

Title X Orientation and Annual Trainings Checklist Webinar on October 14, 2016

Post-Webinar Q&A

A Template Orientation and Training Policy is available on the Women's Health Branch (WHB) Website. While it is not required that you use this specific template, you are required to include information about the Title X Orientation and Training in an agency policy. If you use the template, highlighted areas must be revised to include agency-specific information. Other specific information that must be included in your agency's Title X Orientation and Training Policy is identified throughout this Q&A document.

1. What needs to be completed, when, and by whom?

Within 30 days of Hire for New Staff/By December 31 this year for Existing Staff this year: All Staff Title X Orientation Checklist, Role-specific Title X Orientation Checklist(s), Clinical Staff Title X One-Time Training Checklist [Note: if existing staff (not new hires) have previously completed a role-specific orientation, you may transfer the dates of completion of specific components over to this new form. Please have those staff complete any components of the checklists that were not included in their original orientation. Maintain all old copies of general and role-specific orientation in the employee's personnel folder.)

Within the First Year of Employment & Annually thereafter/Beginning in FY 16-17 or CY 2017 for Existing Staff: Clinical Staff Title X Annual Training Checklist, All Staff Title X Annual Training Checklist, All Staff Title X Annual Confirmation of Understanding Checklist (Note: the content on annual training checklists doesn't have to all be completed all at once, just during the course of the year.)

New Hire Examples:

First 30 days for nurses: Print and complete All Staff Orientation. Nurses print and complete the Nurse Orientation. Nurses with Pharmacy inventory responsibility print and complete 340B Orientation. Nurses print and complete Clinical Staff One-Time Trainings. Over the course of the next 12 months and annually thereafter: nurses print and complete the Clinical Staff Annual Training Checklist, All Staff Annual Training Checklist, All Staff Annual Confirmation of Understanding.

First 30 days for clinical providers: Print and complete All Staff Orientation. Providers print and complete the Provider Orientation. Print and complete 340B Orientation. Providers print and complete Clinical Staff One-Time Trainings. Over the course of the next 12 months and annually thereafter: providers print and complete the Clinical Staff Annual Training Checklist, All Staff Annual Training Checklist, All Staff Annual Confirmation of Understanding.

First 30 days for Registration/Eligibility/Billing Staff: Print and complete All Staff Orientation. Print and complete the Registration/Eligibility/Billing Staff Orientation. Over the course of the next 12 months and annually thereafter: print and complete the All Staff Annual Training Checklist and All Staff Annual Confirmation of Understanding.

- 2. What tabs would Health Educators complete?** The orientation for Health Educators will depend on how they are utilized within your agency. If Health Educators are providing education and counseling to clients within your clinic, they should complete applicable portions of Nursing Orientation and Clinical Staff training checklists. If this is the case, please consult your Women's Health Regional Nurse Consultant for more guidance. If Health Educators' only contact with Title X patients in your area is at Health Fairs and Community Events, they can just complete the "All Staff" orientation and annual trainings checklists.
- 3. What if staff fulfill more than one role within the program? For example, some staff work both the front desk and serve as interpreters.** Title X requires that Family Planning (FP) Program Staff complete a role-specific orientation, so if they wear multiple hats within the clinic, they should complete all tabs/checklists that pertain to their role.

4. **Initially, we had interpreters, check in/check out staff, and FP staff do this training sheet. We also have child health and adult primary care clinics that could possibly see FP patients for other things. Are they required to do this training as well even though they do not work directly in FP for Title X?** If your agency staff are completely separated by clinic, and your child health or adult primary care staff would never, ever cross over and work in the FP clinic with FP patients or provide clinical services such as pregnancy testing/counseling, then they would not need to complete the training. If, however, your staff might fill-in in clinic or might offer some required Title X services, such as Pregnancy Testing/Counseling, then they would also need to complete the orientation/training.
5. **Who can sign off as the “Person Completing Assessment,” the FP Nurse Coordinator or the Supervisor?** Whomever your agency chooses. This should be identified in your agency policy. In addition to the signed checklists, for web-based trainings, we recommend keeping the completion certificates on file. For in-services/trainings during staff meetings, keep sign-in sheets.
6. **If this is kept electronically in the employees file is it OK for the person that is signing off to type in their name or does it require a handwritten signature for completing the assessment?** If your agency policies permit an electronic signature in lieu of a handwritten signature, then that is OK.
7. **What do the numbers in parenthesis after some of the items mean?** Those numbers refer to the sections of the Program Requirements for Title X Funded FP Projects from which that information is drawn.
8. **Where should these completed checklists be kept?** Initial orientation records (i.e. All Staff Orientation, Role-Specific Orientation, and Clinical Staff One-Time Training checklists) must ultimately be included in the employee’s personnel file. Annual training records (Clinical Staff Annual Training, All Staff Annual Training, and All Staff Annual Confirmation of Understanding) may be maintained in a separate folder, file, or notebook. Just assure they are accessible to the WHB staff during monitoring. Refer to #9, below for retention information.
9. **For how many years must we keep these staff orientation and annual training checklists?** Following the Webinar on October 14, the WHB obtained clarification from the North Carolina State Archives Office about record retention for Title X orientation and training records. Standard 5 - Personnel Records, Item 31 – Employee Training and Educational Records on page 40 of the LHD Record Retention Schedule, available at http://archives.ncdcr.gov/Portals/3/PDF/schedules/Local%20Schedules/Local_Health_Departments_20070907t.pdf?ver=2016-03-11-084038-573, directs the agency to “transfer employee-specific records as applicable to PERSONNEL RECORDS (OFFICIAL COPY) item 48, page 43 if such training and testing is required for the position held or could affect career advancement. Destroy remaining records when administrative value ends.” Item 48 states that the official copy of personnel records may be destroyed in office 30 years from date of separation. After consulting with the North Carolina State Archives Office, the WHB has determined that ***initial orientation records [i.e. All Staff Title X Orientation Checklist, Role-specific Checklists(s) and Clinical Staff One-Time Training Checklist] must be filed in the employee’s personnel jacket and retained 30 years from the date of separation. Records of annual training [i.e. Clinical Staff Annual Training Checklist, All Staff Annual Training Checklist, and All Staff Annual Confirmation of Understanding Checklist] must be kept internally for a period of five years***, at which point their administrative value will have ended, then destroyed. The annual training records may be maintained outside an employee’s personnel record, in a separate folder, file, or binder. *The old Title X/FP Yearly Training Sheet should be kept until January 1, 2022, then may be destroyed.*
10. **Our LHD completes an annual training in May each year. Since these are new required documents, can we “back date” some of these activities for this year or do we wait until the next year to complete? Are the checklists due annually on the calendar year or fiscal year with the AAs? (Follow-up question, “Will this training period run from July to June or January to December?)** Each agency can determine on which annual basis, Calendar Year (January to December) or Fiscal Year July to June), they choose to use for the annual documentation. Just include the cycle (CY or FY) in your agency Title X Staff Orientation Policy, and begin the checklists either with the FY 16-17 or with CY 17. If your agency chooses to complete the checklists each FY, you may backdate some training to July 1, 2016, the beginning of the fiscal year. The annual checklists need to be completed on an annual basis, but it is not expected

