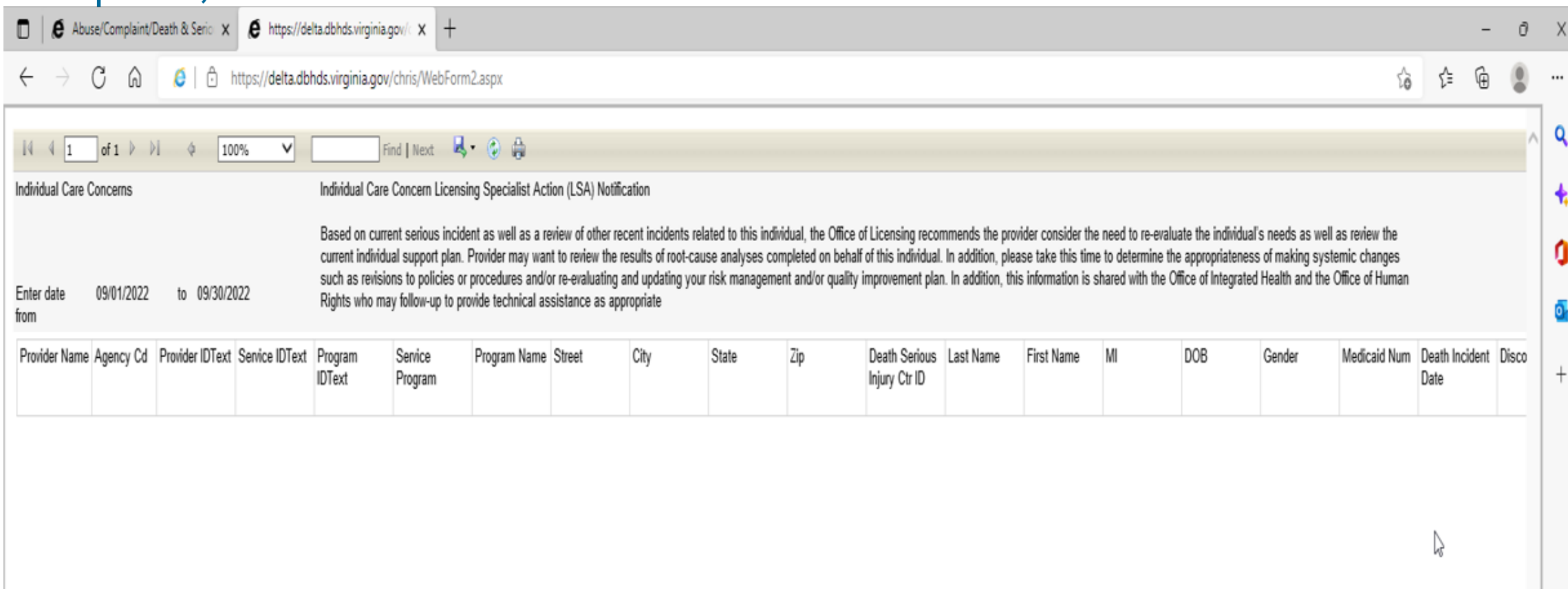
DSI-13-Individual Care Concern LSA Notification

Begin Date 09/01/2022  **End Date** 09/30/2022 

Waiver Type All Waiver and Non-Waiver Records

Preview Report

Report displays on a new tab (highlighted). To close the report, click on the x on the new tab.



