**Administrative Directive**

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<th>Transmittal:</th>
<th>ADM #2023-04</th>
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| To:         | Developmental Disabilities State Operations Office (DDSOO) Directors  
Developmental Disabilities Regional Office (DDRO) Directors  
Voluntary Provider Agency Executive Directors  
Care Coordination Organization Executive Directors |
| Issuing OPWDD Office: | Division of Statewide Services |
| Date: | June 9, 2023 |
| Subject: | OPWDD Choking Prevention Initiative |
| Suggested Distribution: | Administrative Staff  
Education and Training Staff  
Program and Service Staff  
Quality and Compliance Staff  
Clinical Staff |
| Contact: | nursingandhealthservices@opwdd.ny.gov |
| Attachments: | Choking Prevention Initiative Training available at:  
https://opwdd.ny.gov/providers/choking |

**Related ADMs/INFs**

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<th>ADMs/INFs</th>
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<th>Regulatory Authority</th>
<th>MHL &amp; Other Statutory Authority</th>
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| ADM#2012-04 | 14 NYCRR 633.4; 636-1.2 | MHL §§ 13.07; 13.09; 13.15; 13.17 | 10 years  
New York False Claims Act (State Finance Law §192) |
PURPOSE

This Administrative Directive Memorandum (ADM) sets forth the requirements of the Office for People With Developmental Disabilities (OPWDD) Choking Prevention Initiative (CPI). Choking can occur very rapidly, but potential incidents of choking can be avoided using proper supervision, observation, and training. The Choking Prevention Initiative training ensures uniformity and continuity of training for food and liquid consistency terminology and definitions for all applicable staff statewide. Together we can enhance the health and safety of the individuals served in the OPWDD system, while creating an enjoyable dining experience.

APPLICABILITY

This ADM applies to applicable staff in OPWDD Developmental Disabilities State Operations Offices (DDSOO) and voluntary provider agencies. Agencies must train applicable staff using the training materials specified in this ADM (see: Section II). Agencies may create or provide supplemental training materials and they may be used in addition to OPWDD’s training materials if the terminology is identical to that which has been established by the OPWDD Choking Prevention Initiative.

BACKGROUND

OPWDD previously issued ADM #2012-04 titled OPWDD Choking Prevention Initiative on August 17, 2012. ADM #2012-04 has been cancelled. This ADM #2023-04 replaces it. The CPI training materials and requirements have been updated.

Note: The CPI training materials have been updated for clarity. There are two substantive changes: 1) the addition of liquid consistencies for peanut and nut butters, with no other substantive changes; and 2) the use of date clarifications on documents to reflect:

- Newly Dated-2023 – indicates that the content is the same (e.g., no substantive content changes)
- Revised 2023 – indicates changes to previous content/documents
- Added 2023 – indicates newly added document or training tool.

DISCUSSION

I. CPI Training Overview

   1. CPI Part I: Prevention of Choking and Aspiration Training

       • Consists of an online or hard copy training that all applicable parties (see
section II) must complete.
• Provides an overview of dysphagia as well as increases awareness of the risks of choking and aspiration.
• Can be completed in approximately 30 minutes.

2. CPI Part II: Preparation Guidelines for Food and Liquid Consistency Training

• Consists of an online or hard copy training that all applicable parties (see section II) must complete.
• Provides an overview of the guidelines in its entirety, including each consistency, foods permitted, foods not permitted, CPI video viewing of meal preparation, and hands on training in all food and liquid consistencies.
• Completion time for the CPI Part II Training will vary based on the addition of supplemental materials and the previous knowledge and skills of the participants. Class size and the number of instructors for each presentation will also play a role. Based on these variables, it is estimated that up to 4 hours may be needed for completion of CPI Part II Training.

3. CPI Trainers

The DDSOO, and Voluntary Provider agencies must identify their own trainers for CPI training based on their resources and staffs' knowledge and skills. Trainers may be clinicians or experienced Direct Support Professionals who are recommended and approved by a clinician to become a CPI Trainer because they demonstrate proficiency and knowledge of the OPWDD Choking Prevention Initiative.

