



Orientation and Annual Training Regulation Requirements Frequently Asked Questions (FAQ) Version 2.0

| Orientation (2380.38, 2390.48, 6100.142, 6400.51, 6500.47) | |
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| <p>1.</p> <p>Is there a minimum number of hours for orientation training?</p> | <p>No, there is not a minimum number of hours required for provider 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>For Supports Coordinators (SCs):</p> <p>Completion of the ODP SC Orientation curriculum meets the orientation requirements in §6100.142 for Targeted Support Management (TSM) and SCs that render base-funded services or services through the Consolidated, Community Living, Person/Family Directed Support (P/FDS) Waivers and the Adult Autism Waiver (AAW).</p> <p>All SCs hired after 6/30/23 must complete the <i>ODP Supports Coordinator Orientation</i> found in the ODP Supports Coordinator Orientation Hub.</p> |

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| <p>2.</p> <p>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 newly hired 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 are the expectations for current staff?</p> | <p><u>Consolidated, Community Living and P/FDS Waivers</u></p> <p>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 a Home and Community-Based Service (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 Individual Support Plan (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></p> <p>Staff hired on or after February 1, 2020, must complete orientation in compliance with §6100.142.</p> |
| <p>3.</p> <p>Can ODP develop orientation videos (these would not include agency specific policies and procedures, of course) so that the same</p> | <p>ODP has developed a suite of free online orientation courses that will satisfy all regulatory orientation requirements with the exception of job-related knowledge and skills. Providers and SCOs are responsible for developing and providing orientation on the knowledge and skills each staff person needs</p> |

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| <p>message is being presented to all staff, across all providers, consistently?</p> | <p>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 training courses are developed or revised in the future.</p> <p>Completion of the ODP SC Orientation curriculum meets the orientation requirements in §6100.142 for TSM and SCs that render base-funded services or services through the Consolidated, Community Living, P/FDS Waivers, and the AAW.</p> <p>All SCs hired after 6/30/23 must complete the ODP Supports Coordinator Orientation found in the ODP Supports Coordinator Orientation Hub.</p> |
| <p>4.</p> <p>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> <ul style="list-style-type: none"> • Individual Rights – Approximately 2 hours • Person Centered Practices – Approximately 3 hours • Abuse: Detection, Reporting and Prevention of Abuse, Suspected Abuse and Alleged Abuse – Approximately 3 hours |

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| | <ul style="list-style-type: none"> Recognizing and Reporting Incidents – Approximately 1.5 hours <p>ODP recommends taking the entire IM Bulletin series to meet the orientation requirements for recognizing and reporting incidents. However, ODP has organized a streamlined annual IM training page on MyODP that will meet the 6100.142 (b) (2) and (4) Orientation training requirements and can be found at Incident Management Annual Training.</p> |
| <p>5.</p> <p>Does orientation training have to be completed in-person or can direct support professionals (DSPs) complete orientation training on their own, such as watching webinars?</p> | <p>ODP recognizes that people have different learning styles. For this reason, there is no prescribed method for how orientation training must be completed. Orientation training can be completed through any of the following methods:</p> <ul style="list-style-type: none"> In-person, such as at provider administrative locations or on-the-job Live interactive sessions held via remote technology Self-learning where the person watches or listens to a webinar or reads an article. <p>However, as it relates to job-related knowledge and skills, there must be an in-person component where staff are acquiring information necessary for the</p> |

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| | <p>health, safety, and welfare of the specific individuals served. This includes individual specific training on the ISP as well as Behavior Support Plans (BSPs) when applicable.</p> <p>Regardless of the method used, it is best practice for the provider to have a process for checking the person’s understanding of each required topic.</p> |
| <p>6.</p> <p>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. 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 refresh their screen to see the link and access the certificate.</p> <p>Some courses require the completion of the entire training before a certificate is awarded.</p> <p>Providers are responsible for ensuring that training records for individual staff are kept <u>in alignment with regulatory requirements</u> for webcasts on MyODP where certificates are not available. The person completing training can obtain a transcript from</p> |

