

 <p>Children's Services Agency</p> <p>Communication Issuance</p> <p>20-063 Updated 5/28/20. Prior version obsolete.</p>	Subject/Title	COVID-19 Response: Child Caring Institution (CCI) Staffing-Updated
	Type	<input checked="" type="checkbox"/> Informational Memorandum <input checked="" type="checkbox"/> Program Instruction <input type="checkbox"/> Policy Guide
	Issuance Date	5/1/2020
	Obsolete Date	6/12/2020
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	Due Date	N/A
Due to	N/A	
Distribution	<input checked="" type="checkbox"/> CSA Central Office Managers/Staff <input checked="" type="checkbox"/> MDHHS BSC and County Directors <input checked="" type="checkbox"/> MDHHS Juvenile Justice Managers/Staff <input checked="" type="checkbox"/> MDHHS Child Welfare Managers/Staff <input checked="" type="checkbox"/> Native American Tribes <input checked="" type="checkbox"/> Office of Workforce Development and Training <input checked="" type="checkbox"/> Private Agency Child Welfare Managers/Staff <input checked="" type="checkbox"/> Private Residential Abuse/Neglect Managers/Staff <input checked="" type="checkbox"/> Private Residential Juvenile Justice Managers/Staff <input type="checkbox"/> Other:	

This version replaces prior versions of 20-063.

Individuals in congregate care settings may be at risk for infection during an outbreak of COVID-19. This interim guidance is intended to support response planning by child caring institutions (CCI).

Daily Reporting

To forecast where staffing shortages may occur, Michigan Department of Health and Human Services (MDHHS) is requesting that all contracted abuse/neglect and juvenile justice child caring institutions (CCI) submit the following information to wilkinsonk6@michigan.gov by noon each weekday; an updated grid will be e-mailed to all providers:

- Agency Name
- Program Name
- Program Type: Abuse/Neglect or Juvenile Justice
 - Use a separate line for each contract/program type
- Contracted Staffing Ratio
- Youth Census on this Day
- Staffing Ratio on this Day
- Total Number of Direct Care Staff Employed
 - Full and part time staff should be included
- Total number of staff still available to work as direct care staff today
- Total number of staff who are not employed as direct care staff filling in today
- Total number of staff receiving overtime today

- Total number of applicants/new hires in the process
- Rate your level for today using the following colors

	<ul style="list-style-type: none"> • We have enough staff to maintain staffing ratios required by contract and licensing rules.
	<ul style="list-style-type: none"> • We lost some staff, but we can maintain staffing ratios for the program as designated in the contract.
	<ul style="list-style-type: none"> • We lost significant staff, are struggling to cover shifts, but can maintain minimum staffing ratios required by licensing rules.
	<ul style="list-style-type: none"> • We have lost significant staff and within the next 7 days we will not be able to provide staffing to ensure child safety without assistance.

Licensing Rule Modification/Variance Guidance

In response to staffing shortages that are anticipated due to COVID-19, MDHHS has developed the following guidance for licensing rules that can be modified or given a variance. This guidance will allow CCIs to accelerate hiring, quickly repurpose staff within the agency, and quickly onboard and utilize non-agency staff if necessary.

Requirements eligible for a modification are noted below. Where a modification is listed, a variance is not required; all other rule variances must be requested through MDHHS-DCWL-TA@michigan.gov. All modifications are in effect until May 15, 2020 unless otherwise communicated.

	Rule/Requirement
1.	Child caring institution staff member means an individual who is:
a.	18 years or older.
b.	Is employed by a child caring institution for compensation, including adults who do not work directly with children.
c.	Is a contract employee or self-employed individual working with a child caring institution <ul style="list-style-type: none"> • Modification: Individuals who are employed by a child welfare agency will be permitted.
d.	Is an intern or other person who provides specific services under these rules.
2.	Criminal history check
a.	A criminal record check including a fingerprint-based check of national crime information databases, unless an alternative criminal history check has been approved by the federal government.
b.	A check of Michigan’s child abuse and neglect central registry or Canadian provincial agency.
c.	A check of other states’ child abuse registry that the person has lived in within the preceding five years. <ul style="list-style-type: none"> • Modification: The CCI may proceed with their hiring decision once the request to the other state has been made by DCWL. (This is a permanent modification and will not expire with this issuance.)
3.	Supervisor Direct Care Workers: Qualifications A supervisor of direct care workers shall have the education and experience as described in <i>R400.4120</i> . <ul style="list-style-type: none"> • Variance requests for supervisor qualifications must still be sent to DCWL.
4.	Employee records
a.	Name.