4. Transferal of CPI Training

Documented CPI training of a staff person at one agency may be used to satisfy requirements for training of that same staff person at another agency (e.g., if the employee transfers). Providers do not need to accept CPI training of a staff person from a previous agency and may require that staff to complete the CPI training again. If an agency allows a staff's CPI training to be transferred from a previous agency, the agency may still require staff to complete additional training specific to the agencies policies and procedures.

II. Who Must Complete CPI Training

The DDSOO, and Voluntary Provider agencies must provide CPI training to their applicable staff.
1. CPI Part I Training

CPI Part I training must be provided to the following applicable staff:

- Direct Support Staff;
- Clinicians;
- Nurses;
- Physicians;
- Habilitation Staff; and
- Staff who have regular and substantial contact with individuals in any capacity.

2. CPI Part II Training

CPI Part II training must be provided to the following applicable staff:

- Staff who regularly prepare or serve food, assist with dining, or provide supervision of individuals at meals and snack times, except for staff who support individuals with no food or liquid consistency modifications to their diet; and
- Supervisors of such staff.

Note: While not required, it is recommended as a best practice that Care Managers receive CPI Part II Training to enhance their care coordination skills.

III. CPI Part I: Prevention of Choking and Aspiration Training

The CPI Part 1: Prevention of Choking and Aspiration training emphasizes the critical importance of choking prevention for the individuals’ receiving services.

1. Implementation of CPI Part I Training

This training must be implemented as follows:

a. New Applicable Staff Training

   All applicable staff must complete the CPI Part I Training no later than three months from their date of hire.

b. Annual Refresher
Staff who must complete the CPI Part I training must complete an annual refresher training and be retrained more frequently as needed. New applicable staff must complete the annual refresher training within 1 year of the date of their CPI Part I training. Current applicable staff must complete the CPI Refresher training within 6 months of the issuance of this ADM and annually thereafter.

2. Maintaining Documentation of Staff Training

The DDSOO, and Voluntary Providers must ensure that they maintain a record of the staff’s completed training for audit purposes.

- **For OPWDD staff:** When the CPI PART I training is accessed online by any employee of OPWDD, completion of the course will be automatically entered into OPWDD’s Training Database.

- **For Voluntary Providers:** A Certificate of Course Completion is available for printing. The certificate will contain duplicate sections - one should be retained by the course participant and the other is for the agency training record to document completion of the training.

IV. CPI Part II: Preparation Guidelines for Food and Liquid Consistency Training

1. CPI Part II Training

The CPI Part II: Preparation Guidelines for Food and Liquid Consistency training emphasizes the critical importance of the statewide standardization of the terminology and definitions of the seven food consistencies and the four liquid consistencies defined by OPWDD. CPI Part II has three required elements:

- **Element I:** The OPWDD Choking Prevention Initiative Guidelines entitled “Preparation Guidelines for Food and Liquid Consistency” must be reviewed. The guidelines address the terminology, definitions, and preparation of the various food and liquid consistencies.

- **Element II:** Review of the OPWDD training video presentation entitled, “Preparation of Food and Liquid Consistency,” complements the guidelines described in Element I. The video illustrates the recommended preparation of the food and liquid consistencies referenced in the manual
and must be viewed in its entirety.

- **Element III:** Completion of the practical training in preparation of the defined food consistencies and liquid consistencies. This practical training must be provided in-person to reinforce the knowledge and skills learned in Elements I and II. The instructor will demonstrate the difference between each of the food consistencies and the difference between the four liquid consistencies. Staff must prepare the food and liquid consistencies to the satisfaction of the instructor during this element of the training.

