



Policies and Procedures

Peer Support Certification Training

2022



PAINTED BRAIN Policy and Procedures

SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Registration and Enrollment Process	PSCT 100.01	7/1/2022	5	
Refund/ Cancellation Policy				

PURPOSE

- 1.1 The purpose of this Policy is to outline the steps in the registration/application process and provide information regarding refunds and cancellation.

POLICY

- 1.2 Painted Brain’s Peer Support Certification Training is open to all eligible applicants. Participants are encouraged to enroll early, as enrollment is on a first-come, first-served basis. Space is limited. For information regarding the registration process, please visit the Painted Brain Website or email peersupporttraining@paintedbrain.org.

1.3 **Qualifications for acceptance into the training program:**

- Be age 18 or older. Provide a government-issued identification with photograph, such as driver’s license, identification card, or passport.
- Be a high school graduate or have completed a G.E.D., submissions of educational transcripts are required.
- Self-identify as a person who has direct personal experience living in recovery from mental health challenges or be a Parent/Caregiver/Family member of a peer.
- Have significant experience working on their own recovery and an ability to manage their own wellness.
- Have a desire to use their experiences to help others with their recovery.
- Be willing to publicly identify as a person living in recovery for the purpose of educating, role modeling, and providing hope to others about the reality of recovery.
- Agree, in writing, to adhere to the California Department of Health Care Services Code of Ethics for Medi-Cal Peer Support Specialists in California.
- Agree to complete an 80-hour training covering California’s 17-core competencies for Medi-Cal Peer Support Specialists.



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Registration and Enrollment Process Refund/ Cancellation Policy	PSCT 100.01	7/1/2022	5	

1.4 Refund Policy: Refund/Cancellation Policy

Refund Policies				
Cancellations made five (5) working days or more in advance of the training date, will receive a 100% refund. Cancellations for the different tracks are nonrefundable after the stated policy for each track.				
Track 1	2 weeks	Monday - Friday	9:00 AM - 5:30 PM	Cancellations made between 4 days prior to and the first day of class will incur a 20% fee. No refund is available after the first day of class.
Track 2a	5 weeks	Tuesday & Thursday	9:00 AM - 5:30 PM	Cancellations made between 4 days prior to and the first day of class will incur a 20% fee. No refund is available after the first day of class.
Track 2b	5 weeks	Monday & Wednesday	9:00 AM - 5:30 PM	Cancellations made between 4 days prior to and the first day of class will incur a 20% fee. No refund is available after the first day of class.
Track 3	8 weeks	Monday - Thursday	5:30 PM - 8:00 PM	Cancellations made between 4 days prior to and the first day of class will incur a 20% fee. No refund is available after the first day of class.



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No Refund Available: If participants are found sharing training materials outside of their training cohort/group at any time, their account will be blocked and no refund available.

PROCEDURES

1.5 Training Qualification Verification:

- Review the online orientation materials on the Painted Brain website and complete the self-assessment at the end. Participants must sign the acknowledgement at the end that they have reviewed the materials. This will enable them to apply for the Peer Support Certification Training.

Registrations/Applications are completed on the Painted Brain Website.

- Complete the application which includes preferred training track and course number and submit with payment by debit/credit card. Application for Peer Support Certification Training is not a competitive process; eligible applicants are accepted if there is availability in the track selected. You must register at least five days prior to the next scheduled training.
- Participants will need to submit verification documents in the Uploads section on the application. Acceptable documentation includes:
 - Government-issued identification with photograph: driver's license, identification card, or passport
 - High school diploma, G.E.D. diploma, or California High School Proficiency Certificate, or submissions of educational transcripts or proof of higher education
- Once your application and payment are received, your application will be reviewed by Painted Brain to verify eligibility. Participants will then have an



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Refund/ Cancellation Policy				

interview with a Painted Brain staff member. Eligible participants will receive a Welcome Letter with instructions on next steps and how to access training and policy documents. Participants will sign that they have agreed to the Peer Support Certification Training Policies and Procedures.

- 1.6 **Cost of Training:** Payments are made by a debit/credit card through the Painted Brain website. The current fee is \$1,600.

Payment plans are available at the time of purchase, if needed. The final payment must be received five days prior to the beginning of your training track. Refunds are available per the policy 1.4.

If applicable, individuals are responsible for arranging and paying for their own transportation to the training site, lodging during the training, and their meals.

- 1.7 **Refund/Cancellation Procedures:**

- Go to the **Course Cancellation** tab on the Painted Brain LMS student portal, Click **Refund**.
- Fill out the **Request Refund Form**.
- Click **Submit**.

