

Orientation and Annual Training Regulation Requirements Questions and Answers

Orientation (2380.38, 2390.48, 6100.142, 6400.51, 6500.47)	
<p>1. Is there a minimum number of hours for orientation training?</p>	<p>No, there is not a minimum number of hours required for orientation training. The training must cover all required topics and be sufficient to ensure that people who are required to receive the orientation understand the requirements to perform their job in a manner that reflects this understanding.</p> <p>Completion of the ODP SC Orientation curriculum meets the orientation requirements in §6100.142 for Targeted Support Management and Support Coordinators that render base-funded services or services through the Consolidated, Community Living or Person/Family Directed Supports Waiver.</p> <p>Supports Coordinators that render services to individuals enrolled in the Adult Autism Waiver are required to take the AAW Support Coordinator Orientation. Completion of the AAW SC Orientation meets the orientation requirements in §6100.142. Please see ODP Communication 21-015 for details.</p>
<p>2. I understand there are standardized training modules available on MyODP to meet the requirements of the new orientation requirements for 6100.142. I also understand all new hire staff need to have the orientation completed prior to working alone with an individual and within 30 days after hire or starting to provide a service to an individual.</p> <p>However, what is the expectation for current staff?</p>	<p><u>Consolidated, Community Living and P/FDS Waivers</u> People who are required to receive orientation who were hired prior to February 1, 2020 would be required to comply with training requirements contained in 55 Pa. Code Chapter 51. While there are no specific orientation training requirements, §51.23(b) states “Before providing an HCBS to a participant, a provider shall ensure that its staff have met any additional pre- and in-service training requirements as detailed in a participant’s ISP.” These staff would also be required to meet the annual training requirements in §6100.143.</p> <p>Staff hired on or after February 1, 2020, must complete orientation in compliance with §6100.142.</p> <p><u>Adult Autism Waiver</u> Staff hired on or after February 1, 2020, must complete orientation in compliance with §6100.142.</p>
<p>3. Can ODP develop orientation videos (these would not include agency specific policies and procedures, of course) so that</p>	<p>ODP has developed a suite of free online orientation courses available here that will satisfy all regulatory orientation requirements with the exception of job-related knowledge and skills. Providers and SCOs are responsible</p>

<p>the same message is being presented to all staff, across all providers, consistently?</p>	<p>for developing and providing orientation on the knowledge and skills each staff person needs to perform their job duties. This orientation can be provided on the job as part of the staff person’s scheduled workday.</p> <p>There are no plans at this time to develop materials in video format, but this recommendation will be taken into consideration as trainings are developed or revised in the future.</p> <p>Completion of the ODP SC Orientation curriculum meets the orientation requirements in §6100.142 for Targeted Support Management and Supports Coordinators that render base-funded services or services through the Consolidated, Community Living or Person/Family Directed Supports Waiver</p> <p>Supports Coordinators that render services to individuals enrolled in the Adult Autism Waiver are required to take the AAW Support Coordinator Orientation. Completion of the AAW SC Orientation meets the orientation requirements in §6100.142. Please see ODP Communication 21-015 for details.</p>
<p>4. How long is each orientation webinar on MyODP?</p>	<p>Each orientation webinar available here is listed below with an estimate of the number of hours it takes to complete each course:</p> <p>Individual Rights – Approximately 2 hours</p> <p>Abuse: Detection, Reporting and Prevention of Abuse, Suspected Abuse and Alleged Abuse – Approximately 3 hours</p> <p>Person Centered Practices – Approximately 3 hours</p> <p>Recognizing and Reporting Incidents – Approximately 3 hours</p>
<p>5. I saw that there is no certificate awarded after each orientation webinar is completed. How are we to verify that each orientation webinar was completed?</p>	<p>Certificates are available for Individual Rights and Person-Centered Practices. Both of these topics have multiple webcasts that must be viewed. At the bottom of the page below the webcasts, there is information regarding training confirmation and sometimes a post-test. When there is a post-test, learners must obtain a score of 80% or higher on the post-test to access a Certificate of Achievement. If the learner passes the test, they should</p>

