

Guidance for 24-Hour Annual Training Requirements in Training Years 2021 and 2022

ODP Announcement 21-060

AUDIENCE:

- Office of Developmental Programs (ODP) Providers
- Supports Coordination Organizations (SCOs)
- Administrative Entity Quality Assessment and Improvement Teams (“AE QA&I Teams”)

PURPOSE:

The purpose of this announcement is to provide guidance for compliance with annual training requirements specified in ODP’s regulations for training years that end in 2021 and 2022.

DISCUSSION:

ODP’s regulations require that select staff shall complete 24 hours of training related to job skills and knowledge each year¹, and that the annual training content must encompass six areas².

Providers that are recovering from the effects of the COVID-19 pandemic or who are struggling with an insufficient workforce may experience difficulty meeting the 24-hour training requirements.

¹ 55 Pa.Code § 2380.39(a), § 2390.49(a), § 6100.143(a), § 6400.52(a), and § 6500.48(a)

² 55 Pa.Code § 2380.39(c)(1)-(6), § 2390.49(c)(1)-(6), § 6100.143(c)(1)-(6), § 6400.52(c)(1)-(6), and § 6500.48(b)(1)-(6)

Please be advised that ODP does not intend to suspend any regulation that requires completion of 24 hours of training related to job skills and knowledge each year, and does not intend to suspend any regulation that requires the provision of training that encompasses the six areas required by regulation. Providers must comply with these requirements.

However, in recognition of the potential difficulties that may be experienced in meeting the 24-hour training requirements, the following guidance will be applied for training years that end in calendar years 2021 or 2022:

- Any training provided that is specific to the COVID-19 pandemic may be counted towards the 24-hour training requirements required by regulation. Such training includes, but is not necessarily limited to:
 - Social distancing
 - Personal Protective Equipment Use (donning, doffing, fit testing)
 - Contact tracing and notifications
 - Mask, face covering, or face shield use
 - COVID-19 sanitation
 - COVID-19 signs and symptom reporting procedures
 - COVID-19 infection notification process
 - Characteristics and methods of transmission
 - How COVID-19 is transmitted by pre-symptomatic and asymptomatic individuals
 - Safe and healthy work practices and control measures
 - Supporting individuals to engage in mask wearing, social distancing, etc.
 - COVID-19 vaccine safety, efficacy, and access

- Set up and use of technology in providing remote service delivery or supporting individuals to connect with friends and family
 - Remote monitoring
 - Use of the Supports Coordinator Check-In for Well-Being Tool
 - Engaging in meaningful conversations during check-ins
 - SC Individual Transition Guide
 - Transition Discussion and Resources Video
 - Reviewing Centers for Disease Control (CDC) and state or local guidelines and trends
- Any component of a Department-approved Medication Administration Course.

Training that is specific to the COVID-19 pandemic or is a component of a Department-approved Medication Administration Course may **be in addition to** training in the six content areas required by regulation or may **be a component of these areas**. Regardless of which training method is used, providers must be able to demonstrate to QA&I and Provider Qualification Teams and the Department’s licensing staff that:

- A total of 24 hours of training was provided
- Some portion of the 24 hours encompassed the six required content areas
- Any additional training provided that is counted towards the 24-hour requirement is specific to the COVID-19 pandemic or a Department-approved Medication Administration Course.

Providers and SCOs are also reminded of the following current and permanent guidance related to training compliance:

- Per the preamble to the 6100 regulations, “annual training can be provided on the job as part of the staff person's scheduled work day, through supervisory conferences, staff meetings, or training provided for individuals and staff persons at the same time.” Providers are encouraged to consider all the ways that training was and is provided during the training year when documenting annual training. As a reminder, providers are required by regulation to keep records of orientation and training, including the training source, content, dates, length of training, copies of certificates received and persons attending³.
- Licensed Providers may self-assess regulatory compliance using ODP’s [Inspection Scoresheets or Provider Self-Assessment Forms](#). If a provider identifies areas of noncompliance while completing a self-assessment, provided those noncompliance areas have been corrected, licensing staff will not identify those areas as noncompliant. Violations identified and subsequently corrected through the self-assessment process will not be cited on a Licensing Inspection Summary. If it is identified that one or more staff did not receive the total numbers of annual training during the previous training year, a violation will not be cited on a Licensing Inspection Summary if:
 - There is a plan in place to ensure that all 24 hours are received in the current training year, and
 - There is evidence that the plan is being implemented, i.e., staff are receiving training such that all 24 hours will be provided by the end of the current training year.

³ § 2380.37(a), 2390.40(a), § 6100.141(a), § 6400.50(a), § 6500.49(a)

CONTACT:

Please contact the appropriate ODP Regional Program Office or the Department's Regulatory Administration Unit at RA-PW6100REGADMIN@pa.gov with any questions about this guidance.