

# Facility Assessment: Training Program Evaluation

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## Facility Assessment: Training Program Evaluation

### Reference F Tags

#### F725 and F726

**§483.35, 483.35(a), and 483.35(c)** Sufficient and Competent Staff

#### F741

**§483.40(a)** Sufficient Number of staff with appropriate competencies

#### F838

**§483.70(e)** Facility assessment interpretive guidance

The assessment must **include or address an evaluation of the facility's training program** to ensure any training needs are met for all new and existing staff, individuals providing services under a contractual arrangement, and volunteers, consistent with their expected roles. The assessment should also include an evaluation of what policies and procedures may be required in the provision of care and that these meet current professional standards of practice. If there are any concerns regarding training refer to §483.95 Training.

#### F940

**§483.95** Training Requirements

A facility must develop, implement, and maintain an effective training program for all new and existing staff; individuals providing services under a contractual arrangement; and volunteers, consistent with their expected roles. A facility must determine the amount and types of training necessary based on a facility assessment as specified at § 483.70(e). Training topics must include but are not limited to— [§483.95 will be implemented beginning November 28, 2019 (Phase 3)]

#### F943 Training

**§483.95(c) and §483.95(c)(1-2)** Abuse, neglect, and exploitation.

**§483.95(c)(3)** dementia management and abuse prevention

Staff includes for the purposes of the training guidance, all facility staff, (direct and indirect care and auxiliary functions) contractors, and volunteers.

#### **GUIDANCE §483.95(c)**

All facilities must develop, implement and permanently maintain an effective training program for all staff, which includes, at a minimum, training on abuse, neglect,

exploitation, misappropriation of resident property, and dementia management, that is appropriate and effective, as determined by staff need and the facility assessment (as specified at §483.70(e)).

Changes to the facility's resident population, staff turnover, the facility's physical environment, and modifications to the facility assessment may necessitate ongoing revisions to the facility's training program.

There are a variety of methods that could be used to provide training. For example, staff training may be facilitated through any combination of in-person instruction, webinars and/or supervised practical training hours.

Supervised practical training means training in a setting in which instruction and oversight are provided by a person who has relevant education and/or experience specific to the subject of the training being provided.

All training should support current scope and standards of practice through curricula which detail learning objectives, performance standards and evaluation criteria, and addresses potential risks to residents, staff and volunteers if procedures are not followed. There should be a process in place to track staff participation in the required trainings.

#### **F947**

**§483.95(g)** Required in-service training for nurse aides.

**§483.95(g)(3)** Address areas of weakness as determined in nurse aides' performance reviews and facility assessment at § 483.70(e) and may address the special needs of residents as determined by the facility staff.

#### **GUIDANCE §483.95(g)**

All facilities must develop, implement and permanently maintain an in-service training program for nurse aides that is appropriate and effective, as determined by nurse aide evaluation or the facility assessment as specified at §483.70(e). Changes to the facility's resident population, the facility's physical environment, staff turnover, and modifications to the facility assessment may necessitate ongoing revisions to the facility's training program.

There are a variety of methods that could be used to provide training. For example, nurse aide training may be facilitated through any combination of in-person instruction, webinars and/or supervised practical training hours. Supervised practical training means training in a setting in which instruction and oversight are provided by a person who has relevant education and/or experience specific to the subject of the training being provided.

All training should support current scope and standards of practice through curricula which detail learning objectives, performance standards and evaluation criteria, and addresses potential risks to residents, staff and volunteers if procedures are not followed. There should be a process in place to track nurse aide participation in the required trainings.

The adequacy of the in-service education program may be measured not only by documentation of hours of completed in-service education, but also by demonstrated competencies of nurse aide staff through written exam and/or in consistently applying the interventions necessary to meet residents' needs as identified in the facility assessment. Observations of nurse aides that indicate deficiencies in their nurse aide skills may be the result of an inadequate training program and/or inadequate performance review ...