Following these steps will cancel registration. Any refund can take up to 30 days to process. Refunds will go back to the original payment method. All deadlines must be met to be eligible for a refund (see 1.4). Participants will receive email confirmation of registration cancellation and refund request. If a participant has any questions, they should email us at peersupporttraining@paintedbrain.org.



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Refund/ Cancellation Policy				

- 1.8 **Appeals Process:** If a participant disagrees with a decision reached by Painted Brain regarding a refund request, a participant should put their refund request in writing and submit to the Program Supervisor at peersupporttraining@paintedbrain.org no later than 30 days after receiving the decision. Painted Brain will have the final decision on whether to grant this refund request in accordance with 1.4 and will communicate this decision via email..



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Request for Accommodations	PSCT 100.02	7/1/2022	2	

PURPOSE

- 1.1 To establish an agency-wide practice that accommodates participants with disabilities to have an equal opportunity to participate in the Peer Support Certification Training.

POLICY

- 1.2 Painted Brain is in compliance with the Americans with Disabilities Act of 1990, as amended, and section 504 of Rehabilitation Act.
- 1.3 Reasonable accommodation may take many forms, and it will vary by participant. Please note that according to the ADA, Painted Brain does not have to provide the exact accommodation requested, and if more than one accommodation works, we may choose a comparable accommodation.
- 1.4 Painted Brain does not have to provide an accommodation if doing so would cause undue hardship to the organization.

PROCEDURE

- 1.5 All participants requesting accommodations are required to communicate through our HIPAA-Compliant Accommodation Request Form, found at <https://www.paintedbrain.org/peer-training-support-ticket/> and selecting "Accommodation Request." This link will be readily available through the LMS student portal. If technical assistance is required, participants may reach out to the peersupporttraining@paintedbrain.org email address.
- 1.6 Upon receipt of their request, we will contact participants to discuss further their need for accommodation within 5 business days. We may ask for information from their health care provider(s) regarding the nature of their disability and the nature of their



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Request for Accommodations	PSCT 100.02	7/1/2022	2	

limitations or take other steps necessary to help Painted Brain determine viable options for reasonable accommodation.

- 1.7 The Program Supervisor will work with participants to determine whether their disability can be reasonably accommodated. If there are alternatives, they will be explored with the participants to try and find a mutually agreeable accommodation.
- 1.8 The peer support trainer assigned to the participant will be responsible for responding to the request via email.
- 1.9 Accommodations will include: Closed captioning/subtitles, transcription, screen viewer, assistance with keyboard shortcuts for commonly used Zoom controls, and assistance with cell phone specific view & navigation
- 1.10 **Appeals Process:** If a participant disagrees with a decision reached by Painted Brain regarding an accommodations request, a participant should put their appeals request in writing and submit to the Program Supervisor at peersupporttraining@paintedbrain.org no later than 30 days after receiving the decision. Painted Brain will have the final decision on whether to grant this accommodations request and will communicate this decision via email. There is no appeals process for unreasonable accommodations.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Training Schedule Policy	PSCT 100.03	7/1/22	2	

PURPOSE

- 1.1 The Peer Support Certification Training schedule is intended to enable individuals to master the basic competencies necessary to function as an effective Peer Support Specialist and to sit for and pass the California state exam within a reasonable time frame.

POLICY

- 1.2 The Peer Support Certification Training follows the 17-core competencies established by the State of California and is an eighty-hour (80) virtual intensive course.

Participants are expected to:

- Attend all days of training with no absences (*see note below*);
- Actively participate in discussions and role plays; and
- Complete all homework assignments.

And because this training is for employment in the workforce, participants are also expected to:

- Be at their computers, in a work friendly and confidential environment;
- Show their face on-screen.

Individuals who do not meet these criteria are not eligible to receive a certificate of completion.

*Note: Painted Brain expects participants to be present for the entirety of the training. However, Painted Brain recognizes that important issues may arise that require them to miss a portion of the training. If the participant needs to be absent for a class or portion of a class, they must confirm with the trainer prior to their absence when circumstances allow for this. *See the Make-up of Assignments or Coursework Policy.*



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Training Schedule Policy	PSCT 100.03	7/1/22	2	

PROCEDURES

1.3 **Painted Brain’s 17-Core Competency Training Manual.** The training manual will be available on Painted Brain’s LMS student portal to participants 3 days before their training begins.

