

PROVIDER ADVISORY #2021-014
VALIDATIONS DURING THE 60-DAY GRACE PERIOD

ACTION REQUIRED

EFFECTIVE DATE: JULY 29, 2021

Governor Ron DeSantis signed Executive Order 20-52 declaring a state of emergency on March 9, 2020. In direct response Director Palmer signed APD's Emergency Order 20-01 on March 23, 2020.

APD's Emergency Order 20-01 permitted a medication administration provider (MAP) to temporarily forgo annual revalidation during the state of emergency. The MAP would have 60 days from the end of the state of emergency to be brought up to date.

Executive Order 20-52 declaring a State of Emergency officially expired on June 26, 2021. The end of the 60-day grace period granted by APD's Emergency Order 20-01 is August 25, 2021.

This means that

- any MAP whose validation lapsed during the State of Emergency must revalidate no later than August 25, 2021 to 'make up' the lapsed revalidation
- any MAP whose established Validation Effective Date falls between June 26th and August 25th has until August 25, 2021 to complete their revalidation for 2021
- any MAP whose validation effective date is within the 60 days following the date they actually bring their validation up to date may use the 'make-up' validation for the 2021 validation as well. The last possible date to be eligible for this is October 24, 2021 for those MAPs who made up their lapsed validations on August 25, 2021

Examples:

- John B's validation effective date is April 20, 2019. He did not revalidate in April of 2020 or April of 2021, during the period of the state of emergency. He must now revalidate no later than August 25, 2021. His validation effective date will remain April 20, 2019 and the validation expiration date will be April 20, 2022.
 - If he does not revalidate by August 25, 2021 his validation will lapse. He would then be required to take the Basic Medication Administration Training course again and be validated. In this situation, his new validation effective date would be based on the date of his initial validation following retraining.
- Maria V's validation effective date is July 5, 2018. She was able to revalidate in the 60 days prior to July 5, 2020, but did not get validated timely by July 5, 2021. She must revalidate no later than August 25, 2021. In effect, she gets some extra time due to the grace period for the emergency order. Her new validation effective date remains July 5, 2018 and validation expiration date will be July 5, 2022.

- Phillipa's validation effective date is September 17, 2019. She did not revalidate in 2020, and must now revalidate by August 25, 2021. Phillipa chooses to revalidate on August 5, 2021. She will be able to use this validation for both the validation she missed in 2020, and also for her validation in 2021 – because August 5, 2021 is within 60 days of the anniversary of her validation effective date on Sept. 17, 2021. Her validation effective date will remain September 17, 2019 and the validation expiration date on her new form will be September 17, 2022.

- Lester's validation effective date is October 23, 2019. He was unable to revalidate in 2020, and must now revalidate no later than August 25, 2021. Lester's employer has a Validation Trainer come to revalidate staff on August 20, 2021.
 - Lester's validation effective date remains October 23, 2019 and the new validation expiration date for the validation done on August 20, 2021 is October 23, 2021. He will have to take the MAP Annual Update and then revalidate again within the 60 days preceding this date.
 - this is because October 23, 2021 is more than 60 days after the date of the 'make-up' revalidation on August 20, 2021.

- Lucy's validation effective date is January 20, 2020. She was unable to revalidate by this date in January of 2021, and must now revalidate no later than 8/25/21. Her validation effective date remains January 20, 2020 and her new validation expiration date will be January 20, 2022.

Remember – THE EFFECTIVE DATE DOES NOT CHANGE – so the expiration date with these late validations is the next time the anniversary of that date comes around, with the minor exceptions noted above and illustrated in one the of the examples. In most cases, this will mean that the MAP will have to revalidate in less than 12 months.