

To:

## Executive Office of Health and Human Services Department of Public Health Bureau of Health Care Safety and Quality 67 Forest Street, Marlborough, MA 01752

MARYLOU SUDDERS Secretary

MARGRET R. COOKE Commissioner

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KARYN E. POLITO Lieutenant Governor

All Nursing Homes and approved Nurse Aide Training Programs

From: Elizabeth Kelley, Bureau Director

Re: Nurse Aide Testing Requirements and On-Site Observation and Work Credit for Nurse

Aide Training

Date: May 10, 2022

In March 2020, the Centers for Medicare and Medicaid Services (CMS), under its 1135 authority, waived its requirement that facilities not employ a nurse aide for longer than 4 months unless the nurse aide has met the training and certification requirements to become a certified nurse aide (CNA). This requirement was waived in order to mitigate potential long-term care staffing shortages during the pandemic.

CMS recently announced this blanket waiver is terminating as of June 6, 2022. As part of this announcement, CMS advised long-term care facilities that upon termination of the blanket waiver, nurse aides employed by a facility will need to complete the federally required training and exam within four months by October 6, 2022.

The Department of Public Health (Department) has developed an attestation process for nursing homes to grant training credit to nurse aides working in their facility between the start of the State of Emergency in Massachusetts (3/10/20) through June 6, 2022.

Under this process, the Director of Nursing or Staff Development Coordinator of a licensed nursing home may attest, on the attached form developed by the Department, that through on-site observation and work experience including online or other training, a nurse aide has completed:

- 16 hours of initial curriculum training; and/or,
- 21 hours of clinical experience; and/or,
- Less than 75 hours of training on all required curriculum topics; or,
- 75 hours of training on all required curriculum topics ("Full Credit")

When attesting to full or partial credit, the nursing home must ensure that all of the required areas of training at 42 CFR §483.152(b) are addressed, and any gaps in onsite training are identified using the Department's attestation form. Full credit attestation forms must be mailed to Prometric LLC, the Department's testing vendor, to the mailing address listed below. Partial credit attestation forms must be submitted to the nurse aide training program where the nurse aide can complete the required training.

Nurse aides with **full credit** may schedule testing with Prometric LLC, once the nursing home has directly submitted the completed attestation form to Prometric. Attestation forms for full credit may be submitted by mail to Prometric at the following address:

Prometric MA Nurse Aide 7941 Corporate Drive Nottingham, MD 21236.

Attestation forms will not be accepted by Prometric directly from the CNA candidates.

In addition, the Director of Nursing or Staff Development Coordinator must provide the nurse aide a brief statement on letterhead indicating the individual has completed 75 hours of training on all required curriculum topics and is eligible to test. That statement should be brought by the nurse aide to their testing session. Questions regarding the testing process or scheduling should be directed to Prometric at (800) 722-2594 or MACNA@prometric.com.

Additional training for nurse aides with **partial credit** must be coordinated by the nursing home or the individual nurse aide with an approved training program. A list of approved training programs is available online at: <u>Department-approved Nurse Aide Training Programs</u>. Once the nursing home or the nurse aide has identified a training program at which to complete training, the attestation form for partial credit must be submitted directly to the training program by the nursing home. Attestation forms will not be accepted by training programs directly from the CNA candidates. Questions regarding the completion of any remaining training should be directed to the specific training program.

CMS and the Department strongly encourage nursing homes and nurse aides to explore ways to complete training and testing as soon as possible. Please note that testing based on an attestation for full or partial credit for training must be completed by the end of this calendar year (December 31, 2022), regardless of expiration date of the CMS 1135 waiver or when you started working.

Questions regarding the attestation process are addressed in the Frequently Asked Question (FAQ) document posted on the Department's website at: <a href="https://www.mass.gov/nurse-aide-registry-program">https://www.mass.gov/nurse-aide-registry-program</a> or may be directed to the Nurse Aide Registry Program at: <a href="mailto:nars@state.ma.us">nars@state.ma.us</a>