

## On-Site Observation and Work Credit Frequently Asked Questions:

### **FOR NURSE AIDES**

**1. I am a nurse aide who has received full credit (75 hours or more covering all required topic areas) for on-site observation and have worked in a licensed Massachusetts nursing home during the period from the start of the State of Emergency in Massachusetts (3/10/20) through June 6, 2022. What must I do to become a Certified Nurse Aide?**

In addition to receiving full credit for working 75 hours or more covering all required topic areas, you must take and pass the Nurse Aide Training Competency Exam to become a Certified Nurse Aide (CNA). For you to register for the exam, the Director of Nursing or Staffing Director at the nursing home must submit the completed DPH *On-Site Observation and Work Credit Attestation Form* directly to the Prometric MA Nurse Aide address (see below). Attestation Forms submitted by CNA candidates will not be accepted. CNA candidates who have completed the 75 hours of on-site observation and work credit are encouraged to schedule and take the exam as soon as possible.

Once your completed attestation form has been submitted, you may register to take the exam at: [www.prometric.com/nurseaide/ma](http://www.prometric.com/nurseaide/ma), by downloading the Nurse Aide Test Application and submitting the completed application to: Prometric MA Nurse Aide, 7941 Corporate Drive, Nottingham, MD 21236. **On the testing application, the candidate should enter code "WCA2022" where program information is requested.** Arrive early to the exam site on testing day with the required documentation (listed on the testing application) and the identification used to verify your name and address with the nursing home. Upon passing both parts of the test (Knowledge and Skills), you will become a Certified Nurse Aide (CNA) in Massachusetts.

**2. I am a nurse aide who has received partial credit (less than 75 hours or training that does not cover all required topic areas) for on-site observation and have worked in a licensed Massachusetts nursing home during the period from the start of the State of Emergency in Massachusetts (3/10/20) through June 6, 2022. What must I do to become a Certified Nurse Aide?**

Nurse aides with partial credit must complete their remaining training for a total of 75 hours or more, including training on all curriculum topics with an approved nurse aide training program in order to be eligible to take the Nurse Aide Training Competency Exam. Nurse aides employed by a facility must pass the exam by October 6, 2022 (i.e. within four months of the expiration of the CMS 1135 waiver on June 6, 2022) to become a Certified Nurse Aide (CNA).

Additional training for nurse aides with partial credit must be coordinated by the nursing home or the individual nurse aide with an approved training program. Once the nursing

home or the nurse aide has identified a training program at which to complete training, the attestation form for partial credit must be submitted directly to the training program by the nursing home. Attestation forms will not be accepted by training programs directly from the CNA candidates. Questions regarding the completion of any remaining training should be directed to the specific training program.

**3. I have partial credit (less than 75 hours or training that does not cover all required topic areas) for on-site observation and work done as a nurse aide. How do I find a training program to complete the remaining hours of training and topics not covered while working?**

The Department is unable to recommend a specific training program, but a list of approved training programs is online at: [Department-approved Nurse Aide Training Programs](#)

**4. I am a nurse aide who is currently working in a nursing home. I have received either full credit (75 hours or more covering all required topic areas) or partial credit (less than 75 hours or training that does not cover all required topic areas) for on-site observation and have worked in a licensed Massachusetts nursing home during the period from the start of the State of Emergency in Massachusetts (3/10/20) through June 6, 2022. When must I take and pass the test in order to continue working as a CNA?**

The Centers for Medicare and Medicaid Services (CMS), under its 1135 authority during the COVID-19 pandemic, waived the requirement that nurse aides complete training and testing within four months of being hired. With the ending of the federal waiver, the deadline for nurse aides currently working in a nursing home to complete training and testing is October 6, 2022 (i.e. four months from the expiration of the CMS 1135 waiver on June 6, 2022).

