

ISDH Program Guidance Letter  
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**DATE:** June 1, 2005

**TO:** Administrators of Indiana Comprehensive and Residential Care Facilities

**SUBJECT:** Alzheimer's and dementia care annual training requirement for comprehensive and residential care facilities

#### **Letter Summary**

The three hour annual dementia specific training requirement will be based on a calendar year.

The three hour annual dementia-specific training requirement begins in the year following the employee's date of hire.

Upon the request of a current employee, former employee, or health facility, the ISDH requests that health facilities provide a copy of an employee's dementia specific training records.

#### **Purpose:**

The purpose of this memorandum is to provide Indiana comprehensive and residential care facilities with guidance relating to the implementation of the annual training requirement for the Alzheimer's and dementia care training rule. The issue concerns the health facility implementation and documentation of the three hour annual dementia specific training requirement.

## **Background:**

In 2004 the Indiana State Department of Health (ISDH) adopted a rule requiring Alzheimer's and dementia care training for all comprehensive and residential care staff having regular contact with residents. The rule [410 IAC 16.2-3.1-14(u) for comprehensive care and 410 IAC 16.2-5-1.4(e)(2) for residential care facilities] requires six hours of dementia specific training within six months of initial employment or within thirty days for personnel assigned to the Alzheimer's and dementia special care unit. The rule then requires three hours of training annually thereafter to meet the needs and preferences of cognitively impaired residents and to gain understanding of the current standards of care for residents with dementia.

The rule became effective August 22, 2004. In previous communications, the ISDH set November 22, 2004 as the implementation date for completion of initial training for staff working in an Alzheimer's and dementia special care unit. The ISDH set February 22, 2005 as the implementation date for completion of initial training of staff not working in a special care unit.

Since February 22, 2005, the ISDH has received numerous inquiries concerning the implementation of the three hour annual training requirement. A common question has been when the annual training cycle begins and ends – i.e. is it based on the hire date, the date of the initial training, the 30-day or six-month date, or calendar date. A second common question concerns the surveying of the dementia-specific training rule.

## **Policy and Procedure:**

The ISDH will survey facilities for compliance with the Alzheimer's and dementia care training rule using a calendar year training period. A facility must provide the initial dementia specific training within the required 30-day or six-month period from the hire date as specified in the rule. The three (3) hour annual trainings apply to and begin with the year following the hire date. The same training cycle applies to the training requirements for the special care unit director under 410 IAC 16.2-3.1-13(w) and 410 IAC 16.2-5-1.3(l).

Health facilities are required to maintain records of in-service trainings [410 IAC 16.2-3.1-14(o)(p)(q) and 410 IAC 16.2-5-1.4(e)(3) and (h)]. The health facility is therefore required to maintain documentation of dementia specific training. The goal of the dementia specific training requirement is to ensure that all employees receive training concerning care of residents with Alzheimer's or dementia. As much as possible, the ISDH hopes to eliminate unnecessary duplication of training. Upon the request of a current employee, former employee, or health facility, the ISDH requests that health facilities provide a copy of an employee's dementia specific training records. This will assist in promoting an efficient and effective system and assist all facilities in ensuring employee compliance with the rule requirements.

## **Discussion:**

### Training cycles

Several health facility administrators or directors of nursing requested that the ISDH adopt a simple and consistent standard for dementia specific training cycles. If the training cycle were to be based on the actual date of training or forever be based on the hire date, a health facility would potentially have a different training cycle for every employee. Many persons expressed a concern that maintaining individual training cycles for every employee would be unduly confusing and burdensome. The goal of the ISDH is to standardize and simplify the training cycle for annual dementia specific training. The use of a calendar year cycle appears to be the simplest solution. The following are examples of the cycle.

1. An employee was hired prior to the rule effective date of August 22, 2004. The employee does not work in a special care unit. The employee received the initial six-hour Alzheimer's and dementia care training on December 1, 2004. Based on a hire date of December 31, 2004 or before, the annual training requirement begins in 2005. The employee must receive three hours of Alzheimer's and dementia specific training between January 1, 2005 and December 31, 2005 and every calendar year thereafter.
2. An employee was hired prior to the rule effective date of August 22, 2004. The employee does not work in a special care unit. The employee received the initial six-hour Alzheimer's and dementia care training on February 10, 2005. Note that the training was provided within the six-month requirement proscribed in the rule. Based on a hire date of December 31, 2004 or before, the annual training requirement begins in 2005. In addition to the six-hour initial training provided on February 10, 2005, the employee must receive three hours of dementia specific training between January 1, 2005 and December 31, 2005 and every calendar year thereafter.
3. An employee is hired on January 2, 2005 and is assigned to the special care unit. The employee must receive the initial six hour Alzheimer's and dementia care training on or before February 1, 2005. Based on the hire date of January 2, 2005, the three hour annual training requirement begins in 2006. The employee must therefore receive three hours of Alzheimer's and dementia specific training between January 1, 2006 and December 31, 2006 and every calendar year thereafter.
4. An employee is hired on December 30, 2005. If the employee is assigned to the special care unit, the employee must receive the initial six hour Alzheimer's and dementia care training on or before January 28, 2006. If not assigned to the special care unit, the employee must receive training on or before June 29, 2006. Based on the hire date of December 30, 2005, the three hour annual training requirement begins in 2006. In addition to the initial six-hour training that will

likely occur in 2006, the employee must also receive three hours of Alzheimer's and dementia specific training between January 1, 2006 and December 31, 2006 and every calendar year thereafter.

### Survey procedures

Another question received by the ISDH concerns how the ISDH will survey for compliance with this rule. During a survey, the surveyors will review a sample of staff training records to determine compliance with the dementia specific training requirements. Health facilities are expected to have documentation of dementia specific training for each employee. Surveyors will review the documentation to ensure compliance with the rule. If questions arise as to the validity of the documentation, the surveyors may further investigate to determine whether the documentation is an accurate representation of the training received by an employee.

### Providing and accepting training

A facility should document training according to facility policy. For training provided by a health facility, the ISDH recommends that each employee be given a certificate of completion stating the date of training, title of training provided, the training instructor, and hours earned. A copy of the certificate should be maintained in the facility's records.

The ISDH appreciates that employees occasionally switch employers or work for multiple employers. The purpose of the rule is to ensure that health facility personnel have training in Alzheimer's and dementia care. The ISDH interprets this rule as to avoid unnecessary duplication of training and encourage training obtained from a variety of sources. To achieve that purpose, upon the request of a current employee, former employee, or health facility, the ISDH requests that health facilities provide a copy of an employee's dementia specific training records. A facility may, but is not required to, accept dementia specific training provided by other providers or organizations.

### **Action Required of a Health Facility:**

Health facilities must ensure that documentation of each employee's dementia specific training is contained in the health facility's records. The health facility must ensure that each employee has received the dementia specific annual training within a calendar year.

### **Effective Date:**

The information containing in this memorandum clarifies current policy and is implemented upon distribution.

**Training:**

The information contained in this announcement should be shared with health facility administrators, directors of nursing, directors of special care units, and corporate compliance officers.

For questions concerning this program letter, please contact the ISDH Director of Long Term Care, Sue Hornstein, at 317-233-7289 or [shornste@isdh.state.in.us](mailto:shornste@isdh.state.in.us); or ISDH Public Health Nurse Surveyor, Debbie Beers, at 317-233-7067 or [dbeers@isdh.state.in.us](mailto:dbeers@isdh.state.in.us).

Cordially,

/s/

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