



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
Aging and Long-Term Support Administration
PO Box 45600, Olympia, Washington 98504-5600

March 15, 2024
Amended July 25, 2024

ALTSA: NH #2024-011
CLARIFICATION TO THE TEMPORARY PROCESS FOR
VERIFICATION OF NURSING ASSISTANT-REGISTERED (NAR) ELIGIBILITY
TO CONTINUE WORKING PAST 4-MONTHS IN A NURSING HOME (NH)

Dear Nursing Facility/Home Administrator:

Code of Federal Regulations (CFR) [483.35\(d\)\(1-3\)](#), requires that nursing assistant registered (NAR) staff working in nursing homes (NH)s have completed a training and competency evaluation program or compensate evaluation program. During the public health emergency (PHE), this requirement was temporarily suspended. Department of Social and Health Services (DSHS or department) applied for and received approval for a 1135 waiver to address identified barriers in the nursing assistant training and certification process. This waiver remained in effect until May 11, 2023.

Credentialing backlogs at the Department of Health (DOH) has resulted in longer timelines for processing applications for nursing assistant certification. As a result, NH NAR staff who have submitted applications for certification, after successfully completing required training and testing, have been unable to continue employment after the 4-month deadline. This has negatively impacted NH staffing statewide.

On March 15, 2024, the department implemented a temporary process, in compliance with federal requirements in CFR [483.35\(d\)\(1-3\)](#), to allow NH NAR staff to continue working past 4 months (120 days), with DOH certification pending, when all training and testing requirements have been successfully completed.

The department has identified that a number of NHs throughout the state have struggled to understand the guidance outlined in the temporary process. While the guidance for this process remains unchanged, the following clarifying information has been added:

- *NARs have 120 days from the time they are hired to complete training, testing and certification. They **cannot** provide resident care after 120 days if they have not tested. This includes NARs who may have graduated several years ago; or those who have not completed a training program. NARs have 120 days to get tested; and get trained and tested; respectively.*
- *NARs are only permitted to work in NHs for **more than 120 days** by following the **Temporary Process for Verification Procedure** (outlined below). All documentation must be gathered and kept in the employee file for survey purposes. NARs will continue to hold the title of NAR until they receive their NAC credential.*

This allowance permits NARs to continue to work in NHs beyond 4-months (120 days), when they can provide evidence of the following:

1. **Successful completion of training** - Acceptable documentation includes:
 - A certificate of completion from an approved nursing assistant training program;

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OR

- Authorization to test from DOH-Credentialing or the Washington State Board of Nursing (WABON).
2. **Successful completion of competency evaluation (state test)** – Acceptable documentation includes:
- Passing skills test score sheet emailed from WABON;
- AND**
- Passing online written test score sheet from Credentia.
3. **Completion of the Certification Application Attestation Form (DSHS Attestation Form)** – Acceptable documentation includes:
- Signed and dated DSHS Attestation Form

The NAR will:

- Complete the Nursing Assistant Registered (NAR) Certification Application Attestation Form; and
- Submit this form and required documentation to the NH prior to the 120th day of employment; and
- Check their email at least weekly for confirmation of certification and respond timely to requests from DOH for additional information or documentation; and
- Notify the NH, in writing, of any credentialing status changes, within 48 hours of the change.

The NH will:

- If the NAR has failed to successfully complete required training and testing prior to the 120th day of employment, ensure the candidate is no longer working in the NAR role.
- Prior to the NARs 120th day of employment with pending certification, obtain the signed Nurse Assistant Registered (NAR) Certification Application Attestation Form and documentation that required training and testing were successfully completed; and
- Ensure all of these documents are included in the employee personnel file; and
- Not less than monthly, review certification status on the DOH website, <https://fortress.wa.gov/doh/providercredentialsearch/>, ensure NAR staff are checking their email at least weekly, and respond to requests from DOH for additional information or documentation in a timely manner; and
- If DOH denies the application for certification, ensure the employee is no longer employed within the NAR classification as of the date of denial.

RCS Surveyors Will:

- When conducting the Sufficient and Competent Nurse Staffing Review (Form CMS-20062) and/or the Staff Qualification and Background Review (DSHS 10-631):
 - Review the Nursing Assistant Registered (NAR) Certification Application Attestation Form, verifying a NAR who has not yet received their nursing assistant certification, has signed and dated the form, confirming they have met each of the conditions listed on the form, including successful completion of training and the competency evaluation (state test).
 - Confirm the NH maintains readily available copies of all acceptable documentation listed in the Nurse Assistant Registered (NAR) Certification Application Attestation Form.
 - Verify the NH, not less than monthly, reviewed the NARs certification status on the DOH website, <https://fortress.wa.gov/doh/providercredentialsearch/>, confirm the NAR checked their email at a minimum weekly, responded timely to requests from DOH for additional information or documentation and notified the NH of all credential status

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- changes as they occurred.
- If a substantial amount of time has passed (two to three months) without the NAR becoming certified, request the NH provide a copy of the nurse aide's Omnibus Budget Reconciliation Act (OBRA) Registry to show proof of the NARs current status.
 - When following the Sufficient and Competent Nurse Staffing Review Pathway for Critical Element (CE) #7 – *“Does the facility ensure full-time nurse aides have become certified within 4-months of nurse aide training?”* Determine if the NAR has worked beyond 4months. If documentation is not present in the NARs employee file, the surveyor/CI will request the NH provide documentation of each of the required elements listed in the *NAR Certification Application Attestation Form*. If all elements are met, mark “Yes” to CE #7. If the NH fails to provide ANY of the required documentation, mark “No” to CE #7.
 - Surveyor/Complaint Investigators should include their decision-making process in their documentation, referencing the interim guidance provided in the management bulletin. Also, issue a citation to the NH for noncompliance at F728 if the facility failed to do any of the following:
 - Not less than monthly, reviewed certification status on the DOH website, <https://fortress.wa.gov/doh/providercredentialsearch/>; and
 - Ensure NAR staff are checking their email at least weekly for certification updates and/or requests for additional information or documentation; and
 - Respond to requests from DOH for additional information or documentation in a timely manner; and
 - If DOH denied the application for certification, and the NAR remained employed at the NH as a NAR.

This guidance will remain in effect until further notice.

If you have any questions, please contact [Tiffany Meyers](#), Policy Program Manager, RCS at (360) 464-0373 or [Anne Richter](#), Nursing Assistant Training and Competency Evaluation Program Manager/OBRA Registry Manager, RCS at (360) 725-2596.

Thank you for your continued commitment to resident health and safety.

Sincerely,

 for

Amy Abbott, Director
Residential Care Services

DSHS: “Transforming Lives”