# STAY IN THE KNOW:



# SOUTHERN ILLINOIS UNIVERSITY

CUMULATIVE UPDATE FOR COORDINATORS & INSTRUCTORS DECEMBER 2024

#### What Is in This Update?

A broad review of current information about Code compliance affecting programs across the state. These issues are commonly seen on compliance visits. This information is essential to Code compliance and program success. Please READ CAREFULLY and give information to your instructors as applicable.

#### WHAT'S NEW THIS MONTH?

PBVS (PRIVATE BUSINESS VOCATIONAL SCHOOL) Ensure compliance with both IBHE and IDPH for CNA programs. Non-compliance with IBHE (e.g., annual renewals) will prevent class scheduling.

#### Lab Hour Clarification

Minimum required hours: 62 hours of theory and 18 hours of lab (or 64 theory, 16 lab). If you have 16 lab hours, you won't meet the 80-hour minimum.

#### **Program Coordinator Guide Update**

Guide is available online at nurseaidetesting.com.

#### **Student Training Entry**

Enter student training only once. Update the Last Day Date in the original entry at the end of the program.

#### **Makeup Policy Requirement**

Must include makeup options for theory, lab, and clinical hours in your handbook or syllabus.

#### **Email Communication**

Check email daily. Responses to IDPH or Education Coordinators must be within three weekdays.

#### **Schedule Change Notifications**

Notify dph.bnatp@illinois.gov for cancellations within two weeks, if over send a revised schedule

#### **Monitoring Visit Binder**

Verify documents in your binder are up to date

#### **Keep Recent Monthly Updates**

Ensure the last 2-3 monthly updates are in your binder.

#### **COMMUNICATION WITH IDPH**

#### **Subject Lines**

Program code numbers MUST be included on ALL emails regardless of the topic (IDPH Update, July 2023.)

#### How to Reply

Do not start a new email. ALWAYS reply to the original email to preserve the email thread. Example: if you request a delay in sending a Master Schedule, please send the schedule attached to the same email where you received the approval.

# Emails or voicemails from IDPH and personnel at the SIUC Nurse Aide Testing (NAT) Office

Must receive a response or an out of office reply with a return to office date shown.

#### Where to Send

Randy Carey-Walden at IDPH -- Email: dph.bnatp@illinois.gov

### **UPCOMING EVENTS**

CNA INSTRUCTOR CONFERENCE 2025 EmpowerED: Embracing Innovation in CNA Education April 10-11, 2025 Registration will open in January

FOR MORE INFORMATION RELATED TO PROGRAMS GO TO <u>NURESEAIDETESTING.COM</u> > COORDINATORS AND INSTRUCTORS As a CNA instructor, you're not just teaching skills you're building the foundation of compassionate care that changes lives.



#### IN CASE YOU MISSED IT

**Height measurement** cannot be removed from the skills list because it is a federal regulation. We cannot modify those. 42 CFR 483.152 (6) (b) (2) (ii)

Long-term care facilities have been introduced to Enhanced Barrier Precautions for residents with MDRO organisms or the potential for an MDRO

infection. For facility-based programs or those whose students ultimately work in long-term care, it is a good idea to review the pdf at the link below and incorporate it into your infection control education.

A **new document request letter** for monitoring visits that lists the program's required documents is posted at nurseaidetesting.com. The Allocation of Hours form has been removed and replaced by PC RN License Copy and the HCWR Background Checks will be viewed by the coordinator online on the DPH Web Portal.

If your program did not receive binder tabs to help

organize required documents for future monitoring visits, please contact Pam Schemonia at inat@siu.edu. These binder tabs are designed to align with required documentation Program Coordinator during an unannounced visit by the Education Coordinator. While they are not mandatory to use, they can be useful in helping you better organize and prepare for a visit.

#### PC DUTIES & INFORMATION

- 1. <u>**REVIEW MONTHLY UPDATES**</u> Notify instructors of applicable changes.
- 2. Ensure programs are ready for a monitoring visit. All required documents MUST be on site and ready for review within five minutes of the education coordinators arrival. An automatic corrective action plan will be required for non-compliance.
- 3. Violations of the Administrative Code on the first visit that result in a Corrective Action Plan (CAP). If, upon subsequent visits, there are violations of the same nature, regardless of the time elapsed between visits, the program will be placed on probation for 180 days. During that 180-day period, there will be another unannounced visit. If violations of the same nature are found during that probationary period, your program will be revoked for two years.
- 4. PCs and instructors must be versed in the Administrative Code, program requirements, and program standards.
- 5. Check out the NEW <u>Program Coordinator Trainng</u> <u>Guide</u>



SOUTHERN ILLINOIS UNIVERSITY

#### **Program Renewal**

Programs Are Valid for Two Years Only No program application is required.

