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**Date:** September 22, 2003 BQA Memo 03-012  
**To:** Nurse Aide Training Programs NATP – 04  
**From:** Susan Larsen, Interim Chief  
Caregiver Regulation and Investigation Section  
**Via:** Susan Schroeder, Director  
Bureau of Quality Assurance

**Wisconsin Nurse Aide Program Monitoring**

Federal regulations delegate oversight and enforcement of the nurse aide regulatory requirements to each State. In Wisconsin, the Department of Health and Family Services, Bureau of Quality Assurance (BQA) is responsible for the oversight of the nurse aide program, which includes the approval and monitoring of nurse aide training programs, the oversight of the nurse aide testing program and the administration of the Wisconsin Nurse Aide Registry.

BQA reviews the curriculum of each approved training program every 24 months following the program's approval date to determine whether the program continues to satisfy the required standards. BQA may suspend or revoke the approval of a training program or impose a plan of correction if the program does not satisfy the required standards or operates under conditions other than those contained in the program's approved application. BQA recognizes that a thorough, detailed review of nurse aide programs is necessary to:

- Ensure that each nurse aide included on the Registry is adequately trained and tested to meet the minimum competency requirements established by federal and state law; and
- Ensure the accuracy and completeness of nurse aide training and testing program records.

The purpose of this memo is to introduce the revised [Nurse Aide Program Onsite Review Protocol](#) for monitoring nurse aide training programs in Wisconsin.

**Federal Nurse Aide Training Report Recommendations**

In early 2002, the Federal Office of Inspector General (OIG) collected data about the State nurse aide training programs. The [Nurse Aide Training](#) report issued in November 2002 found that nurse aide training has not kept pace with nursing home industry needs. Teaching methods are often ineffective and clinical exposure is too short and unrealistic. The report recommended that nurse aide training and competency evaluation program requirements be improved to ensure the content of the curriculum and testing remains relevant to today's resident care needs. The report also indicated that nurse aide retention problems are frequently tied to poor training practices. The CMS response indicated they intend to develop specific policy and programmatic options for improving the administration of nurse aide training

programs and more closely evaluate State nurse aide Registry processes and systems. The complete Nurse Aide Training report may be accessed at <http://oig.hhs.gov/oei/reports/oei-05-01-00030.pdf>.

### **Nurse Aide Program Onsite Review Protocol**

Due to nurse aide training and testing program irregularities and budget deficit concerns, the Bureau determined it was necessary to administer one statewide, standardized competency test, thus allowing an increased focus on monitoring nurse aide training programs.

Following the implementation of the standardized competency evaluation program, BQA enhanced the nurse aide training program monitoring process to reflect federal OBRA 1987 recommendations, resulting in a more thorough onsite review. The goals of the enhanced nurse aide program monitoring are to ensure that:

- Training records (and testing records prior to implementation of the standardized test) reflect that each nurse aide included on the Registry has been trained and tested according to federal and state regulations; and
- Programs are held accountable to their approved training curriculum.

The attached [Nurse Aide Program Onsite Review Protocol](#) includes the following documentation:

- Pre-Survey Information form (Personnel, Instructional Program, Facility);
- Student Checklist;
- Follow-Up Activities;
- Primary Instructor Interview Questions;
- Student Interview Form; and
- Onsite Review Assessment.

The announced Onsite Review requires the instructional program to complete the Pre-Survey Information form and collect additional documentation prior to the review. The onsite review verifies current:

- Program content (course outlines, lecture notes, lesson plans, skills checklist, etc.);
- Program policies;
- Course calendar;
- Primary Instructor qualifications;
- Classroom and clinical site specifications;
- Attendance records; and
- Student evaluations of program and instructor.

In addition to a review of the program curriculum records, the comprehensive monitoring process includes a review of 10 percent of randomly selected student records (minimum of five records, maximum of 100 records) from the bi-annual review period, using the Student Checklist form. The student record review involves re-grading training and competency evaluation tests and a thorough examination of the skills evaluation. This review ensures that individuals included on the Registry meet the federal and state training requirements. If discrepancies are uncovered during this record review, additional student records will be reviewed.

The nurse consultant gathers information about clinical sites and other contractual arrangements. An onsite review of the clinical site is completed. The goal is for the nurse consultant to observe the nurse aide training program while in session. Follow-up activities include interviews with the primary

instructor, interviews with nurse aide students and an exit interview with the primary instructor and administrator.

When BQA receives a training program complaint, the onsite review follows the same protocol except that it is unannounced. This onsite review protocol was piloted in October 2002 as part of the nurse aide training program bi-annual survey process. The changes have positively impacted the process by ensuring a more thorough review of program compliance statewide.

Overall, the revised nurse aide program monitoring has meant a longer, more detailed onsite review process, but the consistent monitoring of nurse aide training programs is essential for primary instructors, facilities and nurse aides if quality training is to be attained. Improving the quality of training and providing neutral, objective testing ensures the integrity of the Nurse Aide Registry, which ultimately means increased nurse aide retention and better care for residents.

Since piloting the enhanced Onsite Review process in October 2002, 31 nurse aide training programs have been reviewed using the Nurse Aide Program Onsite Review Protocol. Of those 31, 20 programs were deficiency free and 11 programs were issued statements of deficiency requiring the program to submit a plan of correction (2 programs voluntarily withdrew). Deficiencies noted most often have included the failure to:

- Maintain student records, including attendance records for three years;
- Accurately complete the skills checklist by initialing and dating each skill to verify compliance; and
- Complete course evaluations.

The exit interview with the primary instructor and administrator provides an opportunity to clarify program requirements and provide technical assistance. Program feedback has been positive due to the thoroughness of the comprehensive monitoring review. The plan of correction provides the training program with an opportunity to address the identified deficiencies. The Bureau may modify the statement of deficiency citations based on the program's response.

### **Questions or Comments**

The Wisconsin Nurse Aide Training Program & Registry Manual provides detailed information about the nurse aide training and competency evaluation program regulations and the Nurse Aide Registry in Wisconsin. This manual is intended to assist nurse aide training program instructors, competency evaluation program examiners and nurse aides in understanding their roles and responsibilities under s.146.40, Stats. and Chapter HFS 129 of the Wisconsin Administrative Code. See Chapter 2 of The Wisconsin Nurse Aide Training & Registry Manual at <http://dhfs.wisconsin.gov/caregiver/publications/NATDMan.htm> for nurse aide training program requirements.

Please contact Cindy Geist, Nurse Consultant, at (608) 243-2083 if you have questions about:

- Federal or state nurse aide requirements;
- Nurse aide program monitoring; or
- Training program technical assistance.

[Attachment](#)