1.4 **Training Schedule:**

Track 1	2 Weeks	Monday - Friday	9:00 AM - 5:30 PM	Lunch, morning, and afternoon breaks are provided each day.
Track 2a	5 Weeks	Monday & Wednesday	9:00 AM - 5:30 PM	Lunch, morning, and afternoon breaks are provided each day.
Track 2b	5 Weeks	Tuesday & Thursday	9:00 AM - 5:30 PM	Lunch, morning, and afternoon breaks are provided each day.
Track 3	8 Weeks	Monday - Thursday	5:30 PM - 8:00 PM	A break is provided midway through each session

1.5 **Test-Prep Assessment:** The Test-Prep Assessment is administered on-line on Painted Brain’s LMS student portal and is available by 9:00 am the day following the completion of training. It will remain available for 5 calendar days.

Individuals who do not pass the knowledge assessment the first time are eligible to retake it a second time upon request.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Training Methodologies	PSCT 100.04	7//2022	1	

PURPOSE

- 1.1 To provide various opportunities for participants to learn and prepare for the Medi-Cal Peer Support Specialist Certification exam.

METHODOLOGY

- 1.2 Trainer will facilitate virtual training sessions via the Zoom platform.
- 1.3 PowerPoint presentations will create the structure for training each core competency. Participants have access to PowerPoint presentations, Painted Brain's 17 Core Competencies Training Manual, worksheets, and other materials via Painted Brain's LMS student portal. Participants will be encouraged to utilize training materials throughout the training.
- 1.4 Training sessions will include interactive activities including group discussions, role-play exercises, informational videos, and written activities to develop tools that support wellness.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Make-up of Assignments or Coursework	PSCT 100.05	7/1/2022	2	

PURPOSE

- 1.1 To allow participants enrolled in the Peer Support Certification Training to complete the assignments and coursework they missed due to circumstances that were beyond their control.

POLICY

- 1.2 Make-up of assignments and coursework is available when there are circumstances that are beyond the participant's control, and when the participant has notified the trainer and received approval in advance of or as soon as possible in the event of an emergency, that they are unable to attend a class or a portion of a class session or are unable to complete assignments. Missed assignments or coursework must be submitted within 3 class sessions following the missed session/portion of a session. All assignments and coursework must be submitted within 5 business days following the completion of the training in which they are currently enrolled.
- 1.3 This policy is intended only for circumstances beyond the control of the participant and not intended for a general inability or choice to not attend training sessions as scheduled.

PROCEDURES

- 1.4 **Forms:** All forms are located, completed, submitted and processed via Painted Brain's Make-Up Assignment Form (see 1.5 below).
- 1.5 **Make-up Request Assignments and Coursework Form:**
 - All participants requesting make-up assignments are required to communicate through our HIPAA-Compliant Make-Up Assignment Request Form, found at <https://www.paintedbrain.org/peer-training-support-ticket/> and selecting "Make Up Assignment." This link will be readily available through the LMS student portal. If technical assistance is required, participants may reach out to the peersupporttraining@paintedbrain.org email address. Participants will receive a response (without including personal health information) via email.



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Make-up of Assignments or Coursework	PSCT 100.05	7/1/2022	2	

- The trainer assigned to the participant or Training Supervisor will review the Request Form and provide the participant with a list and instructions for the assignments and coursework that needs to be completed related to the content missed. Each participant in the Peer Support Certification Training will receive no more than 3 make-up sessions that can be accessed through the LMS student portal. Make-up materials will include reading of the Peer Support Certification Training Core Competency(ies) missed, worksheets, and assignments to ensure the participant has fully understood the module.

1.6 **Submission:** Participants complete any coursework and submit all required responses.

1.7 **Review of Submitted Materials:** The trainer assigned to the participant or the Training Supervisor will review responses for thoroughness and comprehension of the topic materials. When responses are approved, credit will be applied to the participant's training transcript.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Confidentiality of Other Participants	PSCT 100.07	7/1/2022	1	

PURPOSE

- 1.1 To clarify the confidentiality rights of Other or Third Party participants and the responsibilities of Painted Brain.

POLICY

- 1.2 If a participant enrolled in the Training program discusses a(n) “Other Participant” or “Third Party,” or brings other adults and/or youth into a conversation/conference while participating in activities, Painted Brain agrees that the information received including, but not limited to, personal identifiable information will be treated as Confidential Information.

- 1.3 The Peer Support Certification Training is understood to be a safe place for participants to learn, grow, and share experiences for the benefit of their own learning and that of the other participants. Because of this, Painted Brain expects participants to maintain the confidentiality of others in the course.

* In this document, “Participants” includes employees, volunteers, participants, and guests.

- 1.4 **Mandatory Reporting:** Nothing in this Policy shall be interpreted in a manner inconsistent with State or local law governing mandatory reporting. All Painted Brain staff shall be trained on their reporting requirements and all participants in the program shall be informed of certain information, such as the fact that suspected cases of abuse or neglect of children, elderly adults, and dependent adults cannot be held in confidence under California state law.

