



## LICENSING ALERT

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Deputy Secretary for Quality Assurance

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Division of Drug and Alcohol Program Licensure  
Licensing Alert 01-09

### SATISFACTION OF STAFF TRAINING REQUIREMENTS

28 Pa. Code § 704.11 establishes certain general and specific requirements for initial and ongoing training of staff persons and volunteers. *See* 28 Pa. Code § 704.11(c)-(g). The Department has received various requests for information on whether forms of “independent” training (home study, video or audio-taped training, on-line or other computer based training, and other training in which the individual receives instruction outside of the traditional in-person, interactive process) would be acceptable and could be credited towards the training requirements in 28 Pa. Code § 704.11(c)-(g).

Following a reconsideration of the Department’s policy regarding staff and volunteer training, and various materials regarding the training requirements for other health care professionals, the Department has determined that establishing clock hour equivalency for independent training is possible and that independent training will assist facilities and the Department in ensuring appropriate and efficient services are delivered in drug and alcohol facilities in Pennsylvania. Through a review of existing materials related to training in drug and alcohol treatment and other related health care fields, the Department has established a list of organizations providing independent training which the Department can deem equivalent to the requirements in 28 Pa. Code § 704.11. The organizations which have been deemed by the Department to provide independent training units equivalent to the clock hour requirements in 28 Pa. Code § 704.11 are listed in the attachment to this Alert. Independent training provided by an organization listed in the attachment will be deemed equivalent only as of the date of this Alert or the addition of the organization to the attachment in the quarterly updates discussed below.

In all cases, a facility is required to maintain documentation supporting the successful completion of independent training, for example, training certificates from the approved entities listed in the attachment to this Alert. Documentation will be reviewed during the Department’s surveys of the facility. All training shall otherwise comply with the requirements of 28 Pa. Code § 704.11 and be consistent with an employee’s individual training plan.

The Department will revise and supplement this attachment on a quarterly basis as additional organizations that meet these requirements are identified. Facilities and training

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providers may seek to demonstrate to the Department that organizations not listed in the attachment to this Alert provide independent training equivalent to the clock hour requirements in 28 Pa. Code § 704.11 by providing documentation to the Department to demonstrate that the independent training provided by these other organizations should be deemed equivalent. This documentation should include, at a minimum, the following: information about the organization; the type of training provided by the organization; the names of state boards or agencies that have determined that training by the organization meets the continuing education requirements established by those state boards or agencies for the individuals, and the professions those state boards or agencies regulate. Determinations by the Department regarding independent training equivalency based on submitted requests will be considered and included in the quarterly revisions and supplements to the attachment. Requests for consideration of additional organizations shall be submitted to:

Pennsylvania Department of Health  
Bureau of Community Program Licensure and Certification  
Division of Drug and Alcohol Program Licensure  
132 Kline Plaza, Suite A  
Harrisburg, PA 17104

Once an organization is approved, training provided by the organization will be accepted for compliance with the Department's training requirements as of the date of the quarterly update. Training that occurs prior to the effective date of the update in which the organization has been added to the attachment will not be considered as meeting the training requirements.

Please note, the equivalency of independent training is not considered an exception to the requirements in 28 Pa. Code § 704.11, and instead will be considered compliance with the requirements therein. Accordingly, facilities should not submit requests for exceptions under 28 Pa. Code §§ 701.11-701.13, and exception requests received by the Department related to this Alert will be returned.

Questions regarding this Alert may be directed to the Division of Drug and Alcohol Program Licensure, Telephone 717-783-8675.

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