



STATE OF WASHINGTON  
DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
Home and Community Living Administration  
PO Box 45600, Olympia, Washington 98504-5600

June 30, 2025

NH #2025-028

**REINSTATING 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:

**The guidance in this memorandum supersedes ALTSA: NH 25-006, *Rescinding the Temporary Process for Verification of NAR Eligibility to Continue Working Beyond 120 Days in a NH*.**

The Code of Federal Regulations (CFR) [483.35\(d\)\(1-3\)](#), requires that NAR staff that work in nursing homes (NHs) complete a training and competency evaluation program or a compensated evaluation program.

From March 15, 2024, to February 28, 2025, Residential Care Services (RCS) implemented a temporary process to confirm NAR eligibility in NHs, in compliance with federal requirements, to address a Department of Health (DOH) credentialing backlog of NAR certifications. This allowed NH NAR staff to work for more than four months (120 days) in a NH while awaiting their DOH certification, provided they successfully completed all training and testing requirements.

In April 2025, DOH launched a new licensing system referred to as the Health Enforcement and Licensing Management System (HELMS) for all health professionals and facilities in Washington state. Currently, the DOH is experiencing a backlog of NAR certifications as they adjust to this new system.

To alleviate this backlog, RCS, in coordination with DOH, has decided to **reinstate** the temporary process for verifying NAR staff, allowing them to work for over four months while they wait for their DOH certification, if they have met all training and testing criteria.

**Effective June 27, 2025**, this allowance permits NARs to continue to work in NHs beyond four months, when they can provide evidence of all of the following items:

1. **Successful completion of training** - Acceptable documentation includes:
  - A certificate of completion from an approved nursing assistant training program;
2. **Successful completion of competency evaluation (state test)** – Acceptable documentation includes:
  - Passing skills test score sheet emailed from the Washington State Board of Nursing (WABON);
  - Passing online written test score sheet from Credentia; **and**
3. **Completion of the Certification Application Attestation Form** [\(DSHS Attestation Form\)](#) - Acceptable documentation includes:
  - Signed and dated DSHS Attestation Form.

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### The NAR will:

- Complete the [Nursing Assistant Registered \(NAR\) Certification Application Attestation Form](#);
- Submit this form and required documentation to the NH prior to the 120<sup>th</sup> day of employment;
- 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:

- Ensure the candidate is no longer working in the NAR role if they fail to complete required training and testing prior to the 120<sup>th</sup> day of employment;
- Obtain the signed [Nurse Assistant Registered \(NAR\) Certification Application Attestation Form](#) and documentation that the required training and testing was successfully completed prior to the NARs 120<sup>th</sup> day of employment with pending certification;
- Review the NAR's certification status on the DOH website, <https://fortress.wa.gov/doh/providercredentialsearch/>, to 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 (not less than monthly),
- Ensure that an Omnibus Budget Reconciliation Act (OBRA) Registry verification is obtained prior to moving the NAR into the NAC position;
- Ensure the employee is no longer employed within the NAR classification, as of the date of denial, if DOH denies the application for certification; and
- **Include all supportive documentation in the employee's personnel file.**

### RCS Surveyors/Complaint Investigators (CIs) Will:

- When reviewing personnel records and completing the **Staff Qualification and Background Review Form (DSHS 10-631)**:
  - Review the [Nurse Assistant Registered \(NAR\) Certification Application Attestation Form](#) to verify if the NAR has signed and dated the form, confirming they met each of the conditions listed, 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 that the NH, not less than monthly, reviewed the NARs certification status on the DOH website, <https://fortress.wa.gov/doh/providercredentialsearch/>, to confirm the following:
    - 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 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 OBRA Registry to show proof of the NARs current certification status.
- When determining compliance for the **Sufficient and Competent Nurse Staffing Review Pathway (Form CMS-20062, Dated 04/2025)** for Critical Element (CE) #12 – *"Does the facility ensure full-time nurse aides complete a state-approved training and/or competency evaluation program within 4 months of starting work in the facility?"*
  - Request that the NH provide documentation for each of the required elements listed in the *NAR Certification Application Attestation Form*.
    - If **all** elements are met, mark "Yes" to CE #12.
    - If the NH fails to provide **ANY** of the required documentation, mark "No" to CE #12.

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- **This criterion meets the NHs responsibility to ensure NARs have met the federal requirement regardless of the DOH backlog.**
- Cite the NH for noncompliance at **F728** [CFR §483.35(d) (1-3)] 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/>;
  - Ensure NAR staff are checking their email at least weekly for certification updates and/or requests for additional information or documentation;
  - Respond to requests from DOH for additional information or documentation in a timely manner; and
  - If DOH denied the application for certification and the employee remained employed at the NH as a NAR.

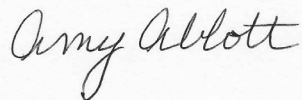
**This guidance will remain in effect until further notice.**

Thank you for your continued commitment to residents' health and safety. 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.

Sincerely,



Amy Abbott, Director  
Residential Care Services

DSHS: *"Partnering with People"*

*Related References:* [42 CFR 483.35\(d\)](#), ALTSA: NH 25-006, [DSHS 10-631](#), [Form CMS-20062](#)