

To: All Providers of State and Medicaid Funded Services

From: Khristine Brewington
VP of Network Management, MS, LCMHC, LCAS, CCS, CCJP

Date: July 9, 2020

Subject: Compliance with Alternatives and Restrictive Intervention (Re-certification and Initial Certification) Training Requirements and CPR and First Aid Training Requirements during the COVID-19 Pandemic (JCB#368), Free Webinar: Autism & COVID-19, Important NCSNAP Reminders

COMPLIANCE WITH ALTERNATIVES AND RESTRICTIVE INTERVENTION (RE-CERTIFICATION AND INITIAL CERTIFICATION) TRAINING REQUIREMENTS AND CPR AND FIRST AID TRAINING REQUIREMENTS DURING THE COVID-19 PANDEMIC

The purpose of this bulletin is to provide guidance to providers, instructors, and staff on how to address:

1. The re-certification and initial certification requirements outlined in Rules 10A NCAC 27E. 0107, Training on Alternatives to Restrictive Interventions and 10A NCAC 27E. 0108, Training in Seclusion, Physical Restraint and Isolation Time-Out, and
2. State regulatory Cardiopulmonary Resuscitation (CPR) and first aid training requirements pertaining to mental health, developmental disabilities, and substance use disorder services, during the COVID-19 pandemic.

CERTIFICATION AND TRAINING REQUIREMENTS PERTAINING TO INTERVENTION CURRICULA

The following applies to staff who are currently certified or seeking initial certification in the prevention components of restrictive intervention curricula:

1. Existing certifications currently held by individuals may be extended and deemed valid through September 30, 2020 to allow additional time for renewal of certifications considering the unprecedented circumstances of the COVID-19 public health emergency and to prevent a lapse in certification. Such extensions apply only to individuals who are already certified and whose certification would otherwise be due for renewal before September 30, 2020.
2. Training on the non-physical prevention components of a curriculum can be completed via two-way, real-time interactive audio-video technology.

3. Given the nature of restrictive interventions and the circumstances culminating in their potential use, the physical components of the training in restrictive interventions must continue to be done in-person, face-to-face. While we understand the need for appropriate flexibility in training options, the safety of consumers remains our top priority. As such, the requirement that the physical components of training on restrictive interventions be conducted face-to-face remains in effect and will continue to be enforced. Please note that the timeframe flexibility discussed above is to allow current certifications to be deemed valid through September 30, 2020 to allow additional time to arrange for and complete in-person training for those individuals seeking re-certification.

Our goal is to help safely address potential staffing issues anticipated as a result of the restrictions imposed in response to the COVID-19 pandemic. We anticipate that an extension of current certifications and the modification permitting the use of two-way audio-video technology with non-physical prevention components will help accomplish this goal.

In managing staffing issues, providers are encouraged to exercise their best judgment in handling the physical component of hands-on training consistent with guidance regarding COVID-19 mitigation measures issued by the North Carolina Department of Health and Human Services and the Centers for Disease Control (CDC).

CPR AND FIRST AID TRAINING REQUIREMENTS

Individuals who are certified or provisionally certified in CPR or first aid in compliance with the American Red Cross or the American Heart Association training and certification programs (as applicable) will be deemed to be currently trained and certified for purposes of meeting any State regulatory requirement for current training or certification in CPR or first aid pertaining to mental health, developmental disabilities, and substance abuse services. This includes, without limitation, requirements set forth in 10A NCAC 27D.0101(f); 10A NCAC 26E.0104(e); 10A NCAC 27E.0108(i); and 10A NCAC 27G.0202(h).

We will continue to monitor the impact of the pandemic on clinical and business operations and work through the Secretary of the Department of Health and Human Services and the Commission for Mental Health, Developmental Disabilities and Substance Abuse Services to provide additional guidance as necessary.

If you have any questions, please contact Mary Tripp at 984-236-5274 or mary.tripp@dhhs.nc.gov.

FREE, OPEN WEBINAR FOR PARENTS AND PROFESSIONALS

AUTISM AND COVID-19: TEACHING THE RULES IN THIS NEW NORM

Date: July 23, 2020

Time: 11:30 am-1:00 pm

This free webinar is geared towards families and professionals who are working to support individuals with ASD / IDD in understanding and adhering to health precautions and safety rules

(temperature screenings, wear a facial covering, wait 6 feet apart from others, and wash hands frequently) that they might encounter in community settings, programs, camps and school settings during this pandemic. Guidance and support tips will also address the potential need for covid-19 testing and recommendations based on testing results. The webinar will offer practical, autism-informed strategies and key considerations. Opportunities for Q&A / discussion will be featured as well.

Presenters:

- *Kristy Myers, RN, ALNC*
- *Louise Southern, M.Ed., BCBA, Associate Clinical Director*

[Register here](#)

IMPORTANT NCSNAP REMINDERS

NC SNAP EXAMINER'S GUIDE

- 🌱 [2017 NC Snap Examiner's Guide](#)

All persons served by the State's Developmental Disabilities (DD) System Require an NC SNAP:

- 🌱 Assessments should be completed and submitted upon initial contact with the I/DD service system (Provider)
- 🌱 Assessments should be updated annually and anytime a significant change has occurred in the individual's needs/level of support

NC SNAPs must be submitted via email or fax:

- 🌱 Email: NCsnap@trilliumnc.org
- 🌱 Fax Number: 252-215-6874; 910-353-4954

Ensure NC SNAPs are filled out completely prior to submission:

- 🌱 Assessments missing pertinent information (Consumer ID Number, Type of Assessment, etc.) will be returned to the provider for correction
- 🌱 Individual's Case Number should be the member's Trillium Case/Record Number
- 🌱 Assessments may be completed "by hand" but should be written in clear/legible handwriting (please do not use cursive handwriting)
- 🌱 Members' social security numbers should not be recorded on NC SNAPs

Each page of the NC SNAP must be submitted for initial and annual assessments:

- 🌱 NC SNAP Summary Report & Supplemental Information forms may be sent in isolation for Discharge NC SNAPs only
- 🌱 Incomplete assessments will not be processed, and will be returned to the provider (via email)

Discharge NC SNAPs should be submitted as promptly as possible:

- 🌱 Please do not wait until the member is due for an annual NC SNAP update to submit discharge NC SNAP
- 🌱 If a member has changed providers, the new provider should be listed on the Summary Report & Supplemental Information page of the NC SNAP

NC SNAPs submitted via email must be sent securely:

- 🌱 Members' names/initials should not be listed within the subject line of the email (this is an electronic HIPPA violation)

The date of NC SNAP assessment should reflect the date that assessments are completed:

- 🌱 Assessments listing a future date cannot be entered into the database
- 🌱 Assessments containing a future date will be returned to the provider for correction

Past-due NC SNAP Notifications are sent out weekly:

- 🌱 Please respond to requests for updated NC SNAPs as promptly as possible
- 🌱 A Plan of Correction will be issued for providers that fail to submit assessments after the third request has been sent

Necessary corrections to a member's NC SNAP utilizing the following procedures:

- 🌱 Corrections should be made by the individual who completed the assessment
- 🌱 One single line shall be drawn through the error, making sure the original entry is still legible
- 🌱 The corrected information shall be recorded legibly above or near the original entry
- 🌱 An explanation as to the type of documentation error shall be included whenever the reason for the correction is unclear
- 🌱 Correction fluid or tape shall not be used for the correction of errors

Any questions about this Communication Bulletin may be sent to the following email: NetworkManagement@TrilliumNC.org. These questions will be answered in a Q&A format and published on Trillium's website.