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**To:** Feeding Assistant Training Programs NATP – 05  
Facilities for the Developmentally Disabled FDD – 10  
Nursing Homes NH – 15

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Division of Quality Assurance

**Wisconsin Feeding Assistant Training Program Update**

The Department has recently received a number of questions as to whether licensed health care professionals are required to complete a feeding assistant training program prior to assisting residents, who have no feeding complications, with the activities of eating and drinking. This memo provides clarification as to what extent the training requirement in [42 CRF 483.75\(q\)](#) applies to licensed health professionals as defined in [42 CFR 483.75\(e\)\(1\)](#).

A health professional working at a facility must not feed residents unless the health professional has received appropriate training relating to feeding, either in conjunction with the education for his or her professional licensure or by successfully completing State-approved training for a paid feeding assistant.

This memo contains important information on the following topics:

- Definition of Licensed Health Professional;
- Purpose of Feeding Assistant;
- Feeding Assistant Training Requirement Clarification; and
- Feeding Assistant Program Resources.

**Definition of Licensed Health Professional**

The definition of licensed health professionals in [42 CFR 483.75\(e\)\(1\)](#) includes physicians, physician assistants, nurse practitioners, physical, speech, or occupational therapists, physical or occupational therapy assistants, registered professional nurses (RNs), licensed practical nurses (LPNs), and licensed or certified social workers. They are distinguished from a nurse aide as defined in [42 CFR 483.75\(e\)\(2\)](#). The nurse aide definition excludes a feeding assistant.

## **Purpose of Feeding Assistant**

The purpose of the feeding assistant is to supplement nurse aides and licensed nursing staff. Section 42 CFR 483.35(h)(2) requires feeding assistants to be supervised by RNs and LPNs. The requirement to complete a State-approved training program for feeding assistants under 42 CFR 483.75(q), does not, therefore, apply to LPNs, RNs, or nurse practitioners.

“Paid feeding assistant” means a person who meets the requirements specified in 42 CFR 483.35(h)(2), and is paid by the facility to assist residents who have no complicated feeding problems with the activities of eating and drinking. Complicated feeding problems include, but are not limited to: difficulty swallowing, recurrent lung aspirations, and tube or parenteral/IV feedings. The feeding assistant is not permitted to provide any other nursing or nursing related service. Paid feeding assistants must be at least 16 years old. Facilities are prohibited from counting paid feeding assistants toward their minimum staff requirements.

## **Feeding Assistant Training Requirement Clarification**

A health professional working at the facility may not feed residents unless the health professional has received appropriate training relating to feeding, either in conjunction with the education for his or her professional licensure or by successfully completing State-approved training for a paid feeding assistant. Section 42 CFR 483.75(q) specifies the training requirements for feeding assistants.

In comments published with the final regulations, CMS stated facilities may consult a speech-language pathologist, i.e., a speech therapist, when a resident is suspected to have, or is at risk for, swallowing difficulties. This response implies that a speech therapist/speech-language pathologist would have received appropriate training relating to feeding in conjunction with the education for his or her professional licensure. If the speech therapist/speech-language pathologist’s training included feeding and swallowing issues as part of their training for licensure, then this individual would be able to assist appropriate residents with the activities of eating and drinking without first completing a feeding assistant training program.

The same would be true of physicians, physician assistants, physical or occupational therapists, physical or occupational therapy assistants, and licensed or certified social workers. They may assist residents who have no feeding complications with the activities of eating and drinking without first completing a feeding assistant training program, if the curriculum they completed for their health professional credential included training comparable to the training for a feeding assistant. If, however, the curriculum for their health professional credential did not include training comparable to the training for a feeding assistant, they would need to successfully complete the training for a paid feeding assistant before feeding residents.

## **Feeding Assistant Program Resources**

Please access the website at <http://dhfs.wisconsin.gov/caregiver/FeedingAssistant/FeedingAsts.htm> for complete information.

If you have any questions, you may also contact the Office of Caregiver Quality at (608) 261-8319, or [DHFSCaregiverIntake@wi.gov](mailto:DHFSCaregiverIntake@wi.gov)