Abuse/Complaint/Death & Serious Injury x https://delta.dbhds.virginia.gov/ x

https://delta.dbhds.virginia.gov/chris/WebForm2.aspx

1 of 1 100% Find | Next

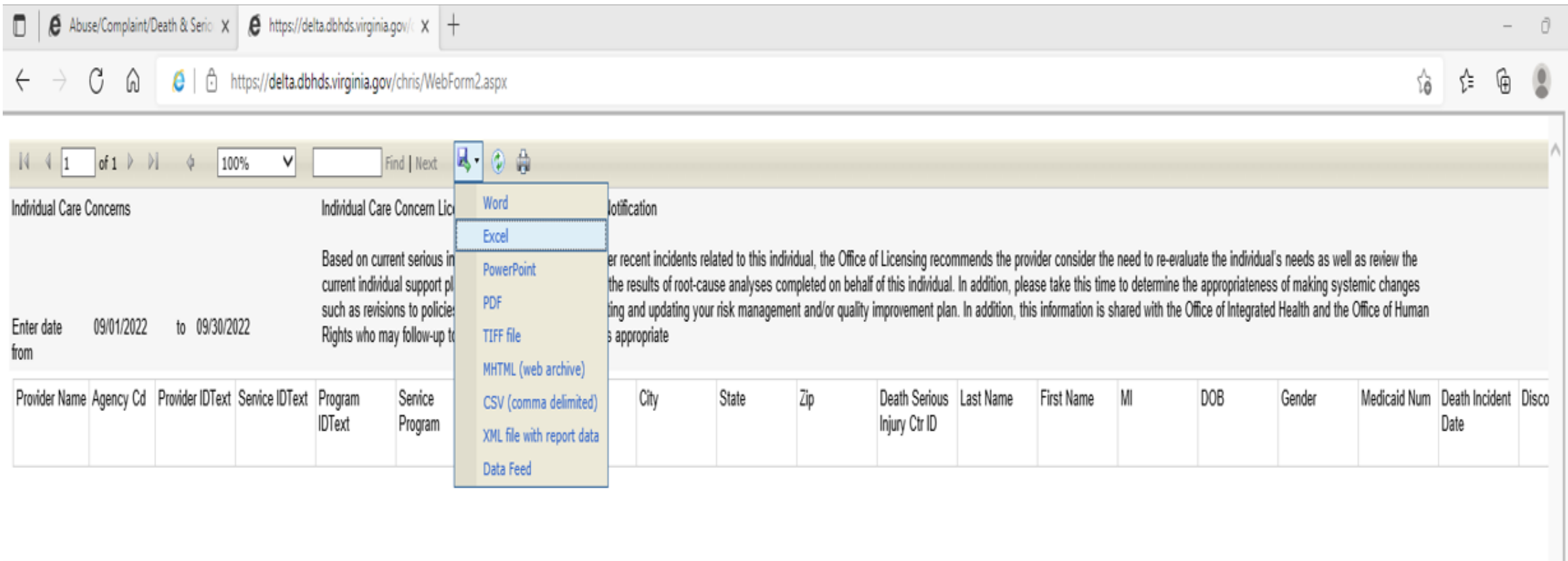
Individual Care Concerns Individual Care Concern Licensing Specialist Action (LSA) Notification

Based on current serious incident as well as a review of other recent incidents related to this individual, the Office of Licensing recommends the provider consider the need to re-evaluate the individual's needs as well as review the current individual support plan. Provider may want to review the results of root-cause analyses completed on behalf of this individual. In addition, please take this time to determine the appropriateness of making systemic changes such as revisions to policies or procedures and/or re-evaluating and updating your risk management and/or quality improvement plan. In addition, this information is shared with the Office of Integrated Health and the Office of Human Rights who may follow-up to provide technical assistance as appropriate

Enter date from 09/01/2022 to 09/30/2022

Provider Name	Agency Cd	Provider IDText	Service IDText	Program IDText	Service Program	Program Name	Street	City	State	Zip	Death Serious Injury Ctr ID	Last Name	First Name	MI	DOB	Gender	Medicaid Num	Death Incident Date	Disco

To save the report. Click on the export button (highlighted) and select Excel. Save excel file.



The screenshot shows a web browser window with the URL <https://delta.dbhds.virginia.gov/chris/WebForm2.aspx>. The page displays a table of Individual Care Concerns. The table has columns for Provider Name, Agency Cd, Provider IDText, Service IDText, Program IDText, Service Program, City, State, Zip, Death Serious Injury Ctr ID, Last Name, First Name, MI, DOB, Gender, Medicaid Num, Death Incident Date, and Disco. The table is currently empty. A dropdown menu is open, showing options for exporting the report: Word, Excel (highlighted), PowerPoint, PDF, TIFF file, MHTML (web archive), CSV (comma delimited), XML file with report data, and Data Feed.

