

Senate Health and Human Services Committee
Senate Aging and Youth Committee
Joint Hearing on Temporary Nursing Aide Testing
06/21/2022

Joint Testimony
Department of Human Services
Department of Health
Department of Education

Certified Nurse Aide (“CNA”) is an industry term that in Pennsylvania refers to nurse aides who appear on the Pennsylvania Nurse Aide Registry. An individual can appear on the PA Nurse Aide Registry in one of two ways:

- completing a state approved training and successfully pass state written and skills test within the last 24 months
- reciprocity application from being active and in good standing on another state’s registry

To address critical staffing shortages during the pandemic, on March 1st, 2020 the federal Centers for Medicare and Medicaid Services (CMS) waived the requirements that individuals hired as nurse aides must have completed required training and testing¹. This waiver created the category of Temporary Nurse Aide, or TNA. The CMS waiver indicated that anyone could be hired to perform nurse aide work during the waiver under the following circumstances:

- Individuals who have completed an 8 hour online training or comparable program, passed a test and completed core competencies
- Individuals who were trained or in the midst of training but not yet tested (this group could be employed beyond the 120 days that is typically permitted for new nurse aide hires)
- Individuals that had a lapsed registry within the last 10 years

These requirements were codified and elaborated upon in Act 138 of 2020, sponsored by Senator Judy Ward. The Act laid out a Temporary Nurse Aide Pathway through the Department of Education that would provide a process for TNAs who worked in these health care settings during the pandemic to complete their training, take their exams, and eventually be listed on the Nurse Aide Registry as a full CNA.

On April 7th, 2022², CMS gave notice that this waiver would be terminated in 60 days, and that no individuals could be hired as TNAs after June 6th, 2022. TNAs hired before June 6th could continue to work in health care facilities, but would need to complete their training and testing by October 6, 2022 in order to continue working as a nurse aide.

To that end, the Wolf Administration has been working closely with Credentia, with facility and training stakeholders, and with TNAs to provide appropriate testing opportunities for TNAs who wish to be listed on the Nurse Aide Registry after October 6th, and to facilitate collaboration among these entities. These efforts have focused on increased employer engagement to ensure facilities that employ TNAs are aware of the steps involved in the TNA Pathway and resources available to support their TNAs to prepare for the exams. The Governor’s office will continue to be directly involved in these conversations to troubleshoot and assist as necessary.

¹ <https://www.cms.gov/files/document/covid-19-emergency-declaration-waivers.pdf>

² <https://www.cms.gov/files/document/qso-22-15-nh-nltc-lsc.pdf>

Contracts for Nurse Aide Registry and Nurse Aide Exam Administration:

- DHS holds the contract for a vendor to operate the state's Nurse Aide Training and Testing Registry.
- DHS is responsible for the resolution and adjudication of disputes regarding the NATCEP program.
- DHS is responsible for the termination of Nursing Facility's Nurse Aide training program based on CMS action and DOH survey results per 42 USC § 1396r(f)(2)(B).
- DHS can grant waivers to the denial of Nurse Aide training programs with input from DOH and PDE to operate the program in, but not by, their facility.
- DHS provides information and assistance regarding federal regulations for reimbursement from Nursing Facilities to Nurse Aides.
- DHS is responsible to reimburse Nursing Facilities the reasonable and appropriate costs for training and testing fees occurred by individuals employed or offered employment within 12 months of completing the NATCEP program.
- DHS has oversight and will monitor the vendor contract to ensure they are providing testing instruments, administer testing and transmit information to the registry.
- The vendor (Credentia) must ensure the availability of federally required written and skills exam testing opportunities for person's seeking Nurse Aide Registration.
- Exam availability includes online and in-person opportunities to complete the written exam with proctors. It also includes in-person opportunities to complete the skills exam in a sufficiently supplied and appropriate clinical setting with credentialed proctors.

Consolidated Timeline of Contracts for Nurse Aide Registry and Nurse Aide Exam Administration:

- December 21, 2020: PearsonVue announced that Credentia (previously a subcontractor) will be acquiring the Nurse Aide Registry
- January 7, 2021: Meeting held to discuss the transition from PearsonVue to Credentia
- May 28, 2021: New purchase order issued to Credentia
- August 2021: Transition activities commenced across Departments
- September 16, 2021: DOH DNCF, DHS OLTL, and PDE met with Credentia and were told that there would be a new system and all data will be carried over to the new system
- September 20, 2021: It was announced to the DOH DNCF, DHS OLTL, and PDE that there would be a blackout period from 12/21/21 through 1/2/21 for data migration to a new system. No one would be able to access the registry and no exams would be scheduled at that time
- October 1, 2021: DHS, DOH, PDE and Credentia met to review the PA Candidate handbook and notices issued to CNA's.
- October 12, 2021: A letter was sent by Credentia to the Nurse Aide Training Programs announcing the change-over of systems and the blackout period.
- October 21, 2021: Contract renewed with Credentia
- December 21, 2021, to January 2, 2022: Blackout period for migration to CNA365
- January 3, 2022: New CNA365 system goes live

- January 2022-Present: Program offices continue to work with Credentia through systems issues as they arise

Temporary Nurse Aide Testing Statistics as of June 14, 2022:

Of 2441 nurse aide attestation forms submitted to the Department of Education:

- 1833 processed for testing
- 608 returned as incomplete

Of the 1833 processed for testing, 887 took the written test and 791 (89%) passed.

550 nurse aides have taken the skills test and 352 (64%) passed.

275 nurse aides have passed both written and skills tests and have been enrolled in the Nurse Aide Registry.

287 are currently scheduled for the written test.

557 are currently scheduled for the skills test.

In addition, PDE continues to receive and review TNA attestation forms and will participate in ongoing conversations with Credentia, industry partners, and other stakeholders. PDE will also continue to monitor TNA pass rates for the written and skilled exams and is pleased to provide updates on these matters to interested members of the General Assembly.