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Office of Health Care Quality (OHCQ)

Policy on the Vendor Approval Process for the 80-Hour Assisted Living Manager (ALM) Training Course November 1, 2025

Table of Contents

1.0	Purpose
2.0	Regulatory Authority
3.0	New Vendor Application Process & Approval/Denials
4.0	Required Content for Curriculum and Training Materials
5.0	Requirements for Re-certification
6.0	Investigations of Complaints
	Attachments

1.0 Purpose

The policy on the Vendor Approval Process for the 80-Hour Assisted Living Manager (ALM) Training Course outlines the application and re-certification process for vendors of both the 80-hour and the 20-hour ALM training courses. The policy outlines OHCQ and vendor roles and responsibilities and details the standardized process for curriculum approval and denials based on [COMAR 10.07.14.16](#) and [COMAR 10.07.14.17](#), and [COMAR 10.07.14.15](#). This policy also covers complaint oversight.

Background: OHCQ is the agency within the Maryland Department of Health (MDH) that determines compliance and non-compliance with state licensure and/or federal certification requirements in health care facilities and community-based programs in 47 industries. On behalf of the Maryland Secretary of Health, OHCQ issues state licenses that authorize the operation of certain health care facilities or programs in Maryland, such as assisted living programs. The state licensure requirements establish the minimum health and safety requirements to obtain and maintain a license to operate in Maryland.

The assisted living unit is responsible for the oversight of all assisted living programs in Maryland, including those that participate in the Medicaid waiver program. The unit completes surveys for prelicensure, licensure, inspection of care, change of ownership, change of the level of care, follow-up, and surveys to investigate complaints and facility-reported incidents.

The vendor approval process to teach the 80 hour Assisted Living Manager training course and the 20 hours of continuing education are a critical component of quality oversight of the assisted living program. ALM Training vendors serve as experts in COMAR 10.07.14 and they are responsible for compliance with [COMAR 10.07.14.16](#) and [COMAR 10.07.14.17](#) and making sure that the ALM course attendees fully understand the breadth and scope of their role as outlined in [COMAR 10.07.14.15C](#). *Duties. The assisted living manager shall: (1) Be on-site or available on call; and (2) Have overall responsibility for: (a) The management of the assisted living program, including recruiting, hiring, training, and supervising all staff ... (b) The development and implementation of a staffing plan ... (c) The development and implementation of all policies, programs, and services as required by this chapter...*

It is through licensure and certification activities that OHCQ fulfills its mission to protect the health and safety of Marylanders and to ensure that there is public confidence in the health care and community delivery systems.

2.0 Regulatory Authority

State authority for this program is contained in [Md. Code Ann., Health General § 19-1807](#), Annotated Code of Maryland.

(a) (1) Except as provided in subsection (d) of this section, an assisted living manager who is employed by an assisted living program shall have completed a manager training course that is approved by the Department and includes an examination.

(2) The manager training course shall:

(i) Consist of at least 80 hours; and

(ii) Provide the training through in-person courses, virtual training methods, or a combination of both.

(b) An assisted living manager employed by a program shall be required to complete 20 hours of Department-approved continuing education every 2 years.

(c) In addition to the sanctions specified in COMAR 10.07.14.48, an assisted living program that fails to employ an assisted living manager who meets the requirements of this section may be subject to a civil money penalty not to exceed \$10,000.

(d) (1) The requirements of subsection (a) of this section do not apply to an individual who:

(i) Is employed by an assisted living program and has enrolled in a Department-approved manager training course that the individual expects to complete within 6 months;

(ii) Is temporarily serving as an assisted living manager under § 9-3A-01 of the Health Occupations Article due to an assisted living manager leaving employment and prior to the hiring of a permanent assisted living manager; or

(iii) Subject to paragraph (2) of this subsection:

1. Has been employed as an assisted living manager in the State for 1 year prior to January 1, 2006; or

2. Is licensed as a nursing home administrator in the State.

(2) The Department may require an individual who is exempt under paragraph (1)(iii) of this subsection to complete a manager training course and examination if the

Department finds that the assisted living manager repeatedly has violated State law or regulations on assisted living and that those violations have caused actual physical or emotional harm to a resident.

(e) The Department shall ensure that manager training courses approved by the Department are affordable and accessible to assisted living programs and to individuals seeking to enroll in the courses.

Code of Maryland Regulations

This policy is based on [COMAR 10.07.14.15](#), [COMAR 10.07.14.16](#), and [COMAR 10.07.14.17](#).

A vendor may not advertise, promote, or enroll students in an 80-hour ALM training course without obtaining prior approval of the Department.

Per Md. Code Ann., Health - General, § 19-1807 and [COMAR 10.07.14.16](#), ALMs are required to take the 80-hour ALM training course regardless of the size of the facility. This requirement must be completed by June 30, 2026 (per HB874 from the 2024 Maryland General Assembly Legislative Session).

