



LICENSING ALERT

Anna Marie Sossong
Deputy Secretary for Quality Assurance

March 2012

Division of Drug and Alcohol Program Licensure
Licensing Alert 01-12

• UPDATES LICENSING ALERT 01-10 (Attachment) •

SATISFACTION OF STAFF TRAINING REQUIREMENTS

28 Pa. Code § 704.11, Staff development program, requires the project director to develop a comprehensive staff development program for agency personnel. Section 704.11 (g) 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 multiple inquiries as to whether various 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 hours required in 28 Pa. Code § 704.11(c)-(g).

The Department has determined that establishing clock hour equivalency for independent training is possible and that independent training will assist drug and alcohol treatment facilities and the Department in ensuring appropriate and efficient services in Pennsylvania. 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(c)(g). 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

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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 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 an exception to the requirements in 28 Pa. Code § 704.11. Instead, completion of independent training, as described in this licensing alert 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 without Department action.

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

Attachment

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Anna Marie Sossong
Deputy Secretary for Quality Assurance

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Division of Drug and Alcohol Program Licensure
Licensing Alert 01-12
(Updates Licensing Alert 01-10 (Attachment))
ATTACHMENT

SATISFACTION OF STAFF TRAINING REQUIREMENTS
ORGANIZATIONS DEEMED TO PROVIDE INDEPENDENT TRAINING
EQUIVALENT TO CLOCK HOUR REQUIREMENTS OF 28 PA. CODE § 704.11

ORGANIZATION NAME
Addiction Technology Transfer Center (ATTC), including ATTC Regional Centers
Pennsylvania Certification Board (PCB)
Institute for Research, Education, and Training in Addictions (IRETA)
American Nurses Association (ANA) ¹
American Psychological Association (APA) ¹
National Association of Social Workers (NASW) ¹
Approved Continuing Education (ACE) Program developed by the Association of Social Work Boards ¹
Clinical Social Work Association (CSWA) ¹
National Board for Certified Counselors, Inc. (NBCC) ¹
Commission on Rehabilitation Counselors Certification (CRCC) ¹
American Nurses Credentialing Center (ANCC) ¹
Child Welfare League of America ²
National Association of Black Social Workers ²

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American Association for Marriage and Family Therapy (AAMFT) ²
American Family Therapy Association (AFTA) ²
National Council on Family Relations (NCFR) ²
American Association of Sex Educators, Counselors and Therapists (AASECT) ²
American Association of Pastoral Counselors (AAPC) ²
American School Counselors Association (ASCA) ²
American Counseling Association (ACA) ²
American Mental Health Counselors Association (AMHCA) ²
National Rehabilitation Counseling Association (NRCA) ²
American Medical Association (AMA) ²
American Osteopathic Association (AOA) ²
American Psychiatric Association (APA) ²
American Management Association (AMA)*

¹ Independent training offered by the identified organizations' state and local affiliates, and any training providers, courses or workshops approved by the organization or its state or local affiliates is also deemed equivalent.

² Independent training offered by the identified organizations' state and local affiliates is also deemed equivalent.

*Organizations in bold were added since the last revision.

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