

	STARBRIDGE POLICIES & PROCEDURES MANUAL
SECTION:	Incident Management Training (Incident Management)
SITE(S) / PROGRAM(S):	All Sites/Programs Certified or Funded by OPWDD
President/CEO Approval:	Date Approved: 05/27/2026
Board of Directors Approval: (Meeting Minutes)	Date Approved: 05/27/2026
Date(s) Reviewed and/or Revised: 05/22/2024, 05/15/2025, 05/27/2026	

Starbridge continually strives to educate individuals receiving services, legal guardians, family members, correspondents, advocates, board members, employees, interns, volunteers, and consultants who have regular and direct contact working with individuals supported. Education in Incident Management increases knowledge and furthers Starbridge's mission to provide quality services that promote positive relationships to the individuals we support and to ensure that all supported individuals are free from abuse and neglect. Training will include that affected individuals of Starbridge will not take any retaliatory action against an employee or affected individual who believes that he or she has reasonable cause to suspect that a person receiving services has been subjected to a Reportable Incident or Notable Occurrence, and the employee or affected individual makes a report to the Vulnerable Persons Central Register (VPCR) and/or the Office for People with Developmental Disabilities (OPWDD) and/or Starbridge and/or if the employee or affected individual cooperates with the investigation of a report made to the VPCR, OPWDD or Starbridge.

Incident Management training will be specific to a person's affiliation with Starbridge: Upon intake/admission to a Starbridge program, Starbridge's incident reporting policies and procedures shall be known to all Supported Individuals in a residence and/or services authorized or funded through contract by the Office of People with Developmental Disabilities (OPWDD) as well as their legal guardian, parent, family member, correspondent, or advocate. Starbridge shall offer to make available written information developed by OPWDD in collaboration with the Justice Center, a copy of Starbridge's Incident Management policies and procedures and a copy of OPWDD's Part 624 regulations. This notification/information will be available on starbridgeinc.org or upon written request to receive paper copies. If identified as being capable of benefiting, individuals supported shall be provided training in techniques and procedures to protect themselves from abuse and other events and circumstances that constitute reportable incidents.

Upon employment or initial affiliation with Starbridge and annually thereafter, Starbridge shall make the incident reporting policies and procedures known to employees, interns, volunteers, and identified contractors.

Employees, interns, and volunteers who have regular and direct contact with individuals receiving services will receive/participate in initial (within 3 months of employment/affiliation with Starbridge) and annual incident training. This training will incorporate promoting positive

relationships with the individuals we serve, what constitutes abuse, abuse prevention, and responsibilities to report and take appropriate action when abuse is suspected; as well as identification and responsibilities associated with Reportable Incidents, Notable Occurrences, and Part 625 events/situations. The Code of Conduct adopted by the Justice Center will also be completed in Incident training. Incident training will provide notice to all employees that all Reportable Incidents and Notable Occurrences, including reports of abuse and neglect, shall be investigated; and if an employee leaves employment prior to the conclusion of a pending investigation, the investigation shall continue until it is completed and (for abuse and neglect incidents) a finding is made of substantiated or unsubstantiated.

New members of the Board of Directors will receive incident management training in board orientation. Orientation will review the board's responsibility in oversight of the incident management process ensuring the effectiveness of the identification, recording, investigation, review, and corrective actions with regard to events or situations involving persons receiving services.

Program Directors/Managers/Coordinators are the designated staff who will be trained in completion of the Incident filing process.

PROCEDURES TO IMPLEMENT INCIDENT REPORTING TRAINING

FOR INDIVIDUALS SUPPORTED, LEGAL GUARDIAN, FAMILY MEMBER OR ADVOCATE:

STAFF RESPONSIBLE

Program Director /
Manager / Coordinator

PROCEDURES

1. Upon intake/admission into programs/services certified, sponsored, or funded by OPWDD, will notify the individual supported that they can review written information developed by OPWDD in collaboration with the Justice Center, a copy of Starbridge's Incident Management policies and procedures, and a copy of OPWDD's Part 624 regulations on starbridgeinc.org. The individual will also be informed that paper copies can be received upon request.
2. If the individual supported has a legal guardian, the legal guardian will be notified that they can review written information developed by OPWDD in collaboration with the Justice Center, a copy of Starbridge's Incident Management policies and procedures, and a copy of OPWDD's Part 624 regulations on starbridgeinc.org. The legal guardian will also be informed that paper copies can be received upon request.
3. If the individual supported is a capable adult, determines if there is a family member, correspondent or advocate who they would also like to receive notification of Incident Management information.
4. Assess if the supported individual is capable of benefiting from training in techniques and procedures to protect themselves from

abuse and other events and circumstances that constitute Reportable Incidents.

5. Completes the Knowledge is Power document with the individual/legal guardian and the acknowledgement form.

6. Incorporates level of incident training in the supported individual's safeguards section of their plan. Training shall be provided to the extent possible consistent with a supported individual's disabilities, age, needs, and circumstances.

Quality Improvement
Director

1. Will ensure updated written information developed by OPWDD in collaboration with the Justice Center, a copy of Starbridge's Incident Management policies and procedures, table of contents, and a copy of OPWDD's Part 624 regulations on starbridgeinc.org.

Quality Improvement
Director

1. Will respond to any requests for paper copies of information developed by OPWDD in collaboration with the Justice Center, a copy of Starbridge's policies and procedures, and copy of OPWDD's Part 624 regulations.

FOR ALL EMPLOYEES, INTERNS, VOLUNTEERS:

STAFF RESPONSIBLE

PROCEDURES

Program Director /
Manager / Coordinator /
HR & Workforce
Development

1. Upon affiliation with Starbridge, informs new employee/intern/volunteer that all of Starbridge's Incident Management Policies and Procedures are located on the Starbridge network shared "N" drive.

Quality Improvement
Director

1. On an annual basis, inform all of Starbridge's Incident Management Policies and Procedures Table of Contents located on the Starbridge network shared "N" drive or Starbridge's Website.

FOR ALL EMPLOYEES, INTERNS, VOLUNTEERS WHO HAVE REGULAR AND DIRECT CONTACT WITH INDIVIDUALS RECEIVING SERVICES:

STAFF RESPONSIBLE

PROCEDURES

HR & Workforce
Development

1. Upon hire, completes the Justice Center Code of Conduct with Mandated Reporters.

All Mandated Reporters

1. Attends Incident Prevention and Reporting within 3 months of hire and annually thereafter.

2. Training will include: review of the Justice Center's Code of Conduct, identification of definitions and reporting responsibilities; all Reportable Incidents and Notable Occurrences shall be

investigated (including reports of abuse/neglect); and if an employee leaves employment prior to the conclusion of a pending investigation, the investigation shall continue until it is completed and (for abuse and neglect incidents) a finding is made of substantiated or unsubstantiated.

NEW BOARD MEMBER ORIENTATION

STAFF RESPONSIBLE

Vice President, Corporate
Compliance /
Quality Improvement
Director

PROCEDURES

1. Completes board member orientation within three (3) months of the board members affiliation with Starbridge.