

Deidre S. Gifford, MD, MPH Acting Commissioner



Ned Lamont Governor Susan Bysiewicz Lt. Governor

HEALTHCARE QUALITY AND SAFETY BRANCH

BLAST FAX 2021-20

TO: Nursing Homes

FROM: Acting Commissioner Deidre S. Gifford, MD, MPH

CC: Deputy Commissioner Heather Aaron, MPH, LNHA

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Section

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DATE: July 14, 2021

SUBJECT: Temporary Nurse Aide Bridge to Certified Nurse Aide (CNA) Program

Governor Lamont's Executive Order 7SS, signed on May 27, 2020, authorized the Commissioner of the Department of Public Health to register Temporary Nurse Aides to allow individuals with specialized training, as prescribed by the Department to provide certain nurse aide services. Temporary Nurse Aides have been an invaluable resource to facilities throughout Connecticut during COVID-19. However, Executive Order 7SS is expiring on July 20, 2021.

In order for a Temporary Nurse Aide to continue to work after July 20, 2021, they must either (1) be enrolled in an approved training program or (2) have completed an approved nurse aide training program and be working within <u>the allowed</u> 120 days after hire prior to successfully completing the Nurse Aide exam.





The Department is offering an opportunity for facilities to provide nurse aide training to **currently employed** Temporary Nurse Aides to allow them to become Certified Nurse Aides (CNAs) and continue their important work into the future. The following guidance outlines this opportunity which aligns with Connecticut's nurse aide regulations and guidance from CMS. All facilities must obtain approval from DPH prior to implementing this training program. The Department is committed to timely review and approval of these training programs.

Once the nurse aide trainee has completed the facility's training program (including the required training hours and all the required modules), the training program will issue the trainee, documentation that the trainee has completed the required training (e.g. a signed certificate or letter on facility letterhead). This documentation is required for the temporary nurse aide to register to take the Connecticut Nurse's Aide Examination. A temporary nurse aide that has completed the training can work in a chronic and convalescent nursing home or rest home with nursing supervision as a nurse's aide for 120 days while waiting to take the Connecticut nurse's aide exam to become certified. Nurse Aides who have completed their training but are waiting to take the exam can be counted in the staffing ratios.

CT NURSE AIDE EXAM: Upon completion of the required training and receiving a certificate of training, the trainee can apply as a new candidate (also known as a "Route 1" candidate) to take CT nurse's aide exam administered by Prometric. When the candidate passes the exam, their name will be added to the CT nurse's aide registry, and they will receive a CT nurse's aide certificate/registration number.

Create a Facility-based Training Program

STEP 1: Submit Documents to DPH

Facilities electing to offer a CNA training program must submit to the Connecticut Department of Public Health Nurse Aide Registry three (3) items -1) a Curriculum and Course Overview; 2) the resume of the proposed Primary Training Instructor; and 3) resumes of other proposed instructors. Below are details describing each of the items:

1. Curriculum and Course Overview

Facilities must ensure that all components of the model CT nurse's aide training curriculum have been or will be provided to each trainee: Facilities must submit to the Department a course overview/syllabus that is consistent with the hours documented in the training program's curriculum

Microsoft Word - Curriculum.doc (ct.gov)

Connecticut requires the total number of classroom hours (theory) and clinical hours (practical) to total at least 100 hours and may include the training hours required to become a temporary nurse aide through the program developed by the American Health Care Association (AHCA). Each facility must complete the hour's portion of the curriculum document as it relates to the facility's proposed training program.

Any training that has occurred during the employment of the temporary nurse aide may count towards the minimum 100 hours of required training for certification as a CNA. However, the facility-based instructors must ensure that all training modules outlined in Connecticut's model nurse's aide training curriculum are incorporated into each trainee's learning experience. This may require some students to complete more than 100 hours of training.