b.	A true copy of verification of education from an accredited college or university where minimum education requirements are specified by rule. <ul style="list-style-type: none"> • Modification: Immediate verification will not be required for direct care staff.
c.	Verification of high school diploma or GED when specified by rule. <ul style="list-style-type: none"> • Modification: Immediate verification will not be required for direct care staff.
d.	Work history.
e.	Three dated references which are obtained prior to employment from persons unrelated to the employee and which are less than 12 months old. <ul style="list-style-type: none"> • Modification: A minimum of 1 reference will be accepted; phone reference is permissible.
f.	A record of any convictions other than minor traffic violations from either of the following entities: (i) Directly from the Michigan State Police or the equivalent state law enforcement agency, Canadian province, or other country where the person usually resides or has resided in the previous 5 years. (ii) From an entity accessing either Michigan State Police records or equivalent state, Canadian provincial, or other country law enforcement agency where the person usually resides or has resided in the previous 5 years. Out of state criminal if out of state in last 5 years. <ul style="list-style-type: none"> • Modification: Completed by DCWL, and the CCI may proceed with their hiring decision. If subsequent results are received that indicate prohibitive criminal history when a report is received by DCWL, the facility will be notified, and that individual must be removed.
g.	A statement from the employee regarding any convictions.
h.	Documentation from the Michigan Department of Health and Human Services, the equivalent state or Canadian provincial agency, or equivalent agency in the country where the person usually resides, that the person has not been determined to be a perpetrator of child abuse or child neglect. The documentation shall be completed not more than 30 days prior to the start of employment and every 12 months thereafter. <ul style="list-style-type: none"> • NOTE: Completed by DCWL.
i.	A written evaluation of the employee's performance within 30 days of the completion of the probationary period or within 180 days, whichever is less, and a written evaluation of the employee's performance annually thereafter. <ul style="list-style-type: none"> • Modification: This requirement is waived during this time.
j.	Verification of health where specified by institution policy. <ul style="list-style-type: none"> • Modification: Licensees may choose to waive this requirement.
5.	Tuberculosis screening for employees and volunteers
a.	The licensee shall document, prior to employment, that each employee and volunteer who has contact with residents 4 or more hours per week for more than 2 consecutive weeks is free from communicable tuberculosis. Freedom from communicable tuberculosis shall be verified within the 1-year period before employment and shall be verified every 1 year after the last verification or prior to the expiration of the current verification. <ul style="list-style-type: none"> • Modification: Please refer to guidance in CI 20-062, COVID 19 Response – Child Caring Institution New Hires Tuberculosis Screening.
6.	First aid and CPR
a.	A person certified within the preceding 36 months in first aid and within the preceding 24 months in age-appropriate cardiopulmonary resuscitation by the American Red Cross, the American Heart Association, or an equivalent organization or institution approved by the department shall be on duty at all times when 1 or more children are present.

	<ul style="list-style-type: none"> Modification: Use of online resources to obtain certification is acceptable.
7.	Initial staff orientation
a.	The licensee shall provide an orientation program for new employees. Job shadowing shall not be the only form of orientation. Orientation must include: <ul style="list-style-type: none"> Modification: Alterations to the facility's standard format of the orientation may be made, including use of alternate methods of completion i.e. video conferencing. All topics required under 400.4128(4)(5) must still be covered.
b.	The institution's purpose, policies, and procedures, including discipline, crisis intervention techniques, and emergency and safety procedures.
c.	The role of the staff members as related to service delivery and protection of the children.
d.	The licensee shall provide a written plan of ongoing staff training related to individual job functions and the institution's program.
e.	The licensee shall document that each staff person whose function is covered by these rules has participated in a minimum of 50 clock hours of planned training within the first year of employment and a minimum of 25 clock hours of training annually thereafter related to the employee's job function. At least 16 of the 50 hours provided in the first year shall be orientation provided prior to the assumption of duties. <ul style="list-style-type: none"> Modification: The length of orientation may be less than 16 hours prior to the assumption of duties.
8.	Prison Rape Elimination Act (PREA) for Juvenile Justice Facilities
	<ul style="list-style-type: none"> All PREA new hire requirements must continue to be completed.

Precautionary Steps to Keep Staff Healthy and be Prepared for Staffing Interruptions

The precautions that CCIs have in place to prevent the spread of germs can help protect against COVID-19 and keep residents and staff healthy. Some of the following guidance has been previously communicated, but is critical to promote safety:

- **Wash hands often with soap and water for at least 20 seconds.** Wash hands before eating, after going to the bathroom (or changing diapers), coughing, or sneezing. If unable to wash, use alcohol-based hand sanitizers with at least 60% alcohol.
- **Avoid touching your face,** eyes, nose, and mouth.
- **Cover coughs or sneezes** using a tissue or the inside of your elbow (not your hands). Immediately throw the tissue in the trash.
- **Limit visitors to the facility.** This will reduce the potential for introduction of the virus into the facility.
- **Stay away from people who are sick and stay home when you feel sick.**
- **If staff are handling client belongings, they should use disposable gloves.** Remove gloves without touching the outsides; be sure to wash your hands after glove removal.
- **Minimize the number of staff members who have face-to-face interactions with clients** with respiratory symptoms. Use physical barriers to protect staff who will have interactions with clients with unknown infection status.
- **Cross-train personnel** to perform essential functions so the facility is able to operate even if key staff are absent.
- **Develop a contingency staffing plan** that identifies the minimum staffing needs and prioritizes critical and non-essential services based on residents' health status, functional limitations, disabilities, and essential facility operations.

- **Identify local hotels** where staff could isolate or staff from other agencies could stay if they are coming to assist. Some hotels are offering essential worker rates; it would be helpful to identify and contact for capacity now.