PROCEDURE

- 1.5 This policy, along with all other Policy & Procedures Documents, will be readily available to participants via the LMS student portal.



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Confidentiality of Other Participants	PSCT 100.07	7/1/2022	1	

1.6 Painted Brain expects participants to maintain the confidentiality of others in the course. This will be stated at the beginning of the course and as needed throughout the course. Disciplinary action, up to and including removal from the Peer Support Certification Training Program, will be taken against any participant who is found to have engaged in conduct prohibited by this policy.

1.7 **How to Report:** Participants should reference Painted Brain’s “Complaints and Grievance Policy & Complaints Process” for guidance on reporting a violation of confidentiality.

As needed, participants should also reference Painted Brain’s “Policy on Anti-Harassment” and “Policy on Non-Discrimination” if the participant believes the infraction may rise to the level of harassment and/or discrimination.

1.8 Participants will receive responses (without including personal health information) via email, according to the timeframes established in Painted Brain’s “Complaints and Grievance Policy & Complaints Process,” “Policy on Anti-Harassment,” and “Policy on Non-Discrimination.”



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Availability of Material in Prevalent Languages	PSCT 100.08	7/1/2022	1	

PURPOSE

1.1 To meet the language needs of the populations served.

AVAILABILITY

- 1.2 Peer Support Certification Training materials are currently available in English and will be completely translated into Spanish by the first quarter of 2023. Monolingual Spanish language training will be offered at least annually from that point forward, and there will be a Spanish language application available on the Painted Brain Peer Support Certification Training application webpage (<https://paintedbrain.org/peer-support-specialist-certification/>) in addition to the English language version. Spanish language outreach materials will also be disseminated via social media and Painted Brain's website to alert Spanish speaking peers of the availability of this training option.
- 1.3 To request Spanish Language Peer Support Certification Training, participants will complete a Spanish language application or request Spanish language training in an English language application.
- 1.4 Additional languages will be considered for translation if there is an identified need **and** sufficient funding exists. Potential participants can contact the Program Supervisor through email (peersupporttraining@paintedbrain.org) to discuss their request. Painted Brain will respond to such requests within 30 days via email.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Evaluation of Training	PSCT 100.09	7/1/2022	1	

PURPOSE

- 1.1 To create the opportunity for the Peer Support Certification Training participants to provide their perspective on the effectiveness of the training, of the trainer, and trainees satisfaction, so that the quality and effectiveness of the training can be improved.

POLICY

- 1.2 All online courses, virtual and in-person training will be evaluated for quality and effectiveness.

PROCEDURES

- 1.3 20 minutes will be set aside at the end of each training day for participants to complete the Training Evaluation Form that is reflective of that day's training.
- 1.4 Trainers will verify Core Competencies covered and the Course Training Number for each evaluation.
- 1.5 The Program Supervisor will review the Training Evaluation outcomes and determine (in conjunction with Painted Brain training leadership) any changes to content or additional instructor training that may be needed. These changes and/or training will be identified and a plan of action created to address this feedback.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Request for Leave of Absence	PSCT 100.10	7/1/2022	2	

PURPOSE

- 1.1 To allow participants enrolled in Peer Support Certification Training to complete missed portions of the training, due to their withdrawal from the program because of circumstances that are life-changing and/or beyond their control.

POLICY

- 1.2 Painted Brain will make leave of absence requests available when there are circumstances that are life-changing and/or beyond the participant's control **and** the participant has demonstrated adequate completion of course material up until the point at which the leave begins. The participant will agree to withdraw from their current training course and resume participation from the point at which they left the training. An anticipated date of return will be agreed upon to ensure the participant completes the program.
- 1.3 If a participant is granted a leave of absence that is longer than 6 months, the participant must start a new training course from the beginning to ensure adequate comprehension and retention of materials. This is not available to individuals who received scholarship opportunities which have lapsed.

PROCEDURES

- 1.4 **Request for Leave of Absence Form.**
Participants will complete the Request for Leave of Absence Form as soon as they are aware of a situation that will require their temporary withdrawal from the program. A temporary withdrawal means that the participant is anticipating their ability to resume the training course within the Medi-Cal timeframe for coursework completion when



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Request for Leave of Absence	PSCT 100.10	7/1/2022	2	

applicable for scholarship purposes. The Program Supervisor will review the request and follow up with the participant to confirm details.

