

## Required Provider Qualification (PQ) Training on Common Health Conditions That May Be Associated with Preventable Deaths

### ODP Announcement 22-108 UPDATE

#### AUDIENCE:

- Providers that render any of the following services, or who are in the process of becoming qualified to render any of the following services:
  - Residential Habilitation
  - Life Sharing
  - Supported Living
- Administrative Entities (AEs)

#### PURPOSE:

The purpose of this announcement is to provide **updated** guidance and information **relating to a qualification requirement** that has been added to the Residential Habilitation, Life Sharing, and Supported Living services (“residential services”). **The updated guidance reflects a change from the original accepted training related to this requirement. Changes are highlighted in red throughout the announcement to provide easy identification.**

#### DISCUSSION:

There are several major health concerns seen frequently in individuals with an intellectual disability, developmental disability, or autism which if untreated can progress to serious illness or death. These conditions are commonly referred to as the Fatal Five and include aspiration, **constipation**, dehydration, seizure, and infection/sepsis. These conditions are often preventable or at least able to be managed effectively with attentive care. Deaths associated with these conditions are often preventable.

ODP **added** a new provider qualification to the **Consolidated, Community Living, and Adult Autism Waivers** for residential services. All provider staff who will spend any time alone with a participant during the provision of residential services must complete a “Department approved training on the common health conditions that may be associated with preventable deaths in people with an intellectual or developmental disability.” This applies to provider staff that are direct employees of an agency, contracted employees of an agency, or volunteers.

A list of Department approved trainings to meet this requirement is available at <https://www.myodp.org/mod/page/view.php?id=40125>. This page lists each organization with currently approved training(s). The approved training(s) that must be completed for the organization are listed next to the “details” bullet underneath the organization. To meet the qualification requirement, staff are required to complete approved training(s) through **one organization** listed.

ODP will now allow Fatal Five trainings developed by residential provider agencies to be used if the training has been reviewed and approved by their regional Health Care Quality Unit (HCQU). To ensure content is clear, comprehensive, and adequately covers each condition, the HCQU Registered Nurse (RN) for that specific provider agency will review the training according to the guidelines provided by ODP based on the chart below:

**REVIEW OF TRAINING FOR COMMON HEALTH CONDITIONS THAT MAY BE ASSOCIATED WITH PREVENTABLE DEATHS IN PEOPLE WITH AN INTELLECTUAL OR DEVELOPMENTAL DISABILITY**

Criteria	Aspiration	Constipation	Dehydration	Infection/Sepsis	Seizures
Condition is defined clearly					
Symptoms					
Complications					
Causes and risk factors					
Treatment and prevention					

The HCQU RN will have approximately two weeks to review the submitted training. Upon approval, a certificate containing the name of the training, the date of approval, the name of the provider, and the name of the HCQU nurse who approved it will be sent to the provider.

Providers will have their approved training reviewed every two years to evaluate continued effectiveness in meeting the posted criteria. Please note: If a provider makes *any changes or edits to their approved Fatal Five Training, they should resubmit it to their assigned HCQU for repeat approval **before** it is implemented.*

Providers are reminded that:

- Documentation of training completion must be maintained in accordance with [55 Pa.Code § 6100.141 \(Relating to Training Records\)](#).
- This training may be counted towards the annual training hour requirements specified at [55 Pa.Code § 6100.143 \(Relating to Annual Training\)](#).
  - Although this training is not required to be taken annually, ODP recommends that the content be reviewed periodically to maintain competency in recognizing the conditions.
  - The training courses listed may contain guidance that differs from regulatory requirements for reporting, investigating, and responding to incidents that arise from the common health conditions covered in the course. When this occurs, staff must adhere to regulatory requirements.
  - The training courses listed above may contain guidance that differs from a provider's internal policies for reporting, investigating, and responding to incidents that arise from the common health conditions covered in the

course. When this occurs, staff should adhere to the provider's internal policies.

### **Current Providers**

Providers that are currently qualified to render residential services must ensure that provider staff complete the required training as follows:

- Provider staff hired before **the effective date of the waiver changes** must complete the required training no later than **three months after the effective date of the waiver changes**.
- **Provider staff hired on or after the effective date of the waiver changes must complete the required training before working alone with an individual.** For purposes of this requirement, a provider staff is “working alone” when they are not in the line of sight of other persons who have received Department-approved training on the common health conditions that may be associated with preventable deaths in people with an intellectual disability, developmental disability, or autism. It is the responsibility of the provider to demonstrate the date provider staff worked alone with an individual.
- If a provider staff has already taken one of the Department approved trainings prior to the effective date of the waiver changes, the provider staff does not need to take the training again to meet qualifications.

For current providers, AEs or ODP (for the AAW) will verify that residential services staff received the required training **the next time the provider goes through the requalification process.**

### **New Providers**

Beginning on the effective date of the waiver changes, all newly enrolled residential services providers must ensure that all provider staff complete the required training before they can work alone with individuals.

## QUESTIONS AND COMMENTS

Questions relating to this announcement may be directed to the ODP Provider Qualification Unit at [ra-odpproviderqual@pa.gov](mailto:ra-odpproviderqual@pa.gov) for Consolidated and Community Living Waiver providers. Adult Autism Waiver providers should send questions to [ra-pwbasprovenroll@pa.gov](mailto:ra-pwbasprovenroll@pa.gov).