

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HUMAN SERVICES
BUREAU OF HUMAN SERVICES LICENSING
Adult Training Facilities (55 Pa.Code Chapter 2380)

Q/A - Regulatory Clarifications – April 2016

The clarifications and interpretations below will remain on the Department's web site until the information is included in the next updated Regulatory Compliance Guide (RCG).

Regulation: § 2380.111 – Individual Physical Examination

Question: Is it permissible to leave blanks on an individual's physical examination form?

ANSWER: All information required by § 2380.111(c) must be present on the form. Items not required under § 2380.111(c) may be left blank by the medical professional completing the form. If the medical information item is "not applicable (NA)" or there is "none", then the medical professional completing the form must denote that on the form.

Question: If the physical examination form is created by an outside provider agency and it contains items not required under § 2380.111(c), may such items be left blank by the medical professional completing the form?

ANSWER: Items not required under § 2380.111(c) may be left blank by the medical professional completing the form.

Question: If the physical examination form is created by an outside provider agency, is the facility permitted to fill out any portions of the individual physical examination form?

ANSWER: The facility may fill in all information except for medical professional information including the physician's name, signature, medical license #, and the date signed by the physician.

As a reminder, completion of the physical examination form must be based on an in-person physical examination by a medical professional.

Regulation: §§ 2380.111(a), 181(a) – Individual Physical Examination; and Assessment

§ 2380.111(a) - Each individual shall have a physical examination within 12 months prior to admission and annually thereafter.

§ 2380.181(a) - Each individual shall have an initial assessment within 1 year prior to or 60 calendar days after admission to the facility and an updated assessment annually thereafter.

Question: Does BHSL allow any grace periods for completing physical exams or assessments?

ANSWER: Yes. "Annually" means at least once every 12 months. A 15-day flex or grace period is allowed for any item that has a time requirement of one year or more. This includes, but is not limited to:

- Individual physical evaluations (§ 2380.111)
- Documentation of evacuation times and fire-safe areas (§ 2380.89(d))
- Completion of ANNUAL Individual Assessments (§ 2380.181(a))

Unless there is a specific grace period or timeline specified in the applicable section, a 5-day flex or grace period is allowed for any item that has a time line of less than one year. This does **NOT** apply to the following:

- Inspecting fire extinguishers (§ 2380.88(f))
- Conducting fire drills (§ 2380.89(a))

The grace period on timelines does NOT apply to INITIAL documentation or to the following regulations:

- Criminal history record checks (§ 2380.20)
- Fire safety training (§ 2380.91(a))
- Initial individual physical evaluations (§ 2380.111)
- Initial assessments (§ 2380.181(a))
- Initial ISPs (§ 2380.182(d)(1))

Grace periods do not apply to initial documentation requirements for new admissions and new hires.