

May 22, 2023

Medical Services Board
Colorado Department of Health Care Policy & Financing
1570 Grant Street
Denver, CO 80203
Delivered to: Chris Sykes at chris.sykes@state.co.us

RE: Rule Number: MSB 23-03-14-B

Medical Services Board members,

The **Alzheimer's Association of Colorado strongly supports the dementia training requirements outlined in Rule #MSB 23-03-14-B**, Revision to the Medical Assistance Rule concerning Adult Day Services Dementia Training, Section 8.491. **We urge the Board to adopt this proposed rule** to ensure the safety, health and well-being of Coloradans living with Alzheimer's disease and related dementias who rely on adult day services.

What Is Dementia?

Dementia is a general term for loss of memory, language, problem-solving, judgement and other cognitive abilities severe enough to interfere with daily life. It can also cause personality and behavioral changes. The term *Alzheimer's disease and related dementias* is often used to encompass all forms of dementia. However, the term *dementia* is also used in this way. Alzheimer's disease accounts for 60-80% of dementia cases.

Who Lives With Dementia?

The vast majority of people living with dementia are 65 years of age or older. Age is the greatest risk factor, and a person's risk of having it increases with age. A small number of people with dementia start experiencing symptoms as early as in their 30s or 40s. These individuals have *younger-onset dementia*. Almost two-thirds of Americans with dementia are women. Dementia does not impact all people equally. Black and Hispanic Americans are disproportionately more likely than White Americans to have dementia. Blacks are twice as likely, and Hispanics are 1.5 times as likely to experience it.

Why Is Dementia Training Important?

Dementia training is a critical component of our state's direct care workforce because:

1. The number of Coloradans living with dementia is rising rapidly,
2. Individuals living with dementia rely on direct care staff more often,
3. Dementia training strengthens the direct care workforce, and
4. Dementia training helps improve quality of care.

1) The Number of Coloradans Living with Dementia is Rising Rapidly

In 2020, an estimated 76,000 Coloradans were living with Alzheimer's disease, and that number is set to rise by more than 21% by 2025.¹ Our direct care workforce must be prepared to meet the challenges of this unique population. Appropriate training is a fundamental part of ensuring that preparedness.

2) Individuals Living with Dementia Rely on Direct Care Staff More Often

As dementia progresses, individuals living with it increasingly rely on direct care staff to help them with activities of daily living as well as for their basic health, safety and welfare. Direct care staff in particular settings are more likely to encounter people with dementia. Nationally, dementia is the third most common chronic condition in participants using adult day services, and 28% of individuals using adult day services have dementia.ⁱⁱ

3) Dementia Training Strengthens the Direct Care Workforce

Dementia training can better prepare direct care staff for the responsibilities of these jobs, which could help strengthen our state's direct care workforce. In a recent Colorado Health Institute report, inadequate training was cited as "a driving force of turnover" for direct care staff. The report also states thatⁱⁱⁱ:

- "Staff turnover presents a major challenge to direct care employers across the country."
- "[N]ationally, 40-60% of direct care [staff] turn over during the course of a year."
- "Recruitment and training can be costly and time consuming".
- Employers may rely on existing staff to fill employment gaps, and this can require employers to pay overtime rates and increase the likelihood of staff burnout.
- "Research has shown that staff turnover and lower staffing levels are associated with worse quality of care."

A number of factors contribute to this workforce gap in addition to adequate training, including low wages, limited workplace benefits, unmet childcare needs and lack of career opportunities, among others. However, training has the dual benefit of supporting direct care staff and increasing the quality of care provided to the residents or center participants they care for, including those living with dementia.

It is also important that all direct care staff are dementia-trained. Consider a situation where only select staff members in an adult day center are dementia-trained. The responsibility of caring for individuals living with dementia may be shifted onto those staff members. This can result in more stress, anxiety and frustration for those staff members, and it could eventually contribute to burnout and staff turnover. If all direct care staff are dementia-trained, it eliminates the need to have only certain staff care for these typically high-needs individuals.

4) Dementia Training Helps Improve Quality of Care

The single most important determinant of quality dementia care across all care settings is direct care staff.^{iv} These staff members help to shape the daily lives of individuals with living with dementia and assist with all aspects of their physical care. That assistance also supports those individuals' emotional and mental health and general well-being. Through their close interactions, direct care staff gain an in-depth knowledge of the individual, including their preferences, behaviors and functioning. For the wellbeing of people living with dementia, this is a critical component of quality dementia care.^v


Each person experiences the symptoms and progression of dementia differently, and this progression is not always linear or predictable. Thus, for these individuals, a one-size-fits-all approach to address their day-to-day needs does not always reflect their individual values, needs or current abilities. A basic understanding of the disease, dementia care best practices, a person-centered care approach, and other dementia-related knowledge, gives direct care staff the flexibility to appropriately assess and adjust the level of care provided as the disease progresses. Training direct care staff on these items improves the lives of individuals living with dementia by:

- Teaching the professional to validate the identity of the individual beyond the scope of their diagnosis,
- Allowing the professional to practice patience and compassion throughout the individual's disease progression,
- Instructing the professional how to maximize the independence of the individual for as long as possible,
- Facilitating the ability for the professional to create meaningful and engaging opportunities for individuals based on their personal preferences and abilities, and

- Empowering staff to communicate best practices to individuals and their families, which allows them to make the best decisions for their disease journey.

Coloradans living with Alzheimer’s and related dementias are some of our most vulnerable loved ones and neighbors. The dementia training requirements outlined in this proposed rule will help ensure they are cared for appropriately when they seek adult day services.

Sincerely,



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ⁱ [2023 Alzheimer’s Disease Facts and Figures](#). Alzheimer’s Association. 2023. Page 24.

ⁱⁱ [2023 Alzheimer’s Disease Facts and Figures](#). Alzheimer’s Association. 2023. Page 71.

ⁱⁱⁱ [Closing the Care Gap: Opportunities for Employers to Support and Grow Colorado’s Direct Care Workforce](#). Colorado Health Institute. June 2020. Page 12.

^{iv} [Alzheimer’s Association Dementia Care Practice Recommendations](#). 2018. Page S104.

^v [A Guide to Quality Care from the Perspectives of People Living with Dementia](#). Alzheimer’s Association. 2018.