Under Health-General § 19-1807(d)(1)(iii)(1), the requirement for the 80-hour ALM course does not apply to an individual who “[h]as been employed as an assisted living manager in the State for 1 year prior to January 1, 2006.” This means that the individual’s employment as an ALM would have had to start on or before January 1, 2005. This same language is reiterated in [COMAR 10.07.14.16E\(3\)](#). All ALMs who have not been employed as an ALM for 1 year prior to January 1, 2006 must take the ALM 80-hour course by June 30, 2026.

Please know that OHCQ may require an individual exempt under paragraph Health-General § 19-1807(d)(1)(iii) to complete a manager training course and examination if OHCQ “finds that the assisted living manager repeatedly has violated State law or regulations on assisted living and that those violations have caused actual physical or emotional harm to a resident.” See Health-General § 19-1807(d)(2).

3.0 New Vendor Application Process

1. A vendor seeking to offer the 80 hour Assisted Living Manager (ALM) training course must submit the proposed curriculum, and training materials using the links provided [on OHCQ’s website](#). Applications are accepted online only and throughout the year. The initial review of submitted curriculum, training materials, final exam and answer key generally takes about one month for completion.
2. OHCQ will maintain an electronic database of all letters generated (denials/approvals), all curriculum and training materials submitted with the application, and notes of verbal communication.

3. Vendor applicants are required to provide an email address, phone number, and website (if applicable) with the initial application. Approved vendors are also required to keep current information on file with OHCQ at all times.
4. Paper applications are not accepted.
5. For tracking purposes, vendor applicants are asked to submit curriculum and training materials using the electronic form provided in one batch and not separate multiple emails. Information that is missing from the initial submission may be added at a later date; however, the vendor shall be made aware that this will cause a delay of the review.
6. Applications that remain incomplete and in the pending status for 180 days post submission with no activity can be administratively closed and the applicant can reapply.
7. Vendor applicants may request an informal 1:1 conference call with OHCQ to obtain technical assistance with their application. A maximum of two virtual technical assistance meetings are permitted with each applicant.
8. OHCQ staff (reviewer) uses the ALM Training Vendor - Reviewer Checklist Guide (Attachment #1) to complete a standardized evaluation of each applicant's curriculum and training materials.
 - a. When evaluating the vendor's material, the reviewer shall check the "Met" or "Not Met" column for every curriculum item that is listed in the left column. If a topic is inadequately developed, the reviewer will check the "Not Met" column and will use this guide when providing feedback to the applicant.
9. **Approvals:** OHCQ will email the vendor applicant an official approval letter following OHCQ's review of submitted curriculum and training materials.
 - a. Vendors that are approved to teach the 80-hour ALM course are also approved to teach the 20 hour ALM refresher course.
 - b. Vendors approved to teach the 80-hour ALM training course and the 20-hours of continuing education are automatically added to OHCQ's public facing webpage. ALMs seeking certification are [directed to this website](#).
 - c. Posting of Approval Letter: Approved vendors must prominently display their approval letter at their place of business (classroom and/or website).
10. **Denials:** OHCQ will email the vendor applicant an official denial letter following OHCQ's review of curriculum and training materials that are insufficient.
 - a. The denial letter will provide details of the gaps in the vendor's curriculum and/or training materials that must be corrected prior to resubmission.
 - b. Vendor applicants are allowed two attempts to resubmit revised course materials, following receipt of OHCQ's initial feedback letter.
 - c. After the third unsatisfactory review of the course materials, the application will be denied. OHCQ reserves the right to deny an application at its discretion. Vendors can reapply.
 - d. There is no appeal process for denied applications.

4.0 Required Content for Curriculum and Training Materials

1. Vendor applicants must submit: 1) summary curriculum, 2) training materials, and 3) an exam and answer key. The summary curriculum must cover [COMAR 10.07.14.17](#), which consists of 13 specific content areas with a corresponding breakout of time from the 80-hours allotted. Vendor applicants must submit their own training materials (often a powerpoint) and must clearly state by cross reference other relevant sections of COMAR 10.07.14. For example, training content will need to cover important regulations explained in .13 Administration, .15 Assisted Living Manger, and .22 Preadmission, among others. Please refer to the ALM 80-hour Training Curriculum Review Tool Checklist attachment #1 as a guide.
2. Approved vendors shall teach to the current regulations to best prepare ALMs. Vendors are responsible for obtaining a copy of the current assisted living regulations and are required to utilize relevant sections of the regulations in their training course. To get a copy of the regulations, contact Tarshia Neal at the Maryland Division of State Documents at (410) 260-3874 or tarshia.neal@maryland.gov. Regulations are also available at public libraries.
3. Vendors are encouraged to include content on OHCQ's [Assisted Living Program website](#) which includes important forms, transmittals and provider resources that are periodically updated.
4. Vendor course content must consist of at least 80 hours and can be provided through in-person courses, virtual training methods, or a combination of both.
5. Approved vendors are responsible for administering an examination at the conclusion of the course and issuing a certificate of completion to course participants.