- 1.5 All participants requesting a Leave of Absence are required to communicate through our HIPAA-Compliant Leave of Absence Request Form, found at <https://www.paintedbrain.org/peer-training-support-ticket/> and selecting “Leave of Absence.” This link will be readily available through the LMS student portal. If technical assistance is required, participants may reach out to the peersupporttraining@paintedbrain.org email address. Participants will receive a response (without including personal health information) via email.
- 1.6 **Appeals Process:** If a participant disagrees with a decision reached by Painted Brain regarding a leave of absence request, a participant should put their appeals request in writing and submit to the Program Supervisor at peersupporttraining@paintedbrain.org no later than 30 days after receiving the decision. Painted Brain will have the final decision on whether to grant this appeals request. Participants will receive this (without including personal health information) via email.
- 1.7 **Readmission from Leave of Absence:** The participant will be instructed on how and when to resume participation in the program, starting from where they withdrew. Participants will email peersupporttraining@paintedbrain.org to establish a readmission start date and participation details.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Hours of Operation	PSCT 200.01	7/1/2022	1	

PURPOSE

- 1.1 To establish the official workweek and business hours of operation.

POLICY

- 1.2 Painted Brain's hours of operation are 8:30 AM to 5:30 PM (PST), Monday through Friday. Contact via email at peersupporttraining@paintedbrain.org.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
POLICY FOR UNDER THE INFLUENCE	PSCT 200.02	7/1/2022	2	

PURPOSE

- 1.1 To establish a policy that prohibits the use or possession of illegal drugs, marijuana, or alcohol in the program setting. Employees, volunteers, participants, and guests must comply with this policy.

POLICY

- 1.2 Painted Brain is committed to maintaining a safe, efficient, and productive work environment. The phrase “under the influence” refers to impairment, to any degree, of a participant's ability to safely perform the activity in question as a result of the use of alcohol, drugs, or a combination of both. Participants may not use or possess alcohol, marijuana, or illegal drugs or misuse legal or prescription drugs, or be under the influence of these, while participating in Painted Brain classroom training.
- 1.3 Participants are expected to maintain the Medi-Cal Code of Ethics for Peer Support Specialists in California throughout the entirety of their training experience. This will be included in the Introductory Letter sent to new participants prior to starting class.

* In this document, “Participants” includes employees, volunteers, participants, and guests

PROCEDURES

- 1.4 This policy, along with all other Policy & Procedures Documents, will be readily available to participants via the LMS student portal.
- 1.5 **Sanctions for participants under the influence:** If a participant is suspected of using or possessing alcohol, marijuana, or illegal drugs or misusing legal or prescription drugs, or to be under the influence of these, the Program Supervisor will be made aware. A phone call or Zoom discussion will take place between the Program Supervisor and the individual in question, arranged via email. If this person is an employee, the Painted Brain employee policies will be utilized internally. If this person is a volunteer, participant, or guest, a conversation about their ability to participate in class will be



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POLICY FOR UNDER THE INFLUENCE	PSCT 200.02	7/1/2022	2	

discussed, with possible sanctions ranging from having to make up classwork to taking a leave of absence.

- 1.6 **Prescription drug use:** If participants need to take a prescription drug that could have any effect upon their ability to perform their training activities, participants must discuss possible reasonable accommodations with the trainer during the participant's use of that drug so that they are not working in an impaired state. Please refer to Make-up Assignments or Coursework Policy for additional information.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Policy on Anti-harassment	PSCT 200.03	7/1/2022	3	

PURPOSE

- 1.1 To provide a safe work and learning environment free from harassment for employees, volunteers, participants, and guests.

POLICY

- 1.2 Painted Brain prohibits sexual harassment and harassment based on race, religious belief (including dress or grooming practices), color, sex, sex stereotype, pregnancy, childbirth or related medical conditions (including breastfeeding), age, national origin, ancestry, sexual orientation, gender identification and expression, transgender status, transitioning status, physical or mental disability, medical condition, genetic characteristics, genetic information, family care, marital status, enrollment in any public assistance program, status as past or future military service, a veteran or qualified disabled veteran, status as an unpaid intern or volunteer, or any other basis protected by federal, state, or local law or ordinance or regulation. We also prohibit harassment based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics. Prohibited harassment is defined as verbal, physical, and visual behavior.
- 1.3 All personnel must fully cooperate in the investigation process. We will not retaliate against any participant (employees, volunteers, participants, and guests) for filing a complaint or participating in an investigation, and we will not tolerate or permit retaliation against you by management, supervisors, employees, independent contractors, or other persons.

* In this document, "Participants" include employees, volunteers, participants, and guests



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Policy on Anti-harassment	PSCT 200.03	7/1/2022	3	

- 1.4 Disciplinary action, up to and including discharge, will be taken against any participant who is found to have engaged in conduct prohibited by this policy.