2. **Implementation of CPI Part II Training**

   a. **Current Applicable Staff Training**

      Current applicable staff must complete a review of the updated fact sheet to the CPI Part II Training no later than 90 days following the issuance of this ADM. Current applicable staff includes anyone who is currently employed by a DDSOO, or Voluntary Provider who has already completed the CPI Part II training.

   b. **New Applicable Staff Training**

      All new applicable staff (see section II) must receive CPI Part II Training (dated 2023) no later than three (3) months from their date of hire. New applicable staff who require CPI Part II training must complete all three elements of the CPI Part II training, including preparation of the food and liquid consistencies to the satisfaction of the instructor in Element III of the training.

   c. **Annual refresher**

      There is no annual refresher required for CPI Part II Training. However, staff must be retrained using the CPI Part II Training materials when needed, as identified by the agency.

   d. **Documentation of Required Training**

      The DDSOO, or Voluntary Provider Agency must document the completion of the applicable staff’s CPI Part II training and maintain that documentation.
3. Modification of CPI Part II Training for Clinical Staff

CPI Part II Training must not be modified for clinical staff based on their knowledge and skills. Appropriate clinical staff (e.g., speech language pathologists, occupational therapists, dietitians, nurses) must be fully familiarized with the CPI standardized food and liquid consistency terminology and definitions so they can provide clinical guidance to staff and individuals in the OPWDD system.

V. Training Materials and Other Relevant Materials

The revised OPWDD Choking Prevention Initiative training materials and other relevant information is available on the OPWDD Internet website (available at: https://opwdd.ny.gov/providers/choking). This includes:

- **CPI Part I Training: Prevention of Choking and Aspiration (Newly Dated 2023)**
  - Available for online training in the Statewide Learning Management System (SLMS).
  - Available as a PDF for printing if training is not done online.

- **CPI Part II Training Manual: Preparation Guidelines for Food and Liquid Consistency (Revised 2023)**
  - Available as a PDF.
  - Most recent training is dated 2023.
  - A copy of the guidelines must be printed and placed in each certified residential and day program site. To maintain a home-like environment, these guidelines should be stored out-of-view of the individuals but somewhere easily accessible by staff for reference (e.g., in a kitchen cabinet).

- **CPI Part II Training Video: Preparation of Food and Liquid Consistency (Newly Dated 2023)**
  - The video was created in segments to allow for the separate viewing of each defined consistency.

- **CPI 2023 Summary of Revisions Fact Sheet (Added 2023)**
  - Updated training revision information provided in summary format

- **CPI Annual Refresher Training (Added 2023)**
- Includes common issues that have presented during review of choking incidents to be used as a refresher on an annual basis or as needed by providers.
- The power point is on SLMS

• **OPWDD Food Consistency Crosswalk (Added 2023)**
  - This crosswalk is intended to help guide staff to match the correct diet consistency when an individual has a consistency recommended by a non-agency Speech Language Pathologist (SLP) that does not match the OPWDD Choking Prevention Initiative (CPI) Consistency Guidelines.
  - Available as a PDF

• **Stop Choking Hazards Cutting Board Image and Poster (Both Newly Dated 2023)**
  - OPWDD provided a cutting board and a related poster for each certified site when the original ADM was issued in 2012. These materials have been updated to reflect a current date (2023) but the content has not been changed. Both the cutting board and the poster provide a template and a description for each of the food consistencies defined by OPWDD. (Note: The image of the cutting board is not true to size.)
  - The related poster is available upon request to each agency for distribution to residential and day habilitation sites. The poster can also be printed from the website onto 11x17” paper to maintain the correct food consistencies pictured. To maintain a home-like environment, the poster must be stored out-of-view of the individuals but located somewhere easily accessible by staff for reference (e.g., in a kitchen cabinet).

• **Cutting Board Orders**
  - Information on how to order new cutting boards is located on the OPWDD website.

• **OPWDD Food Consistency Terminology Table (Revised 2023)**
  - May be printed and posted at each agency’s discretion.

• **Food Consistency Terminology Physicians Reference (Revised 2023)**
  - May be printed and distributed to health care providers and used when food and liquid consistencies are being ordered for the individuals we support. It also has a list of suggestions that may need to be ordered by the health care provider, such as positioning, that will ensure a safe and enjoyable dining experience.

• **Contact Information**
- Please contact the nursingandhealthservices@opwdd.ny.gov for questions related to CPI and the CPI training materials.