#### How to Request Reapproval

Programs must notify the Department at dph.bnatp@illinois.gov if there have been any previously unapproved changes to documents a program would submit for program approval. These documents include credentialing documentation, objectives & content, textbook information, evaluation tools, clinical site agreements, final exam, and the course syllabus.

#### What NOT to Send

Please do not send updated RN licenses as those may be obtained online. CPR cards do not need to be sent to IDPH. Keep CPR cards on file in your program binder for review by the Education Coordinators on site monitoring visits.

#### **Vocational Programs ONLY**

Vocational Programs MUST renew with IBHE annually and send the approval certificates from IBHE for the two years to IDPH for program renewal. Proof of approval certificate must be available for monitoring visits.

#### **Program Changes**

Note: changes must be approved within 30 days of the change. If there have been no changes made to the program, send an email stating this with a request for program reapproval.

#### For Multiple Program Sites

If the program sponsor has multiple program sites with the next renewal request that all the sites be renewed at the same time. This will make it easier to remember and it can be done at the same time every two years.

# REGISTER

#### Who can register to take the BNATP program?

Effective January 1, 2023, programs can admit students with an Individual Taxpayer Identification Number (ITIN). Bear in mind that an ITIN does not give an individual work authorization, nor does achieving a CNA certification. It would be best practice to include counseling for those students that may not be able to legally work after completing a BNATP and achieving certification.

To be submitted on a roster, a student MUST have a valid social security number or ITIN #. Each program site MUST have a copy of the SS Card or ITIN on file (the first five numbers can be redacted per IDPH). There are No Exceptions to this and no waivers.

The student must be at least 16 years of age, of temperate habits and good moral character, honest, reliable, and trustworthy. The student must be able to speak and understand English.

#### Master Schedule (MS) Key Points

#### Format

· Use Adobe Acrobat Reader for MS submissions.

#### **Changes That Do NOT Require Submission to IDPH**

- Update the onsite copy for inspection:
  - Clinical site changes to a secondary site already listed.
  - $\circ~$  Instructor additions/deletions (no email to IDPH required).
  - Changes to CPR instructors/companies providing CPR.
  - Short-notice cancellations (e.g., snow days, illness). Notify IDPH via email.

#### **Changes Requiring Submission to IDPH**

- Cancellations of theory or lab sessions over 7 days in the future.
- Changes in class start or end dates (update calendar too).

#### **Revision Guidelines**

- Check the revision box and state the reason.
- For minor changes/makeup days, email IDPH without submitting a revised schedule.
- Build makeup days into schedules to avoid excessive revisions.

#### Lab Hours on the MS

- Minimum 18 face-to-face lab hours required.
- Separate and enter total lab hours on page two.

#### CPR on the MS

- · List CPR instructor or company in the instructor section.
- Valid CPR instructors must have certification (e.g., AHA, Red Cross).

#### **Schedule Submission**

- Submit schedules 15 business days before class start (not more than 30 days in advance).
- Late schedules require prior approval.

#### Hour Calculation

- Total hours = class time minus breaks/lunch. Example: 6 hours 1 hour break = 5 counted hours.
- Ensure total theory/lab hours on calendar match page two of MS.

#### **Additional Guidelines**

- Orientation hours do not count toward required hours but must be listed on the MS.
- Clinical pre/post-conferences can count as clinical hours; site orientation cannot.
- Follow break time rules (e.g., 15 minutes per 2 hours of class).