PROCEDURES

- 1.5 **How to Report:** If a participant believes they have been harassed, discriminated or retaliated against, or bullied, or have witnessed an incident of harassment, discrimination, retaliation, or bullying, they must submit a Complaints and Grievance Form HR at hr@paintedbrain.org as soon as possible after the incident.
- 1.6 **Reasonable Timeframes:** Painted Brain will fairly promptly and thoroughly investigate your complaint/grievance. Painted Brain will inform the complainant, the accused, and any other involved persons about the general results of our investigation (without disclosing personal health information) via email. The investigation will be conducted internally or externally by an impartial and qualified investigator. The investigation process will be documented and tracked for reasonable progress to ensure a timely resolution. Although we cannot promise complete confidentiality, Painted Brain will maintain confidentiality to the extent permitted by law and will be as discreet as possible throughout the investigation process.
- 1.7 **Grievance (Witten) Process:** A formal grievance related to sexual harassment and harassment will be acknowledged within 48 hours via email. An acknowledgement will confirm who is dealing with the complaint and when the complainant can expect a reply. A copy of this Policy on Anti-Harassment will be attached or a link provided.

If the grievance has not already been resolved, the Program Supervisor or a member of the Executive Team will investigate and take appropriate action within 5 working days. In many cases, a grievance is best resolved by the person responsible for the issue being complained about, and if appropriate they should try to do so. If needed, a meeting can



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Policy on Anti-harassment	PSCT 200.03	7/1/2022	3	

be scheduled so that all parties can work together to find resolution. This will be done within 5 business days of the end of our investigation.

Painted Brain will inform the complainant, the accused, and any other involved person(s) about the general results of our investigation via email. The grievance and its agreed upon resolution(s) or further actions will be sent to the complainant within 7 business days of the time frames listed above. If they do not want a meeting or it is not possible, we will send a detailed reply to the complainant. This will include suggestions for resolving the matter. This will be done within 5 business days of completing our investigation.

Documents received from the complainant and details of the grievance will be completed on the Complaints and Grievance Form and updated as needed.

- 1.8 Participants will receive responses (without including personal health information) via email.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE(S)	LAST UPDATE
Policy on Non-Discrimination	PSCT 200.04	7/1/2022	3	

PURPOSE

- 1.1 To provide a safe work and learning environment free from discrimination for employees, volunteers, participants, and guests.

POLICY

- 1.2 Painted Brain prohibits discrimination based on the following categories: race (such as hair texture and “protective hairstyle” etc. including braid lock or twist), religious belief (including dress or grooming practices), color, sex, sex stereotype, pregnancy, childbirth or related medical conditions (including breastfeeding), age, national origin (physical, cultural, or linguistic characteristics associated with national origin, tribal affiliation, person’s name that is associated with national origin group), ancestry, sexual orientation, gender identification and expression, transgender status, transitioning status, physical or mental disability, medical condition, genetic characteristics, genetic information, family care, marital status, enrollment in any public assistance program, status as past or future military service, a veteran or qualified disabled veteran, status as an unpaid intern or volunteer, or any other classification protected by law.
- 1.3 All personnel must fully cooperate in the investigation process. Painted Brain will not retaliate against Participants (employees, volunteers, participants, and guests) for filing a complaint or participating in an investigation, and we will not tolerate or permit retaliation against you by management, supervisors, employees, independent contractors, or other persons.

* In this document, “Participants” include employees, volunteers, participants, and guests
- 1.4 Disciplinary action, up to and including discharge, will be taken against any participant who is found to have engaged in conduct prohibited by this policy.



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Policy on Non-Discrimination	PSCT 200.04	7/1/2022	3	

PROCEDURES

- 1.5 **How to Report:** If a participant believes they have been harassed, discriminated or retaliated against, or bullied, or have witnessed an incident of harassment, discrimination, retaliation, or bullying, they must submit a Complaint and Grievance Form to HR at hr@paintedbrain.org as soon as possible after the incident.
- 1.6 **Reasonable Timeframes:** Painted Brain will promptly and thoroughly investigate each complaint/grievance. Painted Brain will inform the complainant, the accused, and any other involved person(s) about the general results of our investigation via email. The investigation will be conducted internally or externally by an impartial and qualified investigator. The investigation process will be documented and tracked for reasonable progress to ensure a timely resolution. Although we cannot promise complete confidentiality, Painted Brain will maintain confidentiality to the extent permitted by law and will be as discreet as possible throughout the investigation process.
- 1.7 **Grievance (Written) Process:** A formal grievance related to discrimination will be acknowledged within 48 hours via email. An acknowledgement will confirm who is dealing with the complaint and when the complainant can expect a reply. A copy of this Policy on Non-Discrimination will be attached or a link provided.