From the CHRIS homepage click on Case Manager Reports (highlight) on the left side menu.

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- Logout

NAVIGATION

- Home
- Incidents >
- Reports
 - Abuse Reports
 - Complaint Reports
 - Serious Incident Reports
 - Death Reports
 - **Case Manager Reports**
- Help



CHRIS VERSION 5.1

Select a Record by Clicking
By Name-You must enter the individual's first and last names
(This search will display all records that 'sound like' the name you entered.)
By Abuse Case - you must enter the abuse allegation case number
By Complaint Case - you must enter the complaint case number

To report changes to your operating service status related to the state of emergency, please click [HERE](#)

Agency CD:224 , User Role: 24

☐ by Name ☐ by Abuse Case ☐ by Complaint Case ☐ by Death/Incident Case

Case Number

Name (First, Last)

Select case management report by clicking on the dropdown arrow (see below red arrow).

CHRIS VERSION 5.1

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- SS91dc4d
- Logout

NAVIGATION

- Home
- Incidents >
- Reports
 - Abuse Reports
 - Complaint Reports
 - Serious Incident Reports
 - Death Reports
 - Case Manager Reports
- Help

Select one of the pre-defined reports below to begin.



Begin Date  **End Date** 

Waiver Type 

Preview Report



Select the care concern threshold report from the list.
The report will be available in Excel format to download.
CM Report - Individual Care Concern

CHRIS VERSION 5.1

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- Logout

NAVIGATION

- Home
- Incidents >
- Reports
 - Abuse Reports
 - Complaint Reports
 - Serious Incident Reports
 - Death Reports
 - Case Manager Reports
 - State Facility OSIG Summary Reports
 - Office of Licensing Reports
 - Consumer Listing
 - Summary Reports
 - Consumer Summary Reports

Select one of the pre-defined reports below to begin.

☐ Facility ☐ CSBs ☐ Licensed Provider

- CM_01A-Case Manager Report - Abuse, Neglect and Exploitation
- CM_01A_EXCEL-Case Manager Report - Abuse, Neglect and Exploitation(EXCEL FORMAT)
- CM_01D-Case Manager Report - Death/Serious Injuries
- CM_01D_EXCEL-Case Manager Report - Death/Serious Injuries(EXCEL FORMAT)
- CM_03_Excel-CM Report - Individual Care Concern LSA Notification**

Preview Report

Click on the calendar to select the data entry date for the begin date and end date text box.

CHRIS VERSION 5.1

LOGGED IN AS

- ml85b343
- Logout

NAVIGATION

- Home
- Incidents >
- Reports
 - Abuse Reports
 - Complaint Reports
 - Serious Incident Reports
 - Death Reports
 - Case Manager Reports
 - State Facility OSIG Summary Reports
 - Office of Licensing Reports
 - Consumer Listing
 - Summary Reports
 - Consumer Summary Reports

☐ Facility ☐ CSBs ☐ Licensed Provider

Select one of the pre-defined reports below to begin.

CM_03_Excel-CM Report - Individual Care Concern LSA Notification

Begin Date
09/01/2022

End Date
09/30/2022

Preview Report

Report displays on a new tab (highlighted). To close the report, click on the x on the new tab.

Abuse/Complaint/Death & Serious Injury X https://delta.dbhds.virginia.gov/ X

https://delta.dbhds.virginia.gov/chris/WebForm2.aspx

1 of 1 100% Find Next

Individual Care Concerns (Case Management Provider) Individual Care Concern Licensing Specialist Action (LSA) Notification

Enter date 09/01/2022 to 09/30/2022 from

Based on current serious incident as well as a review of other recent incidents related to this individual, the Office of Licensing recommends the provider consider the need to re-evaluate the individual's needs as well as review the current individual support plan. Provider may want to review the results of root-cause analyses completed on behalf of this individual. In addition, please take this time to determine the appropriateness of making systemic changes such as revisions to policies or procedures and/or re-evaluating and updating your risk management and/or quality improvement plan. In addition, this information is shared with the Office of Integrated Health and the Office of Human Rights who may follow-up to provide technical assistance as appropriate