5.0 Requirements for Re-certification

1. Approved vendors that make substantive changes to their curriculum must resubmit the revised materials to OHCQ for approval within 30 days of making the change.
2. OHCQ reserves the right to require periodic resubmission of updated training materials, based on future revisions to COMAR 10.07.14.
3. Approved vendors are required to keep current contact information on file with OHCQ at all times.

6.0 Investigations of Complaints

1. OHCQ shall be responsible for complaint investigations of approved vendors for the ALM 80-hour and 20-hour courses to determine compliance with the requirements of [COMAR 10.07.14.16](#) and [COMAR 10.07.14.17](#).
2. OHCQ may conduct announced or unannounced investigations.

For more information, contact OHCQ.ALRegs@maryland.gov

Attachment #1: ALM 80-hour Training Curriculum Review Tool



ALM Training Vendor – Reviewer Checklist Worksheet

Attachment #1

COMAR .17 Eighty Hour Course	Curriculum Must Cover these Related Sections of COMAR	Final/Approved
COMAR 10.07.14.16 ... (refer to detail in .16) A. All ALMs shall complete an 80-hour manager training course that is approved by MDH. B. (2) Provide the training through in-person courses, virtual training methods, or a combination of both.		<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(1) A. The ALM's training shall include the following courses: (1) Philosophy of assisted living, 2 hours, including ... (refer to detail in .17 A (1))	.37 Abuse, Neglect, & Financial Exploitation .04 License Required .06 Restrictions.	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(2) (2) Aging process and its impact, 4 hours, including ... (refer to detail in .17A (2))		<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(3) (3) Assessment and level of care waiver, 6 hrs, including... (refer to detail in .17 (3))	.24 Resident-specific Level of Care Waiver .05 Levels of Care .09 Licensure Standards Waiver	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(4) (4) Service planning, 6 hours, including... (refer to detail in .17A (4))	.28 Service Plan .29 Resident Record .30 Services	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(5) (5) Clinical management, 20 hours, including... (refer to detail in .17A (5))	.21 Delegating Nurse .31 Medication Management .14 Staffing Plan .33 Incident Reports	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(5)(n)	New infection prevention language added	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(5)(r) and (s)	New basic life support language added	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(6) (6) Admission and discharge criteria, 4 hours, including... (refer to detail in .17 A (6))	.34 Relocation & Discharge .22 Preadmission .23 Admission Requirements .26 Resident Agreement .36 Resident Rights .35 Resident Representative .27 Res Agreement Fin Content .40 Misuse of Resident's Funds	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(7) (7) Nutrition and food safety, 8 hours, including... (refer to detail in .17 A (7))	.30 Services	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(8)(a) (8) Dementia, mental health, and behavior management, 12 hours, including...	.32 Alzheimer's Special Care Unit	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(9) (9) End of life care, 4 hours, including...	.38 Restraints .41 Approval of Burial Arrangements	<input type="checkbox"/> Yes <input type="checkbox"/> No
	New MOLST language added	
COMAR 10.07.14.17A(10) (10) Management and operation, 4 hours, including... (refer to detail in .17 A (10))	.07 Licensing Procedures .08 Operating license .33 Incident Reports .61 Criminal Penalties	<input type="checkbox"/> Yes <input type="checkbox"/> No



ALM Training Vendor – Reviewer Checklist Worksheet

COMAR .17 Eighty Hour Course	Curriculum Must Cover these Related Sections of COMAR	Final/Approved
COMAR 10.07.14.17A(10)(a) (a) Role of the assisted living manager;	.15 Assisted Living Manager .13 Administration .08 Changes that Affect Operating License .64 Revocation of License	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(10)(e) (e) Hiring and training staff;	.19 Other Staff Qualifications .14 Staffing Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(10)(f) (f) Developing personnel policies and procedures;	.20 Personnel Records	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(10)(g) (g) Census development; and	.04 License Required	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(10)(h) (h) Marketing;	.06 Restrictions	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(11) (11) Emergency planning, 4 hours, including...	.47 Emergency Preparedness .42 General Physical Plant	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(12) (12) Quality assurance, 4 hours, including:	.13 Administration	<input type="checkbox"/> Yes <input type="checkbox"/> No
COMAR 10.07.14.17A(13) (13) Survey process, 2 hours, including... (refer to detail in .17 A (13))	.11 Investigation by Department .14 Staffing Plan .12 Compliance Monitoring .57 Sanctions	<input type="checkbox"/> Yes <input type="checkbox"/> No

OHCQ Reviewer: _____ Date: _____

Title: _____