

In-Home Care (IHC) Update

Health Care Regulation & Quality Improvement
Section

In-Home Care Program



IHC Survey Activity 2024-25

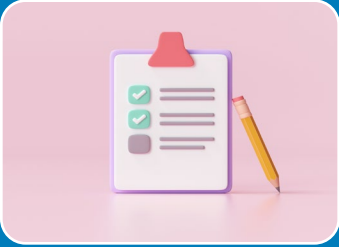
Total IHC Agencies Licensed: 217 as of 1/1/2026

Survey Type	2025 [1/1/25-12/31/25]	2024 [1/1/24-12/31/24]
Initial survey - licensed	17	20
Initial applications - pending	48	32
Complaints investigated	58	58
Relicensure surveys	69	64
Revisit (follow-up) surveys	5	8
Change in licensure classification surveys	6	6
Licenses not renewed	8	10

IHC Citation Activity 2025

Top 10 IHC Survey Citations (12/31/25)	
Tag Number and Title	Frequency
0530 - Service Plan Elements - rev. 10.2023	46
0575 - Caregiver Orientation	37
0580 - Caregiver Training - rev. 10.2023	37
0675 - Client Records Maintenance & Contents	37
0620 - Medication Administration - rev. 10.2023	33
0525 - Service Plan Development & Completion	30
0555 - Monitoring Visit Activities & Documentation	29
0405 - Medication Reminding Documentation	24
0410 - Client Self-Direct Evaluation	20
0460 - Administrator Responsibilities	20

Citation Causes — Service Plans & Training



0530 — Service Plan Elements

- Missing medical conditions
- Missing PCP
- Missing medication or nursing service requirements



0580 — Caregiver Training

- Missing required topics
- QE certificates not aligned with approved modules
- Incorrect or missing 8-hour training documentation



0575 — Caregiver Orientation

- Missing required topics
- Incorrect or missing 4-hour orientation documentation

Citation Causes — Records & Medication



0675 — Client Records Maintenance

- Missing daily caregiver notes
- Missing observations or reported concerns



0620 — Medication Administration

- Missing 90-day RN medication evaluation
- Missing physician orders/signatures
- MAR does not match medication list
- Missing narcotics/controlled substance documentation



0525 — Service Plan Completion

- Missing client or representative signature

Citation Causes — Monitoring & Self-Direction



0555 — Monitoring Visits

- Missing one or more 90-day visits
- Missing required questions



0405 — Medication Reminding Documentation

- Missing Self-Direct Medication Evaluation Forms
- Non-standard forms missing required elements



0410 — Client Self-Direct Evaluation

- Missing required 90-day evaluations

Citation Causes — Administrator Responsibilities (0460)

Common issues include missing documentation for:

Internal
investigations

Investigation
results and
interviews

Actions taken
and monitoring

Abuse/neglect
reporting

Reporting
client condition
changes

IHC Survey Trends

Administrator Requirements (OAR 333-536-0052)

Qualifications

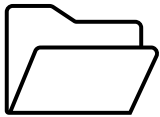
- Must meet all requirements in 333-536-0052(1)
- Definitions in 333-536-0005(20) & (35)

Designee & Delegate Rules

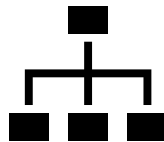
- **Designee:** One person, assigned in writing; must meet full admin qualifications
- **Delegate:** May perform limited tasks under 0052(4)
- **Availability:** Admin or designee must be reachable during all service hours

Administrator Responsibilities

- Organize and direct agency functions



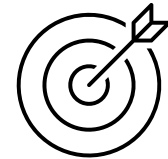
- Conduct on-premises supervision and direct observation



- Be physically on-site multiple days per week



- Ensure accuracy of public information



- Ensure services follow written service plans



- Ensure staff meet qualification, orientation, training, and competency requirements



- Ensure practices match agency policies



Additional Administrator Responsibilities:

Client assignments:
Must match caregiver skills and competence

Client acceptance:
Agency must not accept clients beyond its capability

Internal investigations: Must be timely, complete, and documented

Mandatory reporting:
Abuse/neglect must be reported to ODHS, OHA, or law enforcement

Condition changes:
Must be documented and incorporated into service plan

Administrator Designee Use — Survey Findings

Key points:

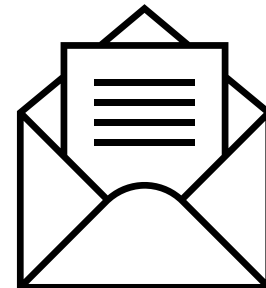
- Designee must be **temporary only**
- Designee must meet **full administrator qualifications**
- Surveyors report increased **permanent or semi-permanent** designee use
- Many designees are **office/scheduling staff** who do not qualify
- Designees must **not function as de facto administrators**



72-Hour Survey Notification — Agency Response Issues

Key points:

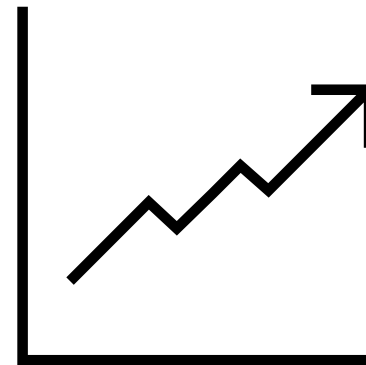
- OHA must send relicensure survey notice **≥72 hours** before entrance
- Notice goes to the **administrator's email** in the licensure portal
- Email must be checked regularly, especially late week
- **No rescheduling** of surveys
- 60% response rate; 40% report “did not receive”
- Compliance required under **333-536-0041**



Why This Matters — Citation Trends

2025 Findings:

- **Violations Tag 755** was cited 10 times
- In **9** cases, admin tasks, delegation, and availability were also cited
- In **7** cases, designee was in charge most/all of the time
- During the survey, Surveyors will now ask about:
 - Designee duration
 - Admin on-premises presence
 - Documentation of compliance



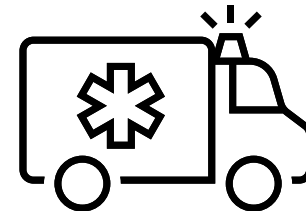
OHCA Question 1 – CPR Direction from 911

Question:

If a 911 operator instructs a caregiver to give CPR, should they do it even if untrained?