If the grievance has not already been resolved, the Program Supervisor or a member of the Executive Team will investigate and take appropriate action within 5 working days. In many cases, a grievance is best resolved by the person responsible for the issue being complained about, and if appropriate they should try to do so. If needed, a meeting can be scheduled so that all parties can work together to find resolution. This will be done within 5 business days of the end of our investigation.

Painted Brain will inform the complainant, the accused, and any other involved persons about



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the general results of our investigation via email. The grievance and its agreed upon resolution(s) or further actions will be sent to the complainant via email within 7 business days of the time frames listed above. If they do not want a meeting or it is not possible, we will send a detailed reply to the complainant. This will include suggestions for resolving the matter. This will be done within 5 business days of completing our investigation.

Documents received from the complainant and details of the grievance will be completed on the Complaints and Grievance Form and updated as needed.

- 1.8 Participants will receive responses (without including personal health information) via email.



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Complaints and Grievance Policy & Complaints Process	PSCT 200.05	7/1/2022	5	

PURPOSE

- 1.1 We recognize that in any environment in which people interact regularly, conflicts, complaints and concerns may arise. These issues may be between individuals, with staff or regarding specific policies or rules. This policy and procedures are in place to ensure a process to informally address a complaint or to formally log a grievance, be heard and have an opportunity for resolution. It is also a way to gather information which helps us improve what we do.

POLICY

- 1.2 All participants (volunteers, participants, and guests) have the right to file a complaint and reach a resolution. The conditions for expressing a complaint or grievance are defined as dissatisfaction with decisions concerning the participant and/or services provided to them.

* In this document, "Participants" includes volunteers, participants, and guests.

Participants have the right to file a complaint or a grievance without interference or fear of retaliation. All staff and volunteers are to be attentive and respectful to any grievance registered by a participant and are prohibited from discouraging, intimidating, or seeking retribution against those who seek to exercise their rights to file a complaint or grievance.

All complaint and grievance information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

Policy and procedures for filing a complaint or a grievance are posted on the Painted Brain website, at agency facilities, and included in training manuals/materials.



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Participants have the right to a timely notification of the resolution and receive an explanation of any further appeal, rights, or recourse. All participants have the right to at least one level of review that does not involve the person about whom the complaint has been made or the person who made the decision under review.

DEFINITIONS

Complaint: For participants, a complaint is a *verbal* expression of dissatisfaction or discomfort that can include but is not limited to aspects of service delivery, manner of treatment, outcomes, or experiences.

Grievance: For participants, a grievance is a formal *written* expression of dissatisfaction or discomfort that can include, but is not limited to aspects of service delivery, manner of treatment, outcomes, or experiences. *All complaints received in writing, including email, are considered formal grievances.* If a participant does not wish to or is unable to submit a written expression of dissatisfaction, they may request that the formal grievance be documented by the staff person receiving the verbal report.

PROCEDURES

- 1.3 **Complaints (Verbal) Process:** In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the complaint has been received by that person, they should try to do so if possible and appropriate. If the employee who can best address the complaint is available, ask the complainant if it would be ok to include them in the conversation. If needed, a meeting can be scheduled within 5 business days of the complaint, so that all parties can work together to resolve it. If the parties were unable to resolve the complaint, the Program Supervisor or a member of the Executive Team will investigate and take appropriate action within 5 business days of resolution failure.

The complaint and its resolution(s) or further actions will be sent to the complainant within 7 business days of the time frames listed above via email. For a complaint the



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details will be entered by the person who receives the complaint on the Complaint and Grievance Form and entered into our customer feedback tracker within 4 business days and updated as needed.

The Painted Brain employee who receives a complaint in person or by phone will gather the following information requested on the Complaint and Grievance Form:

- (1) Date of the complaint
- (2) Facts of the complaint
- (3) Complainant's name, address, email, and telephone number
- (4) Relationship of the complainant to Painted Brain
- (5) Employee name

Painted Brain will give or send the complainant a copy or the link to the Policy and Procedures and the Complaint and Grievance Form located on the Painted Brain website.

- 1.4 **Grievance (Witten) Process:** A formal grievance is a written expression of dissatisfaction or discomfort. If a complaint is received in writing, *it is considered a formal grievance.*

Participants filing formal grievances are able to submit their complaint through our HIPAA-Compliant Complaint/Grievance Form, found at <https://www.paintedbrain.org/peer-training-support-ticket/>, and selecting "Complaint/Grievance." This link will be readily available through the LMS student portal. If technical assistance is required, participants may reach out to the peersupporttraining@paintedbrain.org email address. Participants will receive response(s) to their complaint (without including personal health information) via email.

The grievance will be acknowledged within 48 hours and will be logged to our customer feedback register within 2 working days. An acknowledgement will confirm who is dealing with the complaint and when the complainant can expect a reply. A copy of this



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complaints procedure will be attached or the link to the Policy and Procedures and the Complaint and Grievance Form located on the Painted Brain website.