Per CMS Memorandum (Ref: QSO-21-17-NH), CMS recommends that states evaluate their Nurse Aide Training and Competency Evaluation Programs (NATCEP), and consider allowing some of the time worked by the nurse aides during the PHE to count towards their 75-hour training requirement. However, states must ensure that all of the required areas of training per 42 CFR §483.152(b) are addressed, and any gaps in onsite training that have been identified are fulfilled through supplemental training. Lastly, nurse aides must still successfully pass the state's competency exam per 42 CFR §483.154.¹

Components of a temporary nurse aide training that qualify for bridge to a CNA training include:

- 1. The AHCA temporary nurse aide on-line training (8 hours).
- 2. Classroom Training The total hours of classroom training provided to the temporary nurse aides prior to providing care to residents as documented by the facility. The hours will vary from facility to facility, based on the orientation, on the job training and any additional training that may have been provided since the facility hired the temporary nurse aide. Training hours may vary between Temporary Nurse Aides based in their experiences.
- 3. Skills Lab/Clinical Training The total hours of skills/clinical training provided to the temporary nurse aide prior to providing care to residents as documented by the facility. The number of hours for skills and clinical training will be determined by the individual facility based on the experiences of the temporary nurse aide provided during their employment.
- 4. On the job training The total hours of on the job training provided by the facility staff. On the job training is a valuable component of the program and experiences are credited toward training hours.

Hours worked on the floor providing direct patient care as a temporary nurse's aide.

2. Resume of proposed Primary Training Instructor (PTI)

Training for nurse aides must be performed by or under the general supervision of a registered nurse who possesses a minimum of two years of nursing experience, at least one year of which must be in a chronic and convalescent nursing home or rest home with nursing supervision. (The DNS can be designated as the PTI in an administrative role but cannot perform any instruction). Direct training and instruction may be provided by a Registered Nurse or a Licensed Practical Nurse as noted in step 3. The facility shall be responsible for ensuring all individuals serving as CNA's have met the training requirements. In addition, once the training requirements are met, the individual may work for 120 days pending the examination for certification. The primary training instructor shall develop and maintain a system for recording student training hours.

3. Resumes of proposed Instructors

Licensed practical nurses (LPNs), under the supervision of the nurse's aide primary training instructor (PTI), may serve as trainers in the nurse's aide training program provided the LPN has at least two years' experience in caring for the elderly or chronically ill of any age.

Others may serve as trainers in the nurse's aide training program under the supervision of the nurse's aide primary training instructor provided they have a minimum of one year of experience in a facility for the

¹ QSO 21-17, Updates to Long Term Care (LTC) Emergency Regulatory Waivers issues in response to COVID 19

elderly or chronically ill of any age within the immediately preceding five years. These professions include: Registered nurses, sanitarians, fire safety experts, nursing home administrators, gerontologists, psychologists, physical and occupational therapists, therapeutic recreation specialists, speech/language/hearing therapists. All trainers should be, where applicable, licensed, registered and/or certified in their field.

All documents required pursuant to #1, 2 and 3 and any questions can be forwarded to:

Karen G. Wilson
Nurse Aide Registry
CT Department of Public Health
Practitioner Licensing and Investigations
410 Capitol Ave., MS#12APP
PO Box 340308
Hartford, CT 06134-0308
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STEP 2: DPH Conducts On-Site or Virtual Inspection

Once all documentation is submitted for approval as a CNA training program, DPH conducts an on-site or virtual inspection to observe the:

- 1. Classroom An area used for classroom (theory) instruction.
- 2. Skills Lab The skills lab can be located in the classroom or in a location such as unoccupied resident rooms.
- 3. Training Equipment and Educational Tools This may include, but is not limited to:
 - a. CNA training textbook (Most Popular Publishers: Hartman's, Lippincott, Mosby's, Hegner);
 - b. Books, CDs, Videos; and
 - c. Assessment tools Tests, Quizzes and Skills Checklist.
- 4. System for Recording and Maintaining Student Training Hours.
- 5. Student File Maintenance for students who have completed the program.

Please send all documents electronically to Karen Wilson at karen.wilson@ct.gov. As a reminder any Temporary Nurse Aide not enrolled in a CNA training program by July 20, 2021 may not be employed to provide certified nurse aide services.