**5. I am a nurse aide who is not currently working in a nursing home who has received either full credit (75 hours or more covering all required topic areas) or partial credit (less than 75 hours or training that does not cover all required topic areas) for on-site observation and worked in a licensed Massachusetts nursing home during the period from the start of the State of Emergency in Massachusetts (3/10/20) through June 6, 2022. How long will I have to test?**

A nurse aide who is currently not working in a nursing home, but begins working as a nurse aide in a nursing home while the CMS 1135 waiver is in place, must successfully complete the required training and testing for certification no later than four months from the expiration of the CMS 1135 waiver of this requirement, or four months from when they begin working, whichever is later.

Note that testing based on an attestation for full or partial credit for training must be completed by the end of this calendar year (December 31, 2022), regardless of expiration date of the CMS 1135 waiver or when you start working.

**6. My job title at a licensed nursing home was “Resident Care Assistant” (RCA). Will my work in that capacity count toward on-site observation and work credit?**

Regardless of your job title, a nurse aide is defined at 42 CFR 483.5 as any individual providing nursing or nursing-related services to residents in a nursing home who is not a licensed health professional, a registered dietitian, or someone who volunteers to provide such services without pay. If the work that you were doing in the nursing home meets the definition of nurse aide, you are eligible for on-site observation and work credit.

**7. I no longer work at the nursing home. Can I receive on-site observation and work credit?**

Yes. Credit is available based on the on-site observations, work done or training provided to any nurse aide working in a licensed nursing home during the period from the start of the State of Emergency in Massachusetts (3/10/20) through June 6, 2022.

**FOR NURSING HOMES**

**1. We are a licensed nursing home in Massachusetts, but our nursing home did not specifically document the time or tasks our nurse aides spent doing on-site observation and working in a licensed Massachusetts nursing home during the period from the start of the State of Emergency in Massachusetts (3/10/20) through June 6, 2022. Can we attest to the training of our aides?**

While there is no specific format that is required to document learning obtained through on-site observation and work experience, a facility is required to attest to hours of training or training for required topic areas they know were completed with that nurse aide. A facility can attest to the 21 hours of the required clinical experience based on payroll records.

**2. Some of our nurse aides completed training online on some of the specified curriculum topics. Can that training count towards on-site observation and work credit?**

Yes. Credit may be given for online training done by an individual while working as a nurse aide, as the training requirements do not specify how the training must be delivered.

**3. The attestation form requires our nursing home to verify the identity and address of the nurse aide. How do we do that?**

There is no specific method that is required to verify the nurse aide's identity and address. Nursing homes should note what form of identification was used for verification (for example, but not limited to, a government issued ID card or driver's license). This will allow the testing program to verify using the same form of identification. **You are not required and should not enter the nurse aide's driver's license number or other personal information such as a social security number.**

**4. Our nursing home does not have an approved nurse aide training program. Can we still attest to on-site observation and work credit?**

Yes. Credit is available based on the on-site observations, work done, or training provided to any nurse aide working in a licensed nursing home during the period from the start of the State of Emergency in Massachusetts (3/10/20) through June 6, 2022

**5. Our nursing home currently has a prohibition on operating an approved nurse aide training program. Can we still attest to on-site observation and work credit?**

Yes. Credit is available based on the on-site observations, work done, or training provided to any nurse aide working in a licensed nursing home during the period from the start of the State of Emergency in Massachusetts (3/10/20) through June 6, 2022.

**6. We are a long-term care or residential facility, but not a licensed nursing home. Can we attest to on-site observation and work credit?**

No. Credit is only available to individuals for work done as a nurse aide in a licensed nursing home.

**7. What happens if a candidate fails the Nurse Aide Training Competency Exam?**

Candidates are allowed four opportunities to pass the knowledge test and three opportunities to pass the clinical skills test. Candidates who test based on an attestation for full or partial credit for training who do not pass the test in the allowed number of times must take and successfully complete a nurse aide training course with a [Department-approved Nurse Aide Training Program](#) before taking the test again.