

Administrator Alert

Policy updates & rule clarifications for Assisted Living, Residential Care & Nursing Facilities

Office of Licensing & Quality — Oregon Department of Human Services

February 2, 2012

Caregiver Training Requirements in CBC's

Providers may have noted that for a time surveyors did not review training records unless there were outcomes to how services were provided to residents. It was noted during a recent review by Centers for Medicare and Medicaid Services (CMS) that surveyors did not consistently review training records during licensing surveys. Because of this finding, surveyors are now reviewing training records on staff at all surveys. It is important to note that training and documentation of training is a rule requirement and whether surveyors review training records or not, the requirement for compliance remains the responsibility of the licensee.

Surveyors will be conducting a review of the training records by:

- Reviewing a list of staff and their hire dates and choosing a sample of five employees;
- Two of these five employees will have worked at the facility for longer than one calendar year. This is to ensure that the employees have received their job descriptions and are in compliance with receiving their pre-service orientation, demonstrated knowledge and performance in the elements required in rule, were trained in abdominal thrust and are current with in-service hours;
- The other three will be employees who have been more recently hired to determine if they received their job description, have received their pre-service orientation, demonstrated knowledge and performance in the elements required in rule within the first 30 days of hire and have been trained in abdominal thrust;
- Throughout the survey process, surveyors will be interviewing staff regarding their training. Surveyors will also examine the documentation regarding training for each employee and will use the “CBC Caregiver Training Record Review and Interview 370” when conducting this review. (Please see the Supportive Document attached to this Administrator Alert)

Surveyors will take the following into account when determining compliance;

- Documented evidence that the required training occurred.



- The timing of the training, for example, was pre-service orientation and/or demonstration of knowledge provided two or three months after the person was hired and is providing care to residents; and
- Is there a pattern regarding a lack of training or a lack of documenting the training.

We will do a thorough review of the survey process in the near future and additional changes may be made for consistency and brevity, but please remember that as a licensed facility compliance with the rules is your responsibility.

Action:

Providers should review their training policies and documentation to ensure that they are in compliance with training requirements.

Rule Reference:

OAR 411-054-0070 (2) (3) - Tags 365 and 370