#### DETAILED MASTER SCHEDULE INSTRUCTIONS LINKED HERE

#### **Break Calculation Table**

CALCULATION OF BREAKS/MEALTIME & HOURS COUNTING TOWARD MINIMUM REQUIRED HOURS A program must show that the students are being provided breaks/meals during theory/lab/clinical hours.	CLASS TIME IN HOURS		IN HOURS	MINIMUM TIME DEDUCTION FROM HOURS COUNTED	TIME DEDUCTION REQUIREMENTS ANY break/mealtime provided to student must be deducted
<ul> <li>Early class dismissal in lieu of breaks is prohibited.</li> <li>This is done by subtracting the total break time from the hours the program is counting.</li> <li>The amount of time deducted is based on the following rule:         <ul> <li>15-minutes of time MUST be deducted for every two hours of class time.</li> <li>The structure of the breaks is up to the program</li> </ul> </li> </ul>	0.25	-	1.75	0.0	from hours counted. This means
	2.0	-	4.0	- 0.25	if you are providing time to use the restroom, get a drink/snack
	4.25	-	6.5	- 0.50	it should not be counted toward
	6.75	-	8.75	- 0.75	class time.
	9.0	-	11.0	- 1.0	If you provide more than the
during the class time but MUST be at least	11.25	-	12.0	- 1.25	time minimum deduction listed
<ul> <li>A 20–30-minute uninterrupted meal break is expected to be provided if class time is during normal meal bours in addition to breaks.</li> </ul>	Hour Conversion Key: 15 minutes = 0.25 hours 30 minutes = 0.50 hours			0.25 hours	this time must also be deducted from counted hours.

45 minutes = 0.75 hours

#### **NEW INSTRUCTORS & THE APPROVAL PROCESS**

Regulations: Detailed in 77 IL Admin Code, Section 395.160

**Approval Timeline:** The Department has 60 business days to approve, deny, or request additional information regarding an instructor approval request. Program Coordinators should plan accordingly and avoid enrolling students or scheduling classes with these instructors until approval is obtained.

#### **Instructor Qualifications:**

Registered Nurse: Must be approved by the Department.

Experience: Two years as a registered nurse.

- One year in caring for the chronically ill, and elderly, or providing long-term care services. **Teaching Experience:** 
  - Experience in teaching adults,
  - Completion of a course in teaching adults, or
  - Experience in supervising nurse aides/assistants.

#### **Submission Process**

- Verify and Submit Documents:
  - Ensure all CEUs are AD/Dementia topic, accredited, and meet the required hours.
  - Only send documents listed on the instructor code application form. DO NOT send nursing licenses, transcripts, driver's licenses, or CPR instructor or provider cards.
  - Send information to dph.bnatp@illinois.gov for review and approval.

#### **Approval Process**

- Instructor Approval Letters:
- IDPH will send an approval letter stating the instructor is approved for theory, lab, skills evaluation, and clinicals.
- The instructor code will be included in the upper right corner of the letter.

REQUIRED DOCUMENTATION FOR NEW INSTRUCTOR APPLICANTS							
APPLICANT TYPE	ANATP-BNATP Instructor Approval Form	Train the Trainer Certificate	4 Accredited CEUs AD & Dementia	Resume or CV			
INDIVDUAL IS SUBMITTING	x	х	Required if Training Not Included with Train the Trainer	N/A			
PC IS SUBMITTING for BSN or HIGHER HIRED BY PROGRAM	x	If completed (not required, but PC MUST ensure training)	Required if no TtT w/AD or <u>not</u> teaching in accredited LPN or RN Program	x			
	AD & Dementia CEUs must display the number of CEUs/contact hours awarded and the accreditation body (e.g., State Board of Nursing, ANCC, ANA). CEUs accepted for RN licensure are acceptable.						
*NOTES	BSN or higher credentialed instructors without TtT course completion, must still understand program standards, operations, and Administrative Code requirements. The hiring program must train these instructors to ensure compliance with all codes and regulations.						

#### **PCs/Instructors That Have Not Taken Train the Trainer Program Responsibility Regarding Training Requirements**

PCs and instructors must be versed in the Administrative Code, program requirements, and program standards. Please use the Program Coordinator Training Guide and review the Administrative Code Section 395.165 Program Coordinator of the Illinois Administrative Code for duties and responsibilities.

#### NEW INSTRUCTOR DECISION TREE: Approval Steps Based on Education, Experience, & Training

- 1. Is the RN seeking instructor approval completed the Train the Trainer (TtT) course?
- Yes:
  - The person will apply for an instructor code independently.
  - Proceed to Document Submission Requirements for Approval
- No:
  - Proceed to the next decision.
- 2. Is the RN hired by an Approved/Basic Nursing Assistant Training Program (A/BNATP)?
- Yes:
  - Program Coordinator (PC) must apply for the instructor's approval.
  - Proceed to Requirements for New instructors Without TtT.
- No:
  - Approval will NOT be provided. RN must be hired by an A/BNATP approval based on CEUs and will not be given to individuals requesting approval without a TtT certificate.