	<p>refresh their screen to see the link and access the certificate.</p> <p>Certificates are not available for most of the webcasts under the following orientation topics:</p> <ul style="list-style-type: none"> • Detection, Reporting and Prevention of Abuse, Suspected Abuse and Alleged Abuse. • Recognizing and Reporting Incidents. <p>Providers will be responsible for ensuring that training records are kept in alignment with regulatory requirements for webcasts on MyODP where certificates are not available. The person completing training can obtain a transcript from MyODP that will show courses taken, including all dates the courses were taken.</p>
<p>6. Did ODP develop a webinar on job-related knowledge and skills?</p>	<p>The provider, including Agency With Choice organizations and/or managing employers, and SCOs are responsible for developing orientation regarding job-related knowledge and skills. Job-related knowledge and skills training must include all knowledge and skills necessary for the health, safety and welfare of the specific individuals served including:</p> <ul style="list-style-type: none"> • Recommendations and orders from a health care professional, which include, but are not limited to, safe eating/feeding procedures, respiratory maintenance and treatments, positioning and transferring procedures, skin integrity protocols, and individual-specific emergency procedures; • Behavior support guidelines and crisis intervention strategies outlined in the individual’s Behavior Support Plan or Crisis Intervention Plan; • The language and means of communication understood by the individual; and • An understanding of age-related factors such as interests, preferred activities, and stamina. <p>Please note that there are additional training criteria required beyond orientation for specific circumstances as outlined in:</p> <ul style="list-style-type: none"> • Staff training on the behavior support component of an individual plan (§2380.156, §2390.176, §6100.346, §6400.196, §6500.166) • Medication administration (§2380.122, §2380.129, §2390.192, §2390.198, §6100.462, §6100.468, §6400.162, §6400.169, §6500.132, §6500.139)

	<ul style="list-style-type: none"> • Support coordination, targeted support management and base-funding support coordination (§6100.802).
<p>7. Regulations indicate that orientation requirements apply to “administrative and fiscal staff persons” among others. Should agencies view this as applying to staff who work at strictly administrative or corporate offices and have no contact whatsoever with individuals receiving services as well as those that may visit, work or meet in service settings?</p>	<p>ODP has developed orientation and annual training decision trees to assist providers and SCOs in understanding when people are required by Chapter 2380, 2390, 6100 and/or 6400 regulations to complete orientation and annual training.</p>
<p>8. If a direct service professional (DSP) works in a group home with other DSPs, would the DSPs be required to complete orientation training since they aren’t working alone with individuals?</p>	<p>Orientation is critical in ensuring that persons required to complete orientation have the knowledge necessary to ensure the health, wellness and rights of the individuals to whom they render services. For purposes of this regulatory requirement, a DSP is “working alone” when they are not in the line of sight of other persons who have received orientation or annual training as applicable per regulatory requirements. This includes temporary or permanent staff from a staffing agency.</p> <p>Example: Two DSPs are working in a group home where three people live. One DSP was hired 5 days ago, the other DSP was hired 26 months ago. One of the DSPs must assist one of the individuals with personal care for 30 minutes in the bathroom of the home. During this time the other DSP is responsible for the provision of Residential Habilitation services to the other two individuals who are in other parts of the home. In this scenario, the DSP hired 5 days ago must have completed orientation and the DSP hired 26 months ago must have completed annual training as applicable per regulatory requirements.</p>
<p>9. The regulations state, “prior to working alone with individuals, and within 30 days after hire or starting to provide a service to an individual, the following shall complete the orientation as described in subsection (b):”</p>	<p>Orientation must always be completed prior to trainees working alone with individuals. In addition, orientation must be completed within 30 calendar days after hire or within 30 calendar days after starting to provide a service to an individual; either is acceptable. To ensure that trainees remember and implement critical information learned as part of orientation, it is best practice for the</p>