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| | MyODP that will show courses taken, including all completion dates. |
| <p>7.</p> <p>Did ODP develop a webinar on job-related knowledge and skills?</p> | <p>No, 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 BSP or Crisis Intervention Plan (CIP) • The language and means of communication understood by the individual |

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| | <ul style="list-style-type: none"> • An understanding of age-related factors such as interests, preferred activities, and stamina. <p>Please note that there is 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, TSM, and base-funding support coordination (§6100.802). |
| <p>8.</p> <p>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</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> |

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| <p>individuals receiving services as well as those that may visit, work, or meet in service settings?</p> | |
| <p>9.</p> <p>If a 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> |

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| <p>10.</p> <p>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>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>Orientation must always be completed prior to new staff 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.</p> <p>To ensure that new staff remember and implement critical information learned as part of orientation, it is best practice for the new staff to complete orientation within 30 calendar days of starting to provide a service to an individual, especially if months will lapse between the new staff’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 new staff could not work alone with individuals until orientation is completed.</p> |
| <p>11.</p> <p>If a DSP or SC changes employment from one entity to another (for the same role), do they need to retake the orientation training or can</p> | <p>Orientation training that was, received within 12 months of the original training date, that was developed by ODP or was part of the National Alliance for Direct Support Professionals (NADSP) credentialing process (applicable only for Providers), is acceptable to transfer from one entity to another and would not require reorientation. The only</p> |

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| <p>they apply their orientation from their previous employer?</p> | <p>exception is job-related knowledge and skills portion of orientation. It is expected that all newly hired staff receive training specific to the individual(s) they are supporting.</p> <p>All SCs hired after 6/30/23 must complete the ODP SC Orientation found in the ODP SC Orientation Hub.</p> |
| <p>12.</p> <p>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> |
| <p>13.</p> <p>Can you clarify that employees of the agency who are under other regulatory</p> | <p>Section 6100.2 regarding applicability provides information about which programs, services, and providers the Chapter 6100 regulatory requirements</p> |

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| <p>bodies such as the Office of Mental Health and Substance Abuse Services (OMHSAS) would not be required to take ODP’s orientation trainings on top of their own? Are requirements applicable when providers render services through other offices as well as ODP?</p> | <p>apply to. The requirements in Chapter 6100 currently apply to services funded through the following:</p> <ul style="list-style-type: none"> • Consolidated, Community Living, P/FDS and Adult Autism Waivers. Services funded through the Vendor Fiscal/Employer Agent (VF/EA) Financial Management Services (FMS) model are excluded from Chapter 6100 requirements • Base-funding • TSM state plan <p>Persons who render services funded through ODP as well as other program offices such as OMHSAS would be required to take orientation training as outlined in Chapter 6100. If training required through OMHSAS covers some of the required orientation topics in Chapter 6100, the OMHSAS training would be accepted as complying with those orientation topics in Chapter 6100.</p> <p>Persons who solely render services funded through OMHSAS would not be required to comply with Chapter 6100 requirements.</p> |
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Annual Training (2380.39, 2390.49, 6100.143, 6400.52, 6500.48)

14.

Each annual training topic area (community integration, individual choice, etc.) on MyODP lists multiple courses. Do staff, consultants, and contractors need to take all courses in each category for them to be considered trained in that topic area?

Providers and SCOs must ensure that everyone required by regulation take annual training that covers each topic area:

- 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

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| | <ul style="list-style-type: none"> • 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>15.</p> <p>The annual training courses on MyODP exceed 24 hours. Do staff, consultants, and contractors have need 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 <u>MyODP</u> to fulfill annual training requirements.</p> <p>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. |

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| | <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 Support, 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>16.</p> <p>When a person takes a training that is covered under multiple annual training topic areas on MyODP, can the hours for the training be counted for each topic area? For example, the training titled <i>Acknowledging Self-Determination in Supporting Participants</i> is listed as 1 credit hour and is covered</p> | <p>Training hours are counted as the amount of time it takes the person to complete the training. A training course that shows 1 credit hour, will be counted as 1 hour of training regardless of the number of annual training topic areas covered by the course.</p> |