Answer:

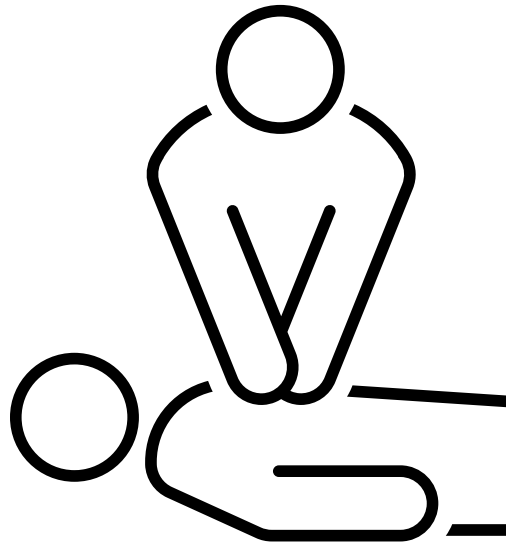
- CPR is **recommended**, not required (333-536-0070(7)(M))
- Agencies must match staffing to client expectations
- If a client requires CPR in emergencies, the agency must:
 - Assign CPR-trained staff **or**
 - Disclose inability to meet this need



OHCA Question 1 – CPR Additional Guidance

Key points:

- Agencies must disclose caregiver training limitations during intake
- If CPR is a required service, agencies may need to **decline service** unless CPR-trained staff are available



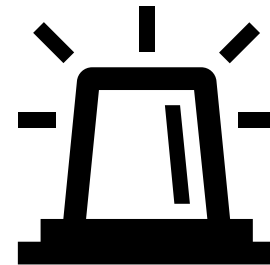
OHCA Question 2 – Narcan Administration

Question:

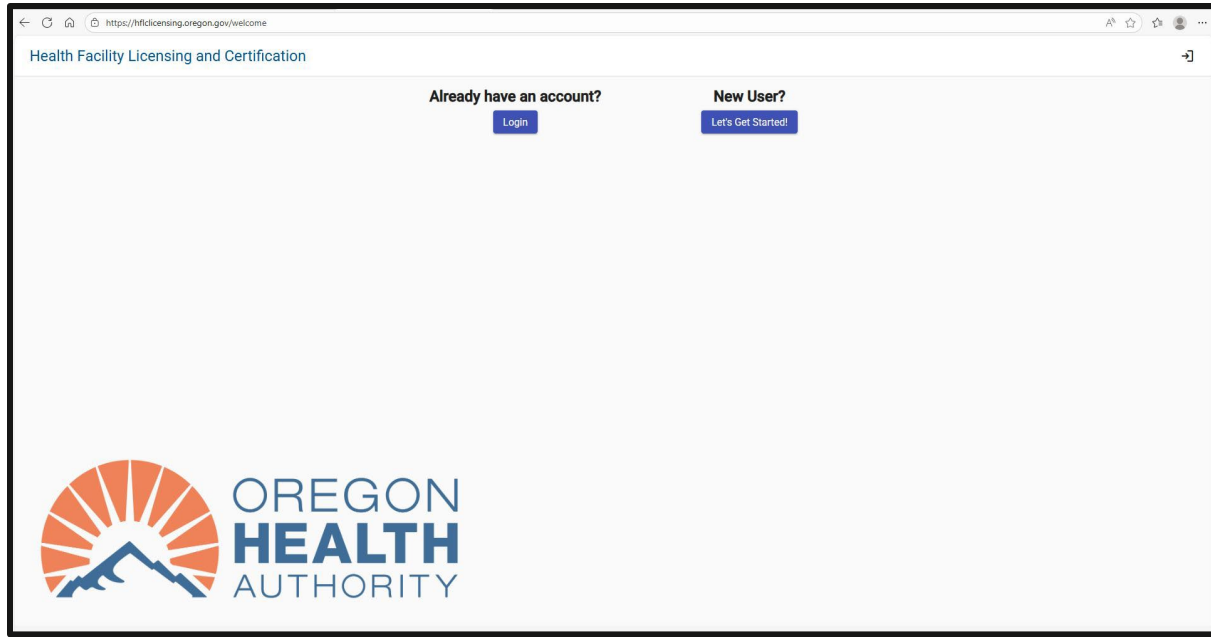
- Can a caregiver administer Narcan if instructed by 911?

Answer:

- Narcan = **medication administration**
- Must meet all requirements of **333-536-0075(3)**
- Agencies may request a **waiver** if Narcan administration is anticipated
- Waiver must include:
 - Training plan
 - Clear service plan documentation



IHC Online Licensure Portal



- <https://hflclicensing.oregon.gov>
- Used for renewals, changes, CHOWs, subunits
- First step: **Claim your license**
- Support: 971-673-0540 (Option 3)
- Email: mailbox.inhomecare@odhsoha.oregon.gov
- Guides: www.healthoregon.org/hflc

IHC Program Team

- Matt Gilman – IHC Program Manager
- Sanya Rusynyk – IHC Program Coordinator
- Lisa Finkle – IHC Client Care Surveyor
- Courtney Marshall** – IHC Client Care Surveyor
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Contact the team at:

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**Last name has changed from Rakach.