<p>When does the 30 day clock start for completion of orientation? What if the trainee doesn't start providing a service to an individual for months after they are hired?</p>	<p>trainee to complete orientation within 30 calendar days of starting to provide a service to an individual, especially if months will lapse between the trainee's completion of orientation and starting to provide a service to an individual. The latest date that completion of orientation would be considered compliant with regulations is 30 calendar days after starting to provide a service to an individual and the person could not work alone with individuals until orientation is completed.</p>
<p>10. Do members of a life sharing family, other than the life sharer who is employed or contracted through the Life Sharing agency, who are 18 years of age or older need to complete orientation training if the individual receiving life sharing services is home alone with the family member? Does this meet the standard of working alone with an individual?</p>	<p>Yes, members of the life sharing family who are 18 years of age or older are considered volunteers and are subject to orientation requirements if they will work alone with the individual.</p>

Annual Training (2380.39, 2390.49, 6100.143, 6400.52, 6500.48)	
<p>11. Each annual training topic area (community integration, individual choice, etc.) on MyODP lists multiple courses. Do staff, consultants and contractors need to take <u>all</u> courses in each category for them to be considered trained in that topic area?</p>	<p>Providers and SCOs must ensure that everyone required by regulation take annual training that covers each topic area:</p> <ul style="list-style-type: none"> • The application of person-centered practices, community integration, individual choice and assisting individuals to develop and maintain relationships. • The prevention, detection and reporting of abuse, suspected abuse and alleged abuse in accordance with the Older Adults Protective Services Act (35 P.S. § § 10225.101—10225.5102), the Child Protective Services Law (23 Pa.C.S. § § 6301—6386), the Adult Protective Services Act (35 P.S. § § 10210.101—10210.704) and applicable protective services regulations. • Individual rights. • Recognizing and reporting incidents. • The safe and appropriate use of behavior supports if the person works directly with an individual. • Implementation of the individual plan if the person provides an HCBS or base-funding service.

	<p>People who are required by regulation to complete annual training are not required to complete each course under a topic area on MyODP to be considered trained in that topic area. For example, there are multiple trainings under the category of “person-centered practices.” A person does not have to take all these trainings to be considered trained in person-centered practices.</p> <p>Providers and SCOs can choose courses in each topic area that are meaningful to trainees and that enable them to implement the topic area while performing their job functions.</p>
<p>12. The annual training courses on MyODP exceed 24 hours. Do staff, consultants and contractors have to take all the courses on MyODP to fulfill annual training requirements?</p>	<p>People who are required to complete annual training do not need to take all the annual training courses on MyODP to fulfill annual training requirements. Providers and SCOs are responsible for ensuring that people who are required to complete annual training</p> <ul style="list-style-type: none"> • Receive training in each topic area required by regulation; and • Receive the required number of annual training hours stipulated in regulation. <p>Providers and SCOs can choose courses on MyODP in each topic area that are meaningful to trainees and that enable them to implement the topic area while performing their job functions. Providers and SCOs can also choose to develop their own training or utilize training from other sources (professional associations, College of Direct Supports, etc.) to fulfill annual training requirements. Trainings developed or utilized by providers and SCOs that are not on MyODP do not need to be vetted by ODP prior to utilization. These trainings may be reviewed during licensing inspections, qualifications, the Quality Assessment and Improvement (QA&I) process, or other reviews to ensure that they meet regulatory requirements.</p>
<p>13. Can providers use the orientation courses on MyODP to fulfill the annual training requirements?</p>	<p>While the orientation sessions can be used to meet annual training requirements, ODP recommends that providers review the Annual Training Catalogue as it has a larger variety of trainings to choose from, is updated on an ongoing basis, and generate certificates of completion that reflect the latest date the course was completed. Ultimately, providers will want to find trainings that are meaningful to trainees and that enable them to implement the training areas required while performing their job functions.</p>