If the grievance has not already been resolved, the Program Supervisor or a member of the Executive Team will investigate and take appropriate action within 5 working days. In many cases, a grievance is best resolved by the person responsible for the issue being complained about, and if appropriate they should try to do so. If needed, a meeting can be scheduled so that all parties can work together to find a resolution. This will be done within 5 business days of the end of our investigation.

The grievance and its agreed upon resolution(s) or further actions will be sent to the complainant within 7 business days of the time frames listed above. If they do not want a meeting or it is not possible, we will send a detailed reply to the complainant. This will include suggestions for resolving the matter. This will be done within 5 business days of completing our investigation.

Documents received from the complainant and details of the grievance will be completed on the Complaints and Grievance Form and entered into our customer feedback register within 4 business days and updated as needed.

- 1.5 Escalation Process:** If the complainant feels that their problem has not been satisfactorily resolved, they can request that the complaint is reviewed at the Board level. At this stage, the complaint/grievance will be passed to the Executive Team who will pass to the Board. The request for Board level review will be acknowledged within 4 business days of receiving it. The acknowledgement will confirm who will deal with the case and when the complainant can expect a reply. The Board may investigate the facts of the case themselves or delegate a suitably senior person to do so. This may involve reviewing the case and speaking with the person who dealt with the initial complaint/grievance. If the complaint/grievance relates to a specific person, they will be informed and given a further opportunity to respond. Complaints/grievances will receive



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a definitive reply within 10 working days. If this is not possible because for example, an investigation has not been fully completed, a progress report will be sent with an indication of when a full reply will be given. The decision taken at this stage is final.

- 1.6 **Continuous Improvement:** Painted Brain monitors and reviews the effectiveness of our complaints handling process to ensure that this continuously improves our learnings and that complaints are carried through into the organization. This policy does not cover complaints/grievances from staff who should review the Employee Handbook (section 2.2 Open Door Policy of the Handbook). Overall responsibility for this policy and its implementation lies with the HR Manager. Complaints are reviewed annually to identify any trends which may indicate a need to take further action.



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Maintenance of Records Policy	PSCT 200.06	7/1/2022	2	

PURPOSE

- 1.1 To safely keep track of and have easy access to trainee information and documentation related to training status and support services.

POLICY

- 1.2 Follow HIPAA storage security rules, which include physical, administrative and technical protections to prevent unauthorized access.

PROCEDURES

- 1.4 This policy, along with all other Policy & Procedures Documents, will be readily available to participants via the LMS student portal.

1.3 Storage:

- All paper training records, clinical and case management records, documentation, and correspondence shall be in locked file cabinets, in a manner that is accepted by standards of professional practice and HIPAA compliance.
- Electronic training records, clinical case management records, documentation, and correspondence shall be maintained in a manner that is accepted by standards of professional practice and are maintained in a HIPAA-compliant server and customer relations management system and will be monitored 24/7 through anti-malware software, including ASCII Sha-256 encryption to ensure security of non-public data. Regular backups will be generated and access authorization with proper user roles and privileges will be set including restriction of physical access to the infrastructure.

1.4 Retention:

- All paper records created for entry into the HIPAA-compliant server and customer relations management system *after its implementation* will be destroyed (shredded) once it is confirmed that the document(s) were successfully entered.



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- Documents originally created as part of a paper clinical record *must be returned to the paper clinical record after entering into the HIPAA-compliant server and customer relations management system* and are subject to the retention period in 1.6.

1.5 **Kinds of Records Retained:** Records retained in the HIPAA-compliant server and customer relations management system may include:

- Participant's legal name
- Participant's date of birth
- Participant's email address, phone number, and/or home address
- Participant's correspondences with Painted Brain, including requests for accommodation, requests for make-up assignment, and requests for leave of absence
- Dates of training
- Status of course (pass/fail)
- Participant's feedback regarding the course

These records may include personal health information, if the participant's correspondences to Painted Brain included this information.

1.6 **Retention Period:**

- All records entered into the HIPAA-compliant server and customer relations management system are retained indefinitely. If a new system is established, records will be transferred to it. These records will be retained for:
 - 10 years following the conclusion of services;
 - 10 years after completion of all County, State and/or federal audits; or
 - 10 years after the conclusion of any audit appeal and/or when audit findings are fully resolved.



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1.7 Destruction of Documents:

- Document destruction through shredding, or any other method that renders data irrecoverable to protect against the threat of a data breach;
- Clearing, overwriting, or purging electronic media; or
- Third-party disposal or destruction services through an approved vendor