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**Memorandum**

**TO:** Nursing Home Administrators and Nurse Aide Training Program Coordinators

**FROM:** Elizabeth D. Kelley, MPH, MBA, Director  
Bureau of Health Care Safety and Quality

**SUBJECT:** Resumption of Certified Nurse Aide (CNA) Testing

**DATE:** October 28, 2020

The Massachusetts Department of Public Health (DPH) continues to work with state, federal and local partners on the outbreak of Coronavirus Disease 2019 (COVID-19), caused by the virus SARS-CoV-2, and we continue to appreciate the essential role you have in responding to this evolving situation.

This is to notify interested parties that DPH is authorizing its testing vendor, the American Red Cross (ARC), to resume Certified Nurse Aide (CNA) testing on or about December 1, 2020.

To alleviate potential staffing shortages, the Centers for Medicare and Medicare Services (CMS) temporarily waived the section of its regulation that prohibits a nursing home from employing anyone as a nurse aide for longer than 120 days unless the aide has met the training and certification requirements at 42 CFR 483.35(d).<sup>1</sup> DPH has likewise temporarily waived the state requirement that nurse aides complete training with an approved nurse aide training program within 90 days of hire. In preparation for the eventual revocation of both waivers DPH is permitting CNA testing to resume as outlined below.

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<sup>1</sup> Please note that the CMS waiver does not waive the requirement at 42 CFR 483.35(c), that facilities ensure nurse aides are able to demonstrate competency in skills and techniques necessary to care for residents' needs, as identified through resident assessments, and described in their plan of care. That demonstration of competency must be in person. In addition, the requirement for appropriate supervision at all times remains in place.

## **Resumption of Testing Activity:**

### Scheduling Testing:

Approved nurse aide training programs with students who have completed training may contact the American Red Cross at (800) 962-4337 or [MATesting@redcross.org](mailto:MATesting@redcross.org) to schedule a test.

Students must have the following in order to test:

1. Proof of Eligibility (one):
  - ✓ Certificate of Completion from approved nurse aide training program or an
  - ✓ Approved Nurse Aide Training Waiver
  - ✓ Expired license or official NAR listing of licensure
2. Photo ID (one):
  - ✓ MA Driver's License
  - ✓ Current Passport,
  - ✓ Military ID
  - ✓ RMV issued photo ID
  - ✓ Permanent Resident Card
3. MA Nurse Aide Testing and Registration Application
4. Admission confirmation provided by the ARC upon registration

The application and the MA Nurse Aide State Testing Guide can be downloaded from the ARC website <https://www.redcross.org/take-a-class/cna-testing/massachusetts-nurse-aide-testing>.

ARC will provide all candidates for testing with information including, but not limited to, the health screening requirements that must be met in order to be admitted to the testing site, restrictions on the number of individuals that will be admitted to the testing site, and what each candidate must bring with them to the testing site.

### Precautions and Testing Changes for Testing Candidates and Testing Sites:

ARC will be implementing measures at the testing site to prevent the spread of infection, including, but not limited to, screening all testing candidates prior to admission and requiring that masks must be always worn at the testing site. Candidates will not be allowed to gather in groups at the test site.

During the knowledge (written) portion of the test, candidates clean their desk prior to the start of the test with products provided by ARC and will be seated at least six feet apart. The number of candidates, plus instructor, per test session shall not exceed what can be accommodated within the six-foot distancing guideline but in no event shall there be more than 12 candidates.

During the clinical (skills or "hands on") portion of the test, candidates will demonstrate competency on mannequins rather than live actors, and only the candidate and the instructor may be in the clinical area.

### **Deadline for Completion of Testing:**

CMS has not announced when the waiver of the requirement to pass the certification test within 120 days of hire will be revoked. Facilities, training programs, and students who have completed training are encouraged to contact ARC once testing resumes to schedule a test. This will ensure that there will be sufficient time to test and become certified prior to the effective date of the revocation of CMS's current waiver on nurse aide testing when it occurs.

### **Resident Care Assistants:**

DPH understands that some facilities have hired employees as Resident Care Assistants, or "RCAs".<sup>2</sup> All individuals working as a nurse aide, including those employees who are in an RCA position, are currently exempt from training and testing requirement. Those individuals who are not currently CNAs, including RCAs, will be required to complete training through an approved training program and successful CNA testing prior to the effective date of CMS revocation