that all the trainings will occur in the same week or month; these annual checklists may be completed over the course of each year (calendar or fiscal). We recommend having all staff complete the Annual Confirmation of Understanding checklist at the same time each year, since no trainings are required to complete this checklist. Note that this checklist should bear the signature of the staff member to whom it applies, as that individual is attesting, by their signature, that they understand the concept outlined.

- 11. Will this take the place of the old Annual Training Sheet?** Yes. We recommend one person and one back-up be assigned the responsibility for assuring all applicable checklists for each employee are completed and filed in the designated place. *Please note that the orientation and training checklists are a living document and may change. Please attend to the bottom left-hand corner date and assure the updated document is being used. It will be important to use the most current orientation checklists for new hires and the most current annual training/confirmation checklists for existing staff.*
- 12. If I leave my agency and go work for another health dept. what do I take to document past trainings?** Take a copy of your orientation checklists and copies of the last five years' annual trainings and confirmation of understanding checklists.
- 13. Who must complete the 340B Orientation Checklist?** The 340B Orientation Checklist is only for staff who have responsibility for Pharmacy Inventory/ drug ordering, and/or Pharmacy policies/procedures/protocols.
- 14. Is the Apexus Basic 340B Training on the checklist on the WHB Website?** Yes, the link in the 340B Orientation tab/checklist is the same link that appears on the WHB website, Training Page, Women's Health Non-Required Trainings, "Introduction to the 340B Drug Pricing Program by Apexus."
- 15. Under the Clinical Staff One-Time Training Checklist tab, is the third item only applicable for dispensing agencies?** Yes, the third item on the Clinical Staff One-Time Training Checklist is only applicable for dispensing agencies. If your agency does not dispense drugs, mark this "N/A."
- 16. Our LHD has an on-site pharmacy. We have nurses who have completed the dispensing training. This training was entitled dispensing of Drugs by Public Health Nurses and located at <http://publichealth.nc.gov>. Is this equivalent to the Apexus Basic 340 b Training or do our nurses have to complete the Apexus training as well as the previous dispensing training?** The Dispensing of Drugs by Public Health Nurses training is a North Carolina Board of Pharmacy requirement that permits trained Public Health Nurses (RNs) in our state to dispense medications at the Health Department. That is different from the Apexus Basic 340B Training, the 15-minute video linked in the training checklist and on the WHB website. The only staff required to complete the Apexus training are those who have responsibility for 340B inventory.
- 17. In our district the FP nurse coordinator orders the 340B drugs, then it is approved by two supervisors. Do the two supervisors have to do the Apexus training?** Yes. Anyone who has responsibility for ordering 340B drugs, inventorying 340B drugs, or developing policy/procedure/protocol for 340B drugs should complete a 340B orientation.
- 18. When is the Title X Orientation course supposed to be completed by all FP staff?** November 30, 2016 at the FP National Training Centers website at <http://fpntc.org/training-and-resources/title-x-orientation-program-requirements-for-title-x-funded-family-planning>.
- 19. Who must complete the updated Title X Orientation course? Many staff took it years ago, do they have to take it again?** New hires and current FP program staff, including the Program Medical Director, by November 30, 2016.
- 20. So, rather than get all staff together for viewing the Title X Orientation course at the same time, is it better to watch individually since each person needs to document their attendance electronically?** It is permissible to complete this training in either an individual or a group setting. Completion certificates are ONLY available when each individual registers at the FPNTC. All staff must complete the WHB ONLINE attendance survey at <http://whb.ncpublichealth.com/provPart/training.htm>.