#### Requirements for New Instructors Without Train the Trainer Course

- 3. Does the RN have a BSN (Bachelor of Science in Nursing) or higher?
- Yes:
  - An instructor without Train the Trainer is NOT absolved from knowing program standards, operation, or Code requirements. Hiring programs must train under these provisions and instructors are expected to be familiar with and follow all codes and regulations.
  - Proceed to the next decision
- No:
  - Approval will NOT be provided without the TtT course. Instructors must have a BSN or higher degree.
- **4.** Is the RN an approved instructor in an accredited LPN or RN program?
- Yes:
  - Dementia CEUs are not required for approval to teach in BNATP.
  - Send only resume/CV and instructor code request form.
- No:
  - Must have at least four accredited Continuing Education Units (CEUs) or contact hours in Alzheimer's and related dementias.
  - Proceed to Document Submission Requirements for Approval

#### STATE EXAM REPORTS & RESULTS

#### **Cumulative Cluster Score Summaries for the Program**

Cluster scores from 2016 to present are online. Cluster scores by program code can be found at the Nurse Aide Testing website or by using this link: Cluster Score Results.

#### About Cluster Score Summaries and the Goal for the Program

If the first-time pass rate (FTPR) is 90% or greater, no Corrective Action Plan (CAP) regardless of the cluster scores. The first-time pass rate on the cluster scores does not trigger a Corrective Action Plan (CAP) if all the other metrics have been met or exceeded the goal.

Programs with cluster scores below goals and a first-time pass rate below 70% will be denied for new locations or hybrid programs.

"Programs that cannot increase the FTPR within two years will be revoked." ("ANATP/BNATP Monthly Update July 2022 - Nurse Aide Testing") Programs providing the minimum hours requirement of 80/40 may have to increase hours of instruction to support students in being more successful on the certification exam.

Cumulative Clust	er Score Breakdov	vn of State Exa	am by Duty AreA	
Number of Test Ques	tions Duty A	reas % C	Correct Goal	
12	Communicating In	nformation	50%	
22	Performing Basic I	Nursing Skills	70%	
16	Performing Persor	nal Care Skills	70%	
16	Performing Basic I	Restorative	70%	
4	Providing Mental H	lealth & Social	50%	
5	Providing Residen	t's Rights	50%	
0	VERALL GOAL 1ST TI	ME TESTERS	70%	

#### How to Review Duty Areas Related to State Test Questions

Go to INACE > PC Login > Reports > Program Cluster Score Summary Report > Check Show Clusters Box > Uncheck All Instructors if Selecting a Specific Instructor Code and Check Instructor Code for Reports Specific to Instructors > Enter Date Range > Search. If the report does not give the breakdown of each task and you only see a basic report of overall data, you did not select the "Show Clusters" box.

Go to NAT Website - Coordinators & Instructors – Test Item Development (Scroll down toward bottom of page) - Task Analysis Sheets - Duty Area Task Analysis (These correspond to the duty areas listed above lettered A, B, C, D, E & F). The Task Analysis lists the knowledge, skill and attitudes of a nursing assistant related to each duty area.

## Health Care Worker Registry (HCWR)

## REQUIREMENTS Health Care Worker Registry How to Videos

ALL students (other than those enrolled in secondary programs) must undergo fingerprint criminal background checks via IDPH-approved livescan vendors.

Programs are prohibited from enrolling or allowing students to stay enrolled with disqualifying criminal convictions unless a waiver is granted by IDPH.

The law requires Programs to remove student from the course if found to have any one of the following findings:

- disqualifying criminal convictions unless there is a waiver granted by IDPH, or
- substantiated findings of physical or sexual abuse, neglect, or financial exploitation
- indicated findings of abuse or neglect reported unless there is a waiver granted

## PROCESS

Program Coordinators (PCs) must initiate fingerprint background checks using the IDPH Web Portal prior to enrollment. In some cases, this will need to be initiated in the course orientation day. The student will have 10 days to complete the request before it expires, and a new request would have to be printed. If the student does not complete the process at 30 days, they should be removed from the course.

Completing the background check before the course begins saves the program and the student unnecessary investments of time for a course, they cannot complete should the results show the student is ineligible.

ALL STUDENTS, including secondary must complete an Authorization and Disclosure Form (A&D). This is a legal document that allows the Program to access the HCWR and should be kept on file.

#### ENTERING STUDENT TRAINING DATES IN THE HCWR

The training dates should be entered under the Work History and Training field and the Position Category to be used is "Certified Nursing Assistant Training Program." The Position Type is "Certified Nurse Aide/Assistant."

Providing this information allows the HCWR to contact the program should a disqualifying offense come up while the student is in the program. Programs who do not enter the training history into the registry will be Cited on IDPH monitoring visits.

