Staffing & Workforce: Nurse Aide Training Brief

Last updated April 7, 2020. These questions are part of a larger Q&A document prepared for members of LeadingAge Ohio in response to the most frequently asked questions related to the COVID-19 pandemic.

SW6. Q. We are thinking of using nursing students as aides in our nursing facility. Do you know of any additional documentation needed to do this?

- **SW6. A.** The CMS blanket waivers granted on March 30 provided additional flexibility regarding who can be employed as a nurse aide in nursing homes. CMS waived training and certification requirements for nurse aides during the pandemic, allowing more individuals to serve in this capacity. However, the formal state-tested nursing assistant (STNA) licensure requirements are still in rule, and a nursing student could become a licensed STNA under the criteria in OAC 3701-17-07.1, which permits nursing students to serve as a nursing assistant. The OAC rule states:
 - (6) The individual is enrolled in a prelicensure program of nursing education approved by the board of nursing or by an agency of another state that regulates nursing education, has provided the long-term care facility with a certificate from the program indicating that the individual has successfully completed the courses that teach basic nursing skills including infection control, safety and emergency procedures and personal care, and has successfully completed the competency evaluation program; or
 - (7) The individual has the equivalent of twelve months or more of full-time employment in the preceding five years as a hospital aide or orderly and has successfully completed a competency evaluation program.

SW7. Q. Does the March 30 blanket waiver that waived nurse aide training requirements mean that individuals do not have to be test-ready? We could train anyone as long as they have demonstrated competency?

SW7. A. ODH has affirmed that blanket waivers granted by CMS on March 30 mean that so long as an individual passes other hiring screenings, like background checks, and can demonstrate competency in performing nurse aide tasks, they may be hired. This could be an individual who went through NATCEP training, and didn't pass the written or skills part.

For individuals who are seeking to ultimately function as an STNA, the waiver does not preclude individual requirements to obtain an STNA licensure. While severely limited by closures, STNA testing does continue in Ohio.

SW9. Q. With the nurse aide waiver, can we use our residential nursing assistants that work in assisted living in the nursing home if we test for competency on tasks they don't normally perform? What about training office staff?

SW9. A. Yes, you can use existing staff, so long as they are competent to provide nurse aide tasks. It is very important for providers to document this competency.

SW10. Q. For onsite training would we have to use certified trainers?

SW10. A. No. A certified trainer is not required. The CMS waivers did not proscribe who would perform nurse aide training. The Ohio Board of Nursing offers the following guidance, in terms of delegation of authority:

In general, nurses are authorized to delegate a nursing task to an unlicensed person or teams of unlicensed persons, provided the task is not prohibited (such as unauthorized medication administration), the nurse has obtained verification that the unlicensed person is educated and competent in the safe performance of the task, and the task does not require complex observations or critical decisions be to be made during the performance of the task. Nurses may delegate to persons who have existing authority to administer medications, including MA-Cs certified by the Board of Nursing or medication aides certified by the Ohio Department of Developmental Disabilities. RNs and LPNs may not delegate to an unlicensed person, the administration of medications with the exception of over the counter topical medications applied to intact skin, over the counter eye drop, ear drops, suppository medications, foot soak treatments, and enemas.

<u>LeadingAge Ohio recommends that a nurse be the one to assess the competency of the individual aide, before nursing tasks can be delegated.</u>

SW11. Q. Does your facility have to be a NATCEP-approved provider or can any facility provide the training? What about a facility that previously had their NATCEP approval suspended?

SW11. A. A facility does not have to be an approved NATCEP training program. Any facility can develop training programs and competency evaluations.

The nurse aide blanket waiver doesn't address nurse aide training programs that have had sanctions. Rather, since standardized training is not required during the state of emergency to perform nurse aide tasks, nursing facilities can offer a condensed nurse training program to enable people to move very quickly to the front line.

SW13. Q. If we train someone to be an aide do they still need to go through training and testing to be on the registry of nursing assistants?

SW13. A. Across Ohio, many NATCEP testing centers have been closed, making it difficult for STNAs to sit for their tests. Once the state/national emergency is lifted, we anticipate testing will resume at full pace and STNAs will need to complete all the requirements previously in place.

SW14. Q. We have had requests from facilities to help with feeding patients. Can nursing home social workers help to feed patients in facilities?

SW14. A. Yes, social workers can assist with eating, provided they are trained and assessed for competency in performing the tasks you will have them do. Nursing homes should document the training, as well as any evaluation to demonstrate competency in the tasks assigned.

ODH has also offered a suggestion that a nursing facility that does not have a dining training program could utilize the dining assistant program which is available for download Dining Assistants Program Standards and Guidelines. ODH has also stated they are approving and reactivating formal dining assistant programs if a nursing facility desires to do so. A nursing facility is not required to have an "approved" dining assistant program through ODH in order to do dining training.

SW15. Q. Will test ready staff that exceed the four months be tested once testing sites are back up and running?

SW15. A. Guidance has not been provided as of this date regarding testing once the waiver is removed.