Provider Name	Agency Cd	Provider IDText	Service IDText	Program IDText	Service Program	Program Name	Street	City	State	Zip	Death Serious Injury Ctr ID	DOB	Gender	Medicaid Num	Death Incident Date	Discovery Date	Enter Date	LSA	Remarks
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To save the report. Click on the export button (highlighted) and select Excel. Save excel file.

The screenshot shows a web browser window displaying the DBHDS Case Management Care Concern Threshold Report. The browser's address bar shows the URL <https://delta.dbhds.virginia.gov/chris/WebForm2.aspx>. The report interface includes a toolbar with navigation and export options. The export menu is open, showing the following options: Word, Excel (highlighted), PowerPoint, PDF, TIFF file, MHTML (web archive), CSV (comma delimited), XML file with report data, and Data Feed. The report content area displays a table with columns for Provider Name, Agency Cd, Provider IDText, Service IDText, Program IDText, Service Program, City, State, Zip, Death Serious Injury Ctr ID, DOB, Gender, Medicaid Num, Death Incident Date, Discovery Date, Enter Date, LSA, and Remarks. The table is currently empty.



DBHDS Defines
Risk Triggers and
Thresholds as
Care Concerns

**Care Concerns
(Last Revised
1/1/2023)**

12VAC35-520.D

**The systemic risk
assessment shall
incorporate
uniform risk
triggers and
thresholds as
defined by the
department.**

A. Multiple (2 or more) unplanned medical hospital admissions or ER visits for falls, urinary tract infection, aspiration pneumonia, dehydration, or seizures within a ninety (90) day time-frame for any reason.

B. Any incidents of a decubitus ulcer diagnosed by a medical professional, an increase in the severity level of a previously diagnosed decubitus ulcer, or a diagnosis of a bowel obstruction diagnosed by a medical professional.

C. Any choking incident that requires physical aid by another person, such as abdominal thrusts (Heimlich maneuver), back blows, clearing of airway, or CPR.

D. Multiple (2 or more) unplanned psychiatric admissions within a ninety (90) day time-frame for any reason.

Providers need to track, on an ongoing basis, their organization's serious incidents and care concerns. Serious incidents are defined by regulation, 12VAC35-105-20.

Definitions: Virginia Administrative Code - Title 12. Health - Agency 35. Department of Behavioral Health And Developmental Services - Chapter 105. Rules and Regulations for Licensing Providers by the Department of Behavioral Health and Developmental Services

- To identify trends.
- To support or identify the need for Root Cause Analysis.
- To promote discussions about how to better protect individuals' health and safety.

Sample Serious Incident and Care Concern (CC) Tracking Chart

Cause / Type of Serious Incident	January	February	March	TOTAL
Falls	3	1	2	6
UTIs	2	2	2	6
Aspiration pneumonia	0	1	1	2
Dehydration	1	0	0	1
Seizures	3	1	1	4
Etc.	0	1	0	1
Care Concern (CC): 2 or more unplanned medical hospital admissions or ER visits for falls, urinary tract infection, aspiration pneumonia, dehydration, or seizures within a 90-day time-frame for any reason	2	1	0	3
CC: Decubitus ulcer (DU)– any dx, increase in severity of diagnosed DU, Dx of bowel obstruction	0	1	0	1
CC: Any Choking incident	2	0	1	3
CC: 2 or more unplanned psychiatric admissions within a 90 day time-frame for any reason	3	2	4	9



Providers should develop a root cause analysis policy that identifies additional risk triggers and thresholds for when a more detailed root cause analysis should be conducted.



This is outlined in
licensing regulation
160.E.2.



The systemic risk assessment process shall incorporate uniform risk triggers and thresholds as defined by the department.



This is outlined in
licensing regulation
520.D.

