



Health Care Regulation & Quality Improvement

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To: Oregon In-Home Care Agencies

From: Health Care Regulation and Quality Improvement
In-Home Care Agency Program

RE: **In-Home Care Agency orientation, training and competency evaluation**

The purpose of this memo is to provide clarification related to the difference between orientation and training and competency evaluation. Based on survey findings and questions from agencies it is evident there is some misunderstanding about those terms and processes as they are often used interchangeably.

Briefly, as used in the Oregon Administrative Rules (OARs) for in-home care agencies the following terms mean:

1. Orientation - an agency-specific process during which a new employee is introduced to the way a particular agency conducts business;
2. Training - a process of teaching an individual about certain subjects or to perform certain tasks for which there are accepted standards, procedures and practices;
3. Competency evaluation - a process of evaluating an individual's knowledge about certain subjects and their ability to perform certain tasks appropriately and safely.

Orientation

OAR 333-536-0070(3), Caregiver Qualifications and Requirements, requires that "Caregivers shall complete an agency-specific orientation, conducted by the agency administrator or designee, before independently providing services to clients."

The "orientation" referred to must include, as applicable, the topics listed at OAR 333-536-0070(3)(a)(A) through (K). The completion of orientation must be documented as required in (3)(b) of that rule.

"Orientation" as used in these rules, is a usual and common practice for new employees in any business or company. It refers to the process of informing, introducing, and teaching new employees about the business or company. It is designed to acquaint new employees to how that specific business or company

operates and conducts its business. It is the process during which the employer communicates to new employees its policies and procedures and systems.

The OARs require that orientation include certain subject areas, but orientation must be agency-specific and will vary from agency to agency as each agency has its own ways of doing business. Orientation cannot be substituted for required training.

Caregiver training and competency evaluation

OAR 333-536-0070(4), Caregiver Qualifications and Requirements, requires that “Caregivers shall complete appropriate training and must have their competency evaluated and documented by the administrator or designee before independently providing services to clients.”

The “training” referred to must include, as applicable, the topics listed at OAR 333-536-0070(4)(a)(A) through (L). The completion of training must be documented as required in (4)(b) of that rule.

The other language in that rule requires that the agency evaluate whether the caregiver is competent to provide services independently. This process is referred to as competency evaluation and must be completed for each caregiver. Competency can be evaluated using written testing, documented verbal testing, and observation/return demonstration, and is commonly achieved using a combination of those. Each agency must determine how it will conduct and document competency evaluation for each caregiver and that must be specified in written policies and procedures.

Non-injectable medication training and competency evaluation

OAR 333-536-0075(10), Medication Services, requires that “Agency caregivers assigned to provide medication services must be given basic non-injectable medication training before providing the services. The medication training must include successful return demonstrations of non-injectable medications tasks by the caregivers.” In addition, (10)(b) of that rule requires “Prior to providing medication services, caregivers shall demonstrate appropriate and safe techniques in the provision of medication tasks described in this rule.”

The medication “training” referred to must include, as applicable, the topics listed at OAR 333-536-0075(10)(a)(A) through (H). The completion of training must be documented as required in (10)(c) of that rule.

The other language in that rule requires that the agency evaluate whether the caregiver is competent to provide medication services before providing the services. In the case of medication services, the rule requires that observation/return

demonstration must be used to evaluate competency in the tasks described in the rule. An agency may also use written and documented verbal testing, but not for replacing observation/return demonstration of the required tasks. Documentation of competency evaluation must be, at a minimum, in accordance with the applicable parts of OAR 333-536-0075(10)(c). Each agency must ensure it complies with these requirements by developing and implementing specific written policies and procedures.

Additional comments

Written testing completed in conjunction with training, such as for on-line training, may be considered part of competency evaluation but does not fully satisfy the competency evaluation requirements. Written or documented verbal testing may not be substituted for return demonstration when return demonstration is required.

Other references to orientation, training, and competency evaluation may be found at:

OAR 333-536-0050(8)(e), (8)(g), and (9)(e), Organization, Administration, and Personnel

OAR 333-536-0070(4)(e) and (4)(f), Caregiver Qualifications and Requirements