## **INTENT OF THE TRAINING PROGRAM EVALUATION SECTION**

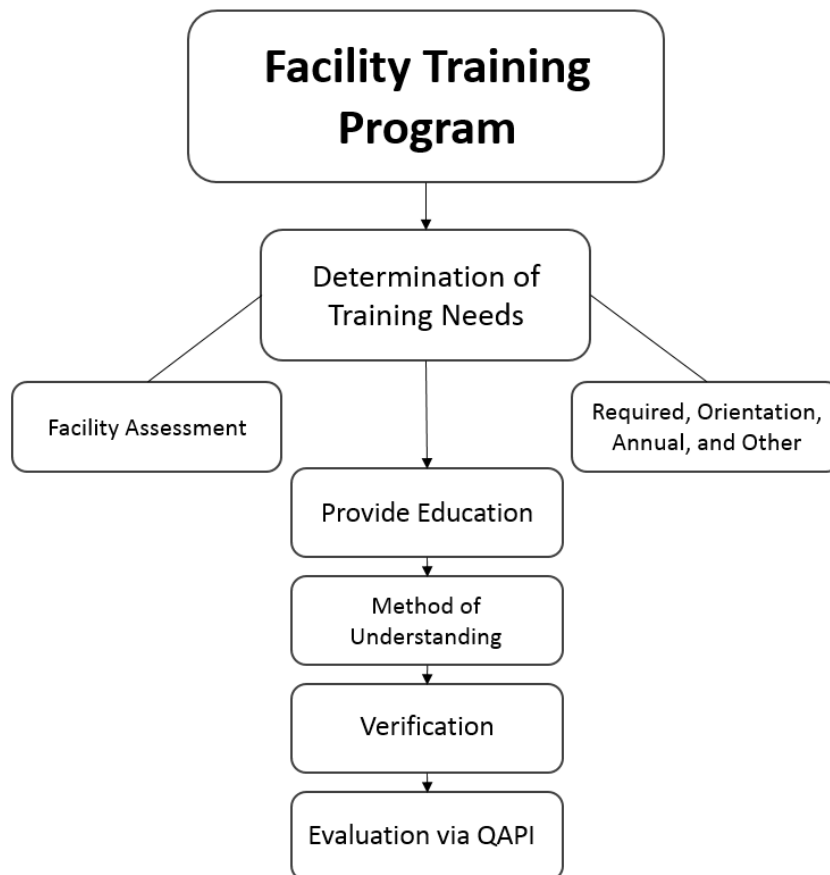
The facility training program must include trainings provided for competencies and skills that correlate with the resident needs identified in the facility assessment. An evaluation of the training program needs to be conducted per the requirements. The overall intent of conducting an evaluation of a facility training program is to determine the effectiveness of the facility training programs and how the facility is meeting its' objectives per the facility assessment. The evaluation is a process by which a facility can observe what they and others are doing and learn how to improve these activities when necessary.

There are numerous methods that providers may use to evaluate the progress of individual trainings as well as the overall outcomes of their facility training program. The intent of evaluating the training program can be conducted in two phases:

1. At different stages whether daily, weekly or monthly after a specific training, which may include evaluating the individual's response to training or the effectiveness or the training/trainer as deemed applicable and/or;
2. Evaluation of the facility's overall training program annually or as needed based upon performance outcomes which correlate with the facility assessment.

## TRAINING PROGRAM EVALUATION PROCESS

Evaluating a training program is a means for a facility to gather information that can be reviewed and interpreted to make decisions regarding learning and development that aligns with standards of practice, professional scope of practice, requirements, staff knowledge and competencies and correlation with the facility assessment. The following depicts a process to evaluate a facility training program utilizing the facility Quality Assurance and Performance Improvement process.



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### 1. Determination of Training Needs

- a. The facility will incorporate the required training components into their orientation program, annual training plan, professional/certification requirements, facility assessment findings, as well as other clinical and operational needs.



- b. Specific elements and criteria in a facility training plan should include, but not limited to:
  - i. Evidenced based practice
  - ii. Standards of practice
  - iii. Regulatory requirements (federal, state, and local)
  - iv. Scope of practice
  - v. Specialty program requirements
  - vi. Facility policies and procedures
  - vii. Facility expectations
  - viii. Facility assessment results
  - ix. Staff learning needs and competencies
  - x. Past training needs
  - xi. Other areas determined by operational, clinical, and organization needs
- c. Additional determination of training needs includes any identified areas of deficit or opportunities for improvement based upon quality assurance and performance improvement findings

## 2. Provide Education

- a. Development of specific training/education programs should provide evidence of learning needs and overall objectives. Specific components may include, but are not limited to:
  - i. Training description or summary of educational content
  - ii. Learning objectives
  - iii. Methodology – Method of instruction such as:
    - 1. Lecture
    - 2. Demonstration
    - 3. Protocol or procedure review
    - 4. Self-Learning package
    - 5. On-line
    - 6. Skills Fair
    - 7. Simulation
    - 8. Clinical practice
    - 9. Other
  - iv. Handouts
  - v. Method of understanding to demonstrate learner knowledge post training

3. Method of Understanding

- a. There are numerous methods to determine a learner's understanding of the training program, such as:
  1. Written post-test
  2. Oral post-test
  3. Return demonstration
  4. Skills check/competency check
  5. Verbal review
  6. Observation of performance
  7. Sign in sheets verbalizing the understanding of the material
  8. Other
- b. There are many methods to assess knowledge and performance and a facility may choose one or a combination of methods based upon the learning objectives and process needs.
- c. It is important to discuss observations and evaluations with the learner. Feedback assists the learner to see their progress and how they can improve. Acknowledge and give support for good results, and provide recommendations for improvement or individualized training to achieve the expected outcomes.

