

**Approval Process for Prevention
and Emergency Safety
Intervention Training Programs
Best Practice Guide**

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Policy 21-22 No child or youth shall be placed by DCF in any facility that permits physical restraint and seclusion unless the staff of the facility have been trained in the use of physical restraint and seclusion using a training curriculum that has been reviewed and approved by DCF.

The Department shall institute a process for the review and approval of prevention and emergency safety intervention training programs utilized by DCF-licensed child caring facilities in order to ensure the physical and psychological safety and personal dignity of children who are clients of those facilities prior to, during and subsequent to the use of emergency safety interventions (*e.g.*, physical restraint or seclusion).

Legal Reference: Conn. Gen. Stat. § 46a-154
<http://www.cga.ct.gov/2011/pub/chap814e.htm>

Review Panel A Review Panel chaired by the Program Manager of the DCF Licensing Unit will be responsible for implementing DCF Policy _____. The Review Panel will view live demonstrations of emergency intervention programs presented by the programs' trainers, assess these programs for compliance with DCF standards, and make recommendations regarding approval of the programs to the DCF Commissioner.

The Review Panel may consist of staff from DCF and other individuals as set out below.

The Review Panel will have a fixed membership with panel members agreeing to serve for a minimum of one year on the panel.

The Review Panel membership should reflect cultural and gender diversity.

The Review Panel will ideally include a minimum of seven and a maximum of eleven members.

The Review Panel will ideally consist of the following members:

- consumer representative(s): one or two representatives (*e.g.*, family member, former client who is an older adolescent or an adult);
- a minimum of three private provider community representatives; and
- a minimum of three DCF representatives including a medical representative (physician or nurse).

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Review Panel To ensure full Review Panel participation in the training program live presentations, each member will be asked to identify a substitute attendee who will be available to participate in the presentations in their absence.
(Continued)

With the exception of the consumer and medical representatives, all Review Panel members must have previous training in a restraint model (this does not need to be current training) and have experience in overseeing restraint activities in a public or private agency.

No more than two panel members from the private provider community and DCF may utilize the same training program (*e.g.*, only two private providers on the panel can be using TCI program in their facilities).

Review Panel members affiliated with a facility that utilizes the training program that is being reviewed may participate on the Review Panel for that training program, but may not make a recommendation for that specific program.

**Review
Criteria**

The DCF Review Panel will utilize specific established criteria to determine whether an emergency intervention training program is recommended for use. The approval criteria are organized into two categories as follows:

(1) required criteria (*e.g.*, safety components such as prohibited procedures); and

(2) preferred criteria (*e.g.*, prevention components such as what de-escalation and debriefing skills are trained).

The approval criteria are listed in the following DCF forms: DCF-3021; DCF-3022; and DCF-3023

The Review Panel will review the each training program to evaluate its compliance with the required and preferred criteria that have been established.

The DCF Restraint and Seclusion Advisory Group will periodically review and revise the required and preferred criteria to ensure they are consistent with state statute, DCF policy and current industry best practices.

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**Training
Program
Application**

To formally initiate the approval review process the training program representative should contact the DCF Licensing Unit. The Program Manager of the DCF Licensing Unit will forward the DCF-3012, "Application for Approval," to the training program representative. The training program representative will complete the application and return it to the Program Manager of the DCF Licensing Unit.

The Program Manager of the DCF Licensing Unit will review the application to ensure that it is complete and acceptable. If additional information is needed, the training program representative will be contacted and asked to provide the additional information. If the training program application is not deemed acceptable under the pre-established criteria (*e.g.*, does not address prevention, poses risk for chest compression) the Program Manager of the DCF Licensing Unit will notify the training program representative and no further steps will be taken for approval. The training program will be informed that it can reapply once it has addressed the concerns raised by the Program Manager.

When an application is reviewed and determined to be complete and acceptable, the Program Manager of the DCF Licensing Unit will schedule a presentation of the training program and will disseminate the application materials to the Review Panel members.

The Program Manager of the DCF Licensing Unit will request a copy of the training program curriculum, when available, prior to the meeting and share copies with the Review Panel.

**Training
Program
Presentation**

The training program representative(s) will present their program in person to the Review Panel. The presentation should include the following:

- philosophical basis of the training program;
- history of the organization and training program;
- training curriculum details including:
 - a. primary prevention techniques;
 - b. secondary prevention techniques including de-escalation techniques;
 - c. debriefing techniques; and
- physical restraint techniques with live demonstration.