	<p>If providers choose to continue to use orientation sessions on MyODP to meet annual training requirements, they will be unable to obtain certificates of completion for each person with the latest date of completion of the training. The original date that the orientation session was completed will remain on the certificate. Providers will be responsible for ensuring that training records are kept in alignment with regulatory requirements. The person completing training can obtain a transcript from MyODP that will show courses taken, including all dates the courses were taken. If one course is taken multiple times by a person, the transcript will show all dates that course was taken.</p>
<p>14. When provider staff attend an Individual Support Plan meeting, does this meet the requirements of annual training on <i>“implementation of the individual plan if the person provides an HCBS or base-funding service.”</i></p>	<p>For Supports Coordinators and Targeted Support Managers, facilitation of the Individual Support Plan meeting complies with the requirement for annual training on <i>“implementation of the individual plan if the person provides an HCBS or base-funding service.”</i></p> <p>For all other persons required to complete annual training, participating in an Individual Support Plan meeting does not meet this annual training requirement. To ensure that the Individual Support Plan is implemented by the provider per §6100.224, persons responsible for service provision should receive training on their role in implementing the Individual Support Plan, including training on the provider’s implementation plan per 6100.221(g), if applicable. Training must include all knowledge and skills necessary for the health, safety and welfare of the specific individuals served including:</p> <ul style="list-style-type: none"> • Recommendations and orders from a health care professional, which include, but are not limited to, safe eating/feeding procedures, respiratory maintenance and treatments, positioning and transferring procedures, skin integrity protocols, and individual-specific emergency procedures; • Behavior support guidelines and crisis intervention strategies outlined in the individual’s Behavior Support Plan or Crisis Intervention Plan; • The language and means of communication understood by the individual; and • An understanding of age-related factors such as interests, preferred activities, and stamina.

	<p>Please note that there are additional training criteria required beyond orientation for specific circumstances as outlined in:</p> <ul style="list-style-type: none"> • Staff training on the behavior support component of an individual plan (§2380.156, §2390.176, §6100.346, §6400.196, §6500.166) • Medication administration (§2380.122, §2380.129, §2390.192, §2390.198, §6100.462, §6100.468, §6400.162, §6400.169, §6500.132, §6500.139) • Support coordination, targeted support management and base-funding support coordination (§6100.802).
<p>15. Section 6100.143(c)(5) requires training on <i>“the safe and appropriate use of behavior supports if the person works directly with an individual.”</i> What should training in this area cover for Supports Coordinators and Targeted Support Managers? Is this required for staff if an individual does not receive behavior supports?</p>	<p>For Supports Coordinators and Targeted Support Managers, training modules under “Safe Use of Behavior Supports” located on MyODP should be utilized to meet this training requirement.</p> <p>All persons who implement or manage a Behavior Support Plan must be trained on the positive strategies and/or crisis intervention strategies outlined in the plan. Supports Coordinators and Targeted Support Managers are excluded from this training requirement as they do not directly implement or manage behavioral support plans. For all DSPs who render services to individuals who do not have a Behavior Support Plan, basic competency relating to the appropriate use of behavior supports by DSPs is critical to protect the health and safety of the individuals with an intellectual disability or autism across all service types, provider types and service delivery.</p> <p>Additionally, in accordance with §6100.346 when a restrictive procedure may be used for an individual, the following is required which would meet the training requirements for §6100.143(c)(5):</p> <ul style="list-style-type: none"> • A staff person who implements or manages a behavior support component of an individual plan shall be trained in the use of the specific techniques or procedures that are used. • If a physical restraint will be used, the staff person who implements or manages the behavior support component of the individual plan shall have experienced the use of the physical restraint directly on the staff person. • Documentation of the training provided, including the staff persons trained, dates of training, description of training and training source, shall be kept.

6100.802 Support coordination, targeted support management and base-funding support coordination

16. Supports Coordinators (waiver and base funded), Targeted Support Managers, and Supports Coordinator supervisors are required to complete additional training within the first year of employment per §6100.802. Has ODP developed training for the topic Human Development Across the Life Span? Do any of the trainings available through the College of Direct Supports meet the expectations for training on this topic?

At this time, Human Development over the Lifespan is not an offered training course by ODP. The courses available through the College of Direct Supports do not meet the requirements for training on Human Development over the Lifespan. It is the responsibility of the Supports Coordination Organization to ensure that Supports Coordinators (waiver and base funded), Targeted Support Managers and Supports Coordinator supervisors are trained in this area either by developing the training material or locating a training opportunity for these positions.

Completion of the ODP [SC Orientation](#) curriculum or the [AAW Support Coordinator Orientation](#) meet all other training requirements contained in §6100.802:

- Facilitation of person-centered planning;
- Conflict resolution;
- Family dynamics; and
- Cultural diversity.