



DIVISION OF QUALITY ASSURANCE
1 WEST WILSON STREET
P O BOX 2969
MADISON WI 53701-2969

Jim Doyle
Governor

Karen Timberlake
Secretary

State of Wisconsin

Department of Health and Family Services

Telephone: 608-266-8481
FAX: 608-267-0352
TTY: 888-241-9432
dhfs.wisconsin.gov

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DQA Memo 08-012

To: Nursing Homes

NH 08

From: Paul Peshek, Director
Bureau of Nursing Home Resident Care

Via: Otis Woods, Administrator
Division of Quality Assurance

Medication Aide Training Waiver for Facilities With a Nurse Aide Training Prohibition

Background

Medication aides in nursing homes are nurse aides listed on the nurse aide registry who have successfully completed a Department-approved medication aide training program. Department-approved medication aide training programs have both classroom training and hands-on, practical-experience portions.

The medication aide training program is considered nurse aide training requiring practical experience administering medication in nursing homes. For many years, the Division of Quality Assurance's interpretation has been that any substandard quality of care citations that resulted in a Nurse Aide Training and Competency Evaluation Program (NATCEP) prohibition would also bar the medication-aide, practical-experience portion of the training from occurring in the cited facility. Recently, this latter prohibition has been revisited.

This memo details the circumstances under which medication aide training can be allowed in facilities with an NATCEP prohibition (an enforcement action taken when a facility has citations for substandard quality of care). A NATCEP prohibition forbids a facility from conducting a nurse aide training and competency evaluation program.

NATCEP Prohibition Exception for Medication Aide Training

- A. Each Department-approved medication aide training program will require the prospective student to confirm that the facility at which the student will be conducting the practical experience training does not have the NATCEP prohibition. Students can obtain this information from the nursing home administrator.

- B. If (1) the proposed training site has no prohibition, (2) the candidate begins the medication aide training, and (3) the training site receives a NATCEP prohibition after the student begins the training program, the student is allowed to complete the training at that site.
- C. If the proposed training site has a NATCEP prohibition, the facility can request a training waiver to conduct the medication aide practical experience training. Citations that result in the NATCEP prohibition will be reviewed. The DQA will determine if the citations that result in the NATCEP prohibition were related to medication administration. If it is determined that the NATCEP prohibition was related to medication administration, the waiver to allow the practical-experience training at the facility will be denied.
- D. Facilities with the NATCEP prohibition, that are having medication aide training completed at their facility, may request a training site waiver by submitting a request to the Division of Quality Assurance. After consulting with the Office of Caregiver Quality, Bureau of Nursing Home Resident Care, and the Bureau of Technology, Licensing and Education, the Division will issue a written decision within 30 days either approving or denying the request.

If you have any further questions, please contact Doug Englebert at (608) 266-5388.