When entering an incident and creating a new profile for an individual, please perform a **Name** search first to ensure a profile does not already exist for the individual. To search by individual name:

- Click the **by Name** button
- Enter the individual's **First Name** and **Last Name**
- Click **Search**
- All individuals with a name “similar to” the one you’ve entered will be displayed on the screen.
- Click the highlighted ID number link to choose the individual you need.

CHRIS VERSION 5.1

Select a Record by Clicking
By Name-You must enter the individual's first and last names
(This search will display all records that 'sound like' the name you entered.)
By Abuse Case - you must enter the abuse allegation case number
By Complaint Case - you must enter the complaint case number

Agency CD:016 , User Role: 24

☒ by Name ☐ by Abuse Case ☐ by Complaint Case ☐ by Death/Incident Case

Case Number

Name (First, Last)

Choose from the individuals below or click [here](#) to add new individual.

ID	First	MI	Last	SSN	Gen.	DOB	City	Zip
01620197811179	John	D	Doe	124124124	M	1/1/1950	Alexandria	22314
0162019619142257	Jane	S	Doe	555241234	F	1/1/1980	Alexandria	22314



- An analysis of Provider's use of the "Other" categories found:
 - The existing Cause checkboxes were being underutilized, potentially resulting in skewed data and misunderstanding of causes.
 - Make sure you select the most appropriate cause(s).
 - Many SIRs categorized as Injury, Other are either not injuries or could likely be better categorized as illnesses.
 - Make sure you use the 'Injury' options correctly.
 - For most Illnesses currently categorized as 'illness, other', there are not alternative checkboxes that apply. Thus, most illnesses are correctly categorized as 'other'.
 - Keep up the great work, appropriately categorizing 'other' illnesses!





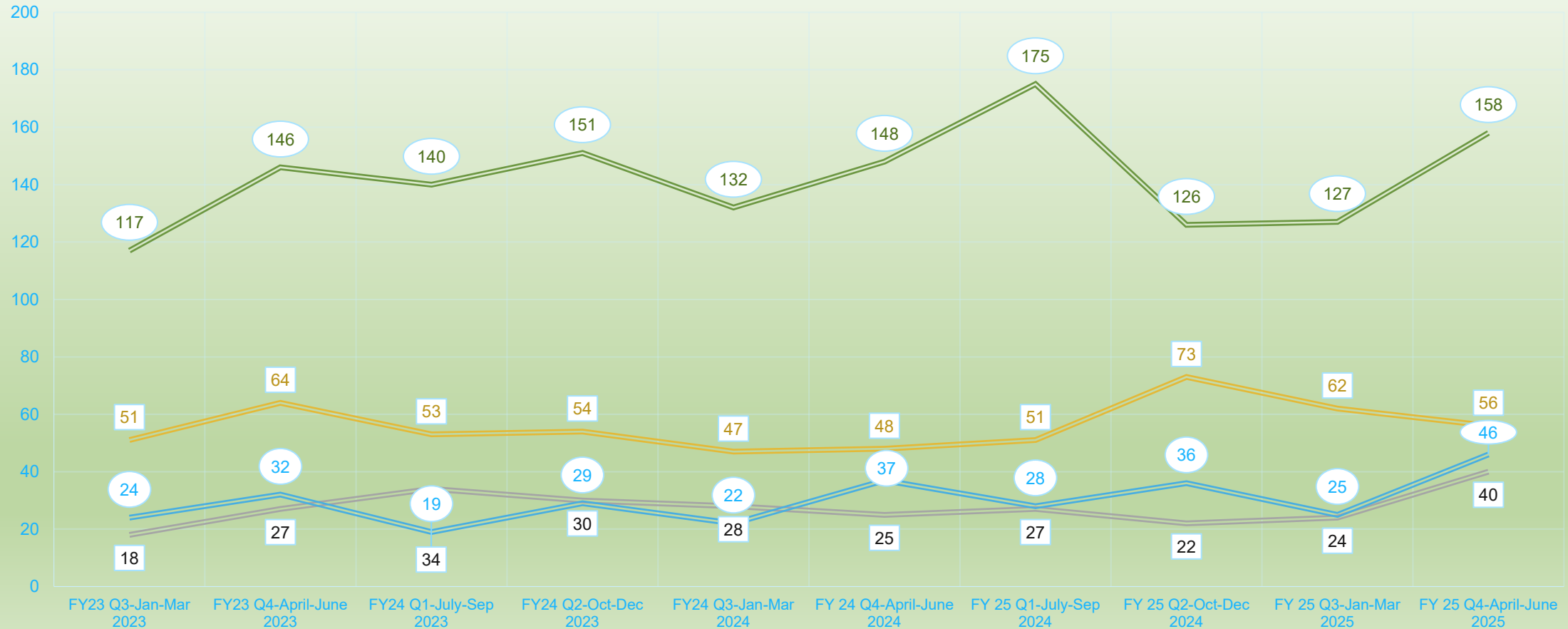
Based on the serious incident as well as a review of other recent incidents related to this individual, the Office of Licensing recommends the provider consider the need to re-evaluate the individual's needs as well as review the current individual support plan. Provider may want to review the results of root-cause analyses completed on behalf of this individual. In addition, please take this time to determine the appropriateness of making systemic changes such as revisions to policies or procedures and/or re-evaluating and updating your risk management and/or quality improvement plan. In addition, this information is shared with the Office of Integrated Health and the Office of Human Rights who may follow-up to provide technical assistance as appropriate.



