

Shadowfax

Title	Training Accountability Procedure
Procedure Number	ORG.1016.001.000
Initiating Authority	Training Manager
Approved By	Compliance Committee 1-28-22
Origin Date	September 22, 2021
Revision Date	January 2022
Effective Date	February 1, 2022
Next Review Date	August 2022
Associated Policies	ORG.1016.000.000 Training Accountability, HR.3015.000.000 Corrective Action and Discharge
Associated Procedures	
Associated Documents	ORG.1016.001.001 Training Compliance Plan

I. PROCEDURE 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. Shadowfax expects all staff to complete training successfully and on time.

II. PURPOSE

This procedure establishes the methods Shadowfax will take to ensure staff complete training successfully and on time.

III. SCOPE

This procedure applies to all Shadowfax staff, and to in-person, online, company-wide and program-specific training.

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Note: The term "Individual" is synonymous with resident, client, patient, consumer, or participant.

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IV. GENERAL

Shadowfax's Training Department and supervisors are responsible for implementing this procedure.

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. Every effort should be made to fit training into regular work schedules; if this is not possible, a staff member may use paid overtime hours to complete training with prior approval from their manager.

Shadowfax's supervisors are responsible to ensure all their staff members and board members receive required training within set timelines.

V. PROCEDURE

STAFF REMINDERS OF UPCOMING TRAINING DUE DATES

Recurring training is entered into a training plan in the Relias Learning Management System (LMS) and assigned to applicable staff members. The LMS automatically sends staff members reminders and warning emails. The Relias system sends staff automatic reminders every Saturday that falls within the time from assignment until the due date. Saturday is the default day for all of Shadowfax, which is set by the Relias system. Once the user is down to five (5) days until the due date, the system will send reminders daily.

For non-recurring training, the Training Manager emails staff and supervisors notifying them of the due date and then sends reminder emails at 28, 21, 14 and seven (7) day intervals.

SUPERVISOR REMINDERS OF TRAINING DUE DATES

Every Tuesday (if Tuesday falls on a non-workday, the report will be generated the next workday), the Training Department manually generates the following reports from Relias, and sends them to all supervisors via the email group called Management:

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1. Overdue Staff Training Report
2. Training due in seven (7), 14, 21, or 28 days in the future.

The supervisors use these reports to contact their staff members to remind them to take the specified training prior to the due date, and to help the staff member plan to take the training.

The supervisors use the 14-day prior to due date information to meet with the staff member and create a written plan for how and when the staff member will meet the training requirement, using form ORG.1016.001.001 Training Compliance Plan stored on Shadowfax's secure "G Drive". The form is signed by the staff member, supervisor, and forwarded electronically to the Training Manager to also sign and to file the official copy of the plan. The staff member has responsibility to follow the plan, the supervisor has responsibility to monitor the staff member's completion of the plan, and the Training Manager has responsibility to assist with any issues related to the availability of the training.

The supervisors use the seven-day prior to due date information in two ways:

1. If the training plan created for a staff member at the 14-day mark covered more than seven days, and the staff member is following the plan, the supervisor doesn't need to take any action beyond continuing to monitor the staff member's completion of the plan.
2. If a staff member has not followed the plan created previously at the 14-day mark, the supervisor and staff update the written Training Compliance Plan for how and when the staff member will meet the training requirement. The updated Training Compliance Plan is signed by the staff member, supervisor, and forwarded electronically to the Training Manager to also sign and to file the official copy of the plan. The staff member has responsibility to follow the plan, the supervisor has responsibility to monitor the staff member's completion of the plan, and the Training Manager has responsibility to assist with any issues related to the availability of the training.

CORRECTIVE ACTION AND DISCIPLINE

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If the due date for required training has passed, the Training Manager notifies the supervisor of any staff members delinquent with their training. The Training Manager coordinates a meeting with the supervisor, Training Manager and staff member during which:

1. the staff member is advised of the overdue training
2. the staff member is informed they are on a 30-day probation period during which the staff member must complete the required training or face additional discipline
3. If the staff member is non-compliant with regulatory-required training, including CPR/First Aid and Fire Safety, they are placed on probation and instead of 30 days to complete the training, they must complete it as soon as possible, as specified by their supervisor, or face additional discipline. The staff member may be prohibited from working, except for training, until the required training is complete.
4. The Training Compliance Plan is updated for how the staff member will 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 as specified in the training plan during the 30-day probation period.

A supervisor may receive discipline, up to and including termination of their relationship with Shadowfax, if they make no reasonable effort to ensure their staff members complete required training on time.

VII. OVERSIGHT

The Director for each Shadowfax department or their designate(s) (the "Approved By") shall be in charge of the administration of this Procedure. The Approved By responsibilities include:

1. Identifying the activities necessary to comply with this procedure based on regulatory and program requirements.

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2. Assigning, as appropriate, designees to implement the procedure and associated procedures.
3. Periodically reviewing this procedure and monitoring compliance to it.
4. Training responsible parties on their obligations under the procedure.

Revision History

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