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| <p>under the annual training topic areas of Person-Centered Practices, Individual Choice, Assisting Individuals, and Individual Rights. Would the training hours for a person taking this course be 1 credit hour or 4 credit hours since the training is covered under 4 annual training topic areas?</p> | |
| <p>17.</p> <p>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 generates 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</p> |

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| | <p>date that the orientation session is 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>18.</p> <p>How can staff meet the requirements of annual training on the “implementation of the ISP”</p> | <p>For SCs and Targeted Support Managers, facilitation of the ISP 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 provider staff required to complete annual training, participating in an ISP meeting does not meet this annual training requirement.</p> <p>To ensure that the ISP is implemented by the provider per §6100.224, persons responsible for service provision must receive training on their role in implementing the participant’s ISP, including training on the provider’s implementation plan per 6100.221(g), if applicable.</p> |

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| | <p>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 BSP or CIP• The language and means of communication understood by the individual• 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) |
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| | <ul style="list-style-type: none"> • 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>19.</p> <p>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 SCs and Targeted Support Managers? Is this required for staff if an individual does not receive behavior supports?</p> | <p>For SCs and Targeted Support Managers, training modules under <i>“Safe Use of Behavior Supports”</i> located on MyODP should be utilized to meet this training requirement.</p> <p>All DSPs who render services to individuals who have a BSP must be trained on the positive strategies and/or crisis intervention strategies outlined in the BSP. SCs and Targeted Support Managers are excluded from this training requirement as they do not directly implement or manage behavioral support plans.</p> <p>For all DSPs who render services to individuals who do not have a BSP, basic competency relating to the appropriate use of behavior supports by DSPs is required to protect the health and safety of the individuals with an intellectual disability (ID) or autism across all service types, provider types, and service delivery.</p> |

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| | <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. |
| <p>20.</p> <p>Do annual training requirements apply to Transportation Trip providers?</p> | <p>Yes, annual training requirements apply to providers that render Transportation Trip services.</p> <p>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> |

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| | <p>However, the annual training hour requirement does not apply.</p> |
| <p>21.</p> <p>What would be considered acceptable documentation for § 6100.143 (c)5-6 for in-person trainings or trainings that are provided onsite, and an electronic certificate is not an option?</p> | <p>The Provider is responsible for ensuring that training records are kept in alignment with regulatory requirements for trainings on MyODP where certificates are not available.</p> <p>Training documentation must include:</p> <ul style="list-style-type: none"> • training source • content • dates • length of training • copies of certificates received • persons attending |
| <p>22.</p> <p>Is there a certain amount of time after a DSP is hired that their annual training year should “start” after hire and/or beginning to render services?</p> | <p>A DSP is eligible to begin their Annual Training upon completion of their Orientation Trainings. Guidance offered in ODPANN 21-034 is still applicable.</p> |

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| <p>23. NEW</p> <p>Can college classes be used to fulfill the required 6100, 24-hour annual training requirement?</p> | <p>College courses taken can count as “job related knowledge and skills” and be used to meet the 24-hour requirement. College classes will count for 1 hour of training per credit hour of the course once it is completed and the student receives a passing grade. Documentation needs to include all components as required by the 6100.141 regulations.</p> |
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| <p>6100.802 Support coordination, targeted support management and base-funding support coordination</p> | |
| <p>1.</p> <p>SCs (waiver and base funded), Targeted Support Managers, and SC 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 training courses available through the College of Direct Support (CDS) meet</p> | <p>Thinking Developmentally Through the Lifespan can be found on MyODP.</p> <p>The courses available through CDS do not meet the requirements for training on Human Development over the Lifespan. It is the responsibility of the SCO to ensure that SCs (waiver and base funded), Targeted Support Managers and SC supervisors are trained in this area either by developing the training material or locating a training opportunity for these positions.</p> <p>Completion of the ODP SC Orientation curriculum meet all other training requirements contained in §6100.802:</p> |

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| <p>the expectations for training on this topic?</p> | <ul style="list-style-type: none">• Facilitation of person-centered planning• Conflict resolution• Family dynamics• Cultural diversity |
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