POLICY ADVISORY COMMITTEE
POLICY SUBMITTAL FORM

Section 1: This Section Completed by Originator and Sub-PAC

Title: Rollout plan for implementation of CDHS prone restraint policy

Reference Number 11-CW-005

Date Submitted: 5/2/11

Submitted by (Originator): Joscelyn Gay

Date Reviewed:

Submitted to (Sub-PAC Member):

Date Updated:

Date Approved:

Submitted to (PAC Member):

Problem Statement: **In January 2011, CDHS issued a policy prohibiting restraints in the 'prone' (face down) position in its facilities. This policy extends not only to DHS facilities, but also to its contractors. This change in policy will require contract providers (e.g. residential child care facilities) to change their practice and train staff to comply with the policy.**

Areas of Impact: **Counties, state rule, residential child care providers, other providers, and child care licensing that contract with the counties or the state who apply restraints to persons in their care. The developmental disability providers are already prohibited from using any type of restraint. Counties, in their role as Stage 1 reviewers, will need to interpret the actions of these providers to determine if they have violated the policy. Child care licensing will need to evaluate restraint policies and methodologies for compliance with the policy.**

Goal of the Policy Change: **Applying restraints in a prone position is a high-risk procedure. If applied incorrectly this technique can lead to sudden death. The goal of the policy is to prevent harm to clients from the use of this procedure. The goal of this policy submittal is to allow a reasonable transition period for all agencies that will be affected by this policy to come into compliance.**

Recommendations: **Recommend that the Child Welfare Sub-PAC convene a group of provider, state and county staff to develop an implementation plan for the roll out of the CDHS policy to community providers so that by June 1, 2012 all community providers are in compliance with this policy. This may include identification of nationally recognized models of restraint that do not include prone positioning, rule revisions, development of definitions and technical assistance guides or other. The scope of this submittal does not include solving other compliance issues regarding the care of children in residential settings, nor should it be expanded to include an overall culture change of restraint reduction.**

Statutory Change Needed: ☐ Yes ☐ No **Relevant Statute #**:

Rule Change Needed: ☒ Yes ☐ No **Relevant Regulation #**:

Stakeholders Involved: **Residential child care providers, county stage 1 investigators or others, state child welfare staff, child care licensing staff, experts on restraint techniques for children under age 18 in residential treatment settings.**

Fiscal Impact:

IT System Impact:

Training Needs:

Section 2: PAC REVIEW (Completed by PAC)

Date Reviewed: **6/2/11**

Approved: ☒ Yes ☐ No **Vote Tally**: # of Yes: 10 # of No:

Reason not approved:

Assigned:	☒	*Yes	☐	No

*If decision is to assign to a Sub-PAC go to Section 3 of this form

Section 3: PAC ASSIGNMENT (Completed by PAC)

Date Assigned: **6/2/11**

Sub-PAC Assigned to: **Child Welfare Sub-PAC**

Additional Information to Consider: **Get providers in the workgroup.**

Date of Policy Recommendation Due to PAC: **Update in 3 months. Due in 6 months.**

Section 4: SUB-PAC ASSIGNMENT (completed by Sub-PAC)

Date Assigned:

Task Group Assigned to:

Additional Information to Consider:

Date of Policy Recommendation* Due to Sub-PAC:

* POLICY RECOMMENDATION MUST BE SUBMITTED VIA THE POLICY RECOMMENDATION FORM