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**Panel
Compliance
Review**

The Review Panel will convene in person after the training program presentation in order to review the training program's level of compliance with the established criteria.

Both the submitted training program application and the live training program presentation will be used to review the level of compliance with the established criteria.

If needed, the Review Panel may request additional information from the training program representative in order to review the level of compliance.

The review will identify the training program's level of compliance with both the required and preferred criteria and note any specific criteria with which the program is not in compliance.

For "preferred criteria," the Review Panel will identify with which criteria the training program is or is not in compliance. The Review Panel will determine if any corrective steps may be requested for the training program based on the number and type of preferred criteria with which it is not in compliance.

For the "required criteria," 100% compliance is needed for approval. If there is less than 100% compliance, the training program will be informed that it can submit a detailed written corrective plan of compliance to address the criteria with which it is not in compliance. The corrective plan should include which criteria will be addressed and how, and what will be used as evidence of implementation of the plan.

The Program Manager of the DCF Licensing Unit will notify a training program if it requires a corrective plan. The program will have 30 calendar days from receipt of the notice to submit the corrective plan.

Upon receipt of the corrective plan, the Program Manager of the DCF Licensing Unit will distribute copies of the corrective plan to the Review Panel members and request their feedback in a specified time frame (*e.g.*, five business days).

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Review Panel
(continued)

Based on the feedback received from the Review Panel, the Program Manager of the DCF Licensing Unit will determine if the corrective plan is acceptable or if additional changes are needed and send written notice to the training program stating whether the corrective plan is acceptable or if it needs additional changes. If additional changes are needed, the training program will be given 15 calendar days from the receipt of the notice to submit the revised corrective plan.

The revised corrective plan will again be distributed to the Review Panel members for feedback. The Program Manager of the DCF Licensing Unit will then determine if the revised corrective plan is acceptable. If it is not acceptable, the training program will be notified that the application process is concluded without approval.

If the corrective plan is accepted, the training program will be given up to six months, from the written notification of the acceptance of the plan, to submit documented evidence of the corrective plan's full implementation.

Once received, the documentation of the corrective plan's implementation will be distributed to the full Review Panel by the Program Manager of the DCF Licensing Unit and, as needed, another live program presentation may be scheduled limited to the compliance criteria that were implemented in the corrective plan.

**Panel
Recommendation**

Once the compliance review has been completed, the Review Panel will make a determination on whether to recommend approval of the training program.

The Program Manager of the DCF Licensing Unit will complete a written summary of the Review Panel's recommendation regarding the emergency intervention training program and submit it to the DCF Commissioner or designee.

In cases in which the recommendation is to not approve the training program, the reasons for this recommendation will be included in the summary.

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DCF Decision The DCF Commissioner or designee will review the written recommendation summary provided by the Program Manager of the DCF Licensing Unit. The DCF Commissioner or designee will make the final decision regarding the approval of the emergency intervention training program.

The Program Manager of the DCF Licensing Unit will send written notice of the Commissioner's decision to the training program and the Review Panel members.

If the training program is approved, the notice will also specify that only the training program that was presented to the panel has been approved, and that any and all proposed changes or modifications to the training program must be reported to the Program Manager of the DCF Licensing Unit and approved prior to implementation in DCF-licensed facilities.

If the training program is not approved, the notice will also specify the reasons for non-approval and include notification that the training program may re-apply for approval after six months.

All submitted applications and additional materials for each training program will be kept on file by the Program Manager of the DCF Licensing Unit.

**Modifications
to Approved
Training
Programs**

A training program approval is granted based on the training program that was presented to the Review Panel. All notices of proposed changes to the approved training program must be submitted in writing by the training program to the Program Manager of the DCF Licensing Unit.

In cases in which the change does not involve a modification or addition to the restraint technique(s) used or some other substantial change in the program, the Program Manager of the DCF Licensing Unit may approve the change.

In cases in which the proposed change involves a modification or addition to the restraint technique(s) used, or some other substantial change in the training program, the Program Manager of the DCF Licensing Unit will reconvene the Review Panel to assess the proposed change for a recommendation, following the same procedures as used in an initial review.