# **OTHER INFO:**

- Programs are now listed at nurseaidetesing.com as CNA I or CNA II versus BNATP and ANATP.
- Randy has a new email address randy.carey-walden@illinois.gov. Continue using the dph.bnatp@illinois.gov for program correspondence as well.
- Recertifications no longer require skills testing. Those recertifying can go directly to the nurseaidetesting.com site and apply to take the exam.
- Ensure your students understand that they are certified, not licensed, and that IDPH does not issue license numbers. If your program issues a certificate of completion, they need to understand that that shows their successful completion of the program, but it does not make them a CNA. Consider revising any certificates to state that it is only a certificate of completion of the program and does not mean the individual is certified.

#### LONG-TERM CARE FACILITY PROGRAMS

Long-term care facilities that have a BNATP cannot charge a student for any portion of their training, nor can they request repayment if the CNA leaves employment. This is a violation of 42 CFR 483.152 and Illinois Administrative Code Title 89 Section 140.539. Facilities are also required to reimburse a student who has paid for and completed a BNATP elsewhere within the first year of certification. Costs can be recovered by requesting reimbursement through HFS on the facility's Medicaid Cost Report on HFS Form 2310.No individual who is employed by, or who has received an offer of employment from, a facility on the date on which the individual begins a Basic Nursing Assistant, Developmental Disabilities Aide, Basic Child Care Aide or Habilitation Aide training program may be charged for any portion of the program (including any fees for textbooks or other required course materials).

This provision applies whether the facility requests Medicaid reimbursement for the training, the individual fails the competency exam or leaves employment. Link to the code: <u>Administrative Code -- Reimbursement</u>



## **CONTACT EMAILS**

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#### **Operation of Power-Driven Patient Lifts Information**

The Department of Labor (DOL) requires that employers provide a handout to CNAs under 18 years old. Questions about this should be directed to the Department of Labor or to the facility. This is part of the handout from the DOL found at <u>Field Assistance Bulletin No. 2011-3</u>

Assisting in the Operation of Power-Driven Patient/Resident Hoists/Lifts Under the Child Labor Provisions of the Fair Labor Standards Act (United States Department of Labor, 2011). Excerpt from Attachment A)

After you have successfully completed the 75 clock hours of nurse's aide training required by the Federal Nursing Home Reform Act from the Omnibus Budget Reconciliation Act of 1987, or a higher state standard where applicable, and have successfully completed the nurse's aide competency evaluation detailed in the federal regulation found at 42 CFR (Code of Federal Regulations) § 483.154, or a higher state standard where applicable, you may perform the following tasks while assisting an adult employee in the operation of power- driven patient/resident lifting devices:

- You may set up, move, position, and secure unoccupied lifting devices by yourself.
- You may only assist in the lifting or transferring of patients/residents using power-driven hoist or lifts as part of a trained team that is led by an adult employee.
- You may never engage in such activities by yourself until you are at least 18 years of age. As the junior member of the lifting team, you may assist a trained adult employee while he or she is engaged in attaching slings to and un-attaching slings from lifting devices prior to and after the lift/transfer of the patient/resident is completed.
- You may assist a trained adult employee in operating the controls that activate the power to lift/transfer the patient/resident.
- You may act as a spotter/observer and may position items such as a chair, wheelchair, bed, and commode under the patient/resident who is being lifted/transferred.
- You may assist a trained adult employee when he or she is simultaneously engaged in "hands on" physical contact with the patient/resident during the lifting/transferring process, such as placing or removing the sling, including pushing or pulling the sling under/around the patient/resident; adjusting the sling under/around the patient/resident; and manipulating the patient/resident when placing, adjusting, or removing a sling under/around the patient/resident.
- You may assist a trained adult employee while the adult employee is simultaneously engaged in manipulating, guiding, rotating, or otherwise maneuvering the patient while the patient is being lifted/transferred.
- You may assist a trained adult employee while the adult employee is simultaneously pushing, pulling, or rotating lifting devices when the device is engaged in the process of lifting/transferring a patient/resident.
- You may only assist in the "hands-on" activities discussed above and may not engage in them by yourself.

#### Reference

U.S. Department of Labor, Wage and Hour Division. (2011). Assisting in the operation of power-driven patient/resident hoists/lifts under the Child Labor Provisions of the Fair Labor Standards Act. Retrieved from <a href="https://www.dol.gov/whd/FieldBulletins/fab2011\_3.htm">https://www.dol.gov/whd/FieldBulletins/fab2011\_3.htm</a>