4. Verification or Evaluation

- a. Upon the completion of individual training programs, the facility is responsible for the adherence to the training objectives – training into facility practice. There are various methods that a facility may choose to verify and validate the training objectives and facility practice, including:
  - i. Observation – care and practice
  - ii. Walking rounds
  - iii. Interviews
  - iv. Medical record review
  - v. Verbal review
  - vi. Monitoring audits
  - vii. Annual performance evaluation
- b. Document results

5. Evaluation via Quality Assurance and Performance Improvement process

- a. Review verification results via the QAPI process which provides the facility the opportunity to analyze and interpret data (findings) to assess performance and support improvement initiatives.

- i. From the identified opportunities for improvement, the facility will systematically and objectively prioritize the opportunities in order to determine the necessary action steps. This process takes into consideration input from multiple disciplines, facility assessment findings, residents and families.
- b. The facility will document its overall evaluation of individual training programs, and the overall facility training program per QAPI protocols.
  - i. This can be accomplished by adding the training evaluation overview and results into the QAPI Committee Meeting Minutes. This can serve as verification of your evaluation process.

## HOW TO INCORPORATE INTO THE FACILITY ASSESSMENT

Per **§483.70(e)**, the facility assessment must include or address an evaluation of the facility's training program to ensure any training needs are met for all new and existing staff, individuals providing services under a contractual arrangement, and volunteers, consistent with their expected roles. Therefore, it is important to:

- Gather the outcomes data related to facility training programs reports as described above.
- Use the information to answer the questions:
  - Does the facility have a process to identify gaps and provide targeted training for staff to meet the resident population needs as identified in the facility assessment?
  - Has the facility outlined what education is needed based upon the resident population?
  - Does the facility conduct the verification/evaluation process of training programs, reporting results per the QAPI process?
  - Are there any training, education and/or competency needs based on resident data, staff knowledge data, or trends identified in the Facility Assessment?
  - Does our current direct care training program correlate with resident population based upon the Facility Assessment?
- Incorporate your processes into your QAPI plan
- Monitor the facility assessment annually or upon a change in the facility's operation that would require a substantial modification in the assessment and adjust the facility training plan accordingly.
- Write a narrative description of the facility's training evaluation process for inclusion, see below, into the narrative Facility Assessment. See the Facility Assessment Template

**See the Facility Assessment Template SAMPLE related to the inclusion of the necessary information obtained via this process for the completion of the Facility Assessment.**





## References

**State Operations Manual (SOM) Appendix PP for Phase 2, F-Tag Revisions, and Related Issues**

[www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Downloads/Advance-Appendix-PP-Including-Phase-2-.pdf](http://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Downloads/Advance-Appendix-PP-Including-Phase-2-.pdf)

**Quality Improvement Organizations, Facility Assessment Tool (2017)** <http://qioprogram.org/facility-assessment-tool>

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*Sample*

## Individual Training Program Evaluation Summary

|   |  |                          |
|---|--|--------------------------|
| <b>Education Topic</b>  | <b>Method of Teaching</b>  | <b>Date of Education</b> |
|   |  |                          |
| <b>Instructor</b>   | <b>Teaching Methodology</b> (Circle One)   |                          |
|   | Lecture   Demonstration   Protocol or procedure review<br>Self-Directed   On-line   Skills Fair   Simulation<br>Clinical practice   Other:   |                          |
| <b>Course Description</b>   |  |                          |
|   |  |                          |
| <b>Objectives</b>   |  |                          |
|   |  |                          |
| <b>Handouts – Attached</b>  |  |                          |
| <b>Method of Understanding</b>  | <b>Verification or Evaluation Conducted</b>  |                          |
| <input type="checkbox"/> Written post-test<br><input type="checkbox"/> Oral post-test<br><input type="checkbox"/> Return demonstration<br><input type="checkbox"/> Skills check/competency check<br><input type="checkbox"/> Verbal review<br><input type="checkbox"/> Sign in sheets verbalizing the understanding of the material<br><input type="checkbox"/> Other | <i>Utilize applicable monitoring data collect method</i><br><input type="checkbox"/> Observation – care and practice<br><input type="checkbox"/> Walking rounds<br><input type="checkbox"/> Interviews<br><input type="checkbox"/> Medical record review<br><input type="checkbox"/> Verbal review<br><input type="checkbox"/> Monitoring audits<br><input type="checkbox"/> Other |                          |

### Evaluation Results:

- ☐ Analysis conducted to determine trend and potential performance improvement needs
- ☐ Correlate training evaluation findings with Facility Assessment
- ☐ Included in QAPI process

\_\_\_\_\_  
**Evaluator**

\_\_\_\_\_  
**Date Completed**