

Shadowfax

Title	Training Accountability Policy
Policy Number	ORG.1016.000.000
Policy Owner	Policy Committee
Approved By	Compliance Committee 1-28-22
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Associated Policies	RES.6001.000.000 Staff Orientation and Training, DAY.5001.000.000 Staff Orientation and Training
Associated Procedures	
Associated Forms	

I. POLICY STATEMENT

Shadowfax is committed to the safety of our staff and the individuals we serve and to effective, person-centered care for the individuals we serve. As part of that commitment, Shadowfax will properly train staff members according to regulatory, legal, and Shadowfax business requirements.

II. PURPOSE

This policy establishes guidelines to promote the health and safety of the individuals we serve by ensuring all staff members and board members are properly trained to deliver services in a person-centered manner and according to legal, regulatory, and business requirements.

III. SCOPE

This policy applies to all Shadowfax staff members and board members.

IV. GENERAL

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This policy is based on the standards set by PA Code Title 55 Chapter 6100, 6400, 2380, 2390, 52, 6 Pa. Code Chapter 11 (relating to Older Adult Daily Living Centers), statutes and regulations.

V. POLICY

Requirements

All staff members and board members must complete required, applicable training in a timely manner to maintain compliance with laws, regulatory and licensing requirements, and Shadowfax business requirements, and to provide appropriate, direct, person-centered care for individuals. The type and frequency of training may differ based on each staff member's role and level of responsibility.

All Shadowfax departments will create and maintain appropriate additional training policies and procedures to ensure their staff members and board members are trained to the laws, regulatory and licensing requirements, and Shadowfax business requirements applicable to their department.

Accountability Process

Shadowfax will maintain an accountability and compliance process via the Corporation's Learning Management System (LMS). Shadowfax's Training Manager is responsible for the training compliance process and use of the LMS. Shadowfax's Information Technology (IT) department is responsible for maintaining the LMS software, and ensuring it is appropriately available to staff members.

Shadowfax's supervisors are responsible to ensure all staff members and board members receive required training in a timely manner including, but not limited to:

- Setting training requirements and appropriate training deadlines
- Monitoring staff members' and board members' progress toward successful training completion
- Providing support for staff members and board members to complete training
- Meeting with staff members and board members when needed to ensure successful training completion

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Staff members and board members are responsible for registering for and completing required training within set timelines and working with their supervisor and/or the Training Manager to resolve any training-related issues. Staff members are encouraged to sign up for in-person training prior to the last available class before their due dates.

Discipline

Active staff members and board members who do not register for and complete required training on time will receive discipline.

A. Non-Regulatory Required Training:

Staff members and board members who are non-compliant with training will be placed on a 30-day probation period to complete the required training. A staff member may receive additional discipline, up to and including termination of employment, if the staff member makes no reasonable effort to complete required training during the 30-day probation period. A volunteer may receive additional discipline, up to and including termination of their relationship with Shadowfax, if the volunteer makes no reasonable effort to complete required training during the 30-day probation period.

B. Regulatory-Required Training:

Staff members who are non-compliant for training will be placed on a 30-day probation period and will be required to complete the training as soon as possible as specified by their supervisor in the staff member's training plan. Staff members who are non-compliant with regulatory-compliant trainings such as CPR/First Aid and Fire Safety may not be permitted to work, except for completing training, until compliant. A staff member may receive additional discipline, up to and including termination of employment, if the staff member makes no reasonable effort to complete required training as specified by their supervisor in the staff member's training plan.

C. Supervisor Responsibilities:

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Supervisors who do not monitor and/or make reasonable efforts to support their staff members in successfully completing required training will receive discipline. Additional discipline, up to and including termination of employment, may occur for repeated inactivity by supervisors.

VI. OVERSIGHT

Shadowfax's Compliance Committee or their designee(s) (the "Approved By") shall be in charge of the administration of this Policy. The Approved By responsibilities include:

1. Identifying the action steps to come into compliance and directives to maintain compliance and implement the action steps.
2. Periodically reviewing this Policy and monitoring compliance to it.
3. Training responsible parties on their obligations under the Policy.

Revision History

Name	Date	Reason for Changes	Version
NPMS	1/5/22	Overdue regulatory-required training must be completed as soon as possible	2