



# COMMONWEALTH of VIRGINIA

NELSON SMITH  
COMMISSIONER

## DEPARTMENT OF BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES

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### MEMORANDUM

To: Licensed Providers of Developmental Services

From: Dev Nair, Assistant Commissioner, Provider Management

Date: August 27, 2025

RE: Expectations Regarding Risk Management Programs for Providers of Developmental Services

We have previously communicated expectations for all providers to establish risk management systems that are able to identify and track the occurrence of common risks or conditions that occur to individuals and that may contribute to serious injuries, illness, or avoidable death. These requirements are laid out in regulation ([12VAC35-105-520](#)), they were also required in the Settlement Agreement and are now included in the Permanent Injunction.

*Permanent Injunction (PI) Term 42, "Risk Management: To ensure that the risk management programs of DBHDS licensed providers of DD services identify the incidence of common risks and conditions faced by people with DD that contribute to avoidable deaths and take prompt action when such events occur or the risk is otherwise identified, the Commonwealth will take the following actions:*

*b) Within 12 months of the date of this Order, the Commonwealth shall offer technical assistance in accordance with DBHDS's Consultation and Technical Assistance Standard Operating Procedure to each provider that does not identify the incidence of common risks and conditions faced by people with DD that contribute to avoidable deaths."*

It is essential that a provider's risk management program establishes processes to identify the occurrence of risk events so that steps can be taken to implement processes to reduce the harm that may result from these risks.

To facilitate achieving this goal and compliance with this Permanent Injunction Term, DBHDS has identified nine common risks and conditions that are reported by providers through the CHRIS system and monitored by the DBHDS Risk Management Review Committee. Those risks and conditions are:

- Aspiration Pneumonia
- Bowel Obstruction
- Sepsis
- Pressure Injury (Decubitus Ulcer)
- Fall

- Dehydration
- Seizure
- Urinary Tract Infection
- Choking

DBHDS recommends that providers track the occurrence of these events and/or other risks and conditions that are significant for the population they serve. Identifying those risks that are most significant for the individuals that you serve will allow you to identify steps to mitigate the potential harm from these risks and to track future occurrences.

DBHDS has developed tools that may assist providers in identifying, tracking, and addressing these risks. Additionally, DBHDS will be offering interactive training sessions on October 9, 2025, and January 8, 2026, from 10am-11am. Links to the training registration, tools, instructional video, and other resources are located below.

**Attend live training! 10 am – 11 am**

Thursday October 9, 2025: [Click to register](#)

Thursday January 8, 2026: [Click to register](#)

**Direct Links to Tool(s) and Instructional Video**

[Individual Risk Tracking Tool](#)

[Monthly Risk Tracking Tool](#)

[Link to the Instructional Video](#)

**Other Resources**

[Using Data to Drive Quality](#)

[DBHDS Quality Manual](#)

[DBHDS Office of Integrated Health](#)

Thank you for your efforts in implementing this process to ensure the safety and well-being of the individuals served.