- The Office of Licensing does not complete an inspection or issue a licensing report because of an individual care concern threshold is met.
- The LS can decide that an investigation of the Death or Serious Incident (DSI) will be conducted based on review of an individual care concern threshold, but the same is true for any DSI.
- Provider must follow regulatory requirements in relation to risk triggers and thresholds.

BY FY QUARTER

Care Concern A Care Concern B Care Concern C Care Concern D





Risk Triggers and Thresholds resources available on the Office of Licensing website:

- [2023 Care Concern Threshold Criteria Memo \(February 2023\)](#)
- [Risk Triggers and Threshold Handout \(February 2023\)](#)



- <https://dbhds.virginia.gov/quality-management/Office-of-Licensing/>
- OIH Health & Safety Alerts, Newsletters, Community Nursing Meeting Agendas, Information on MRE, Dental, and Community Nursing are located on the DBHDS website under the Office of Integrated Health @ <https://dbhds.virginia.gov/office-of-integrated-health/>. There are additional resources related to common medical concerns for the ID/DD population including Health Risk PPTs under the Educational Resources tab under this same link.



Available on the Office of Licensing Web Page

Regulations

[Rules and Regulations For Licensing Providers by the Department of Behavioral Health and Developmental Services \[12 VAC 35 - 105\]](#)

[Regulations for Children's Residential Facilities 12VAC35-46](#)



Guidance

[LIC 17: Guidance for Serious Incident Reporting \(November 2020\)](#) This document contains guidance to providers regarding the definition of “serious incident” and the corresponding reporting requirements as provided in the Rules and Regulations for Licensing Providers by the Department of Behavioral Health and Developmental Services, 12VAC35-105.

[LIC 19: Corrective Action Plans \(CAPs\) \(August 2020\)](#) This document provides guidance to DBHDS licensed providers on how to develop and implement an acceptable correction action plan (CAP).

[LIC 20: Guidance on Incident Reporting Requirements \(August 2020\)](#) has been published and is available to offer additional guidance of late reporting requirements and expectations for reporting serious incidents to the DBHDS Office of Licensing, pursuant to 12VAC35-46-1070.C. and 12VAC35-105-160.D.2., including the timeframe for reporting incidents and the progressive citation process.

**Office of Licensing
Incident Management Unit Information**

Incident Management Unit Regional Contacts

Email us @
Incident_management@dbhds.virginia.gov

New Provider Training

Office of Licensing Incident Management 101
Training (April 2025)



Please provide feedback on this power point by completing a Survey.

Here is the link: <https://forms.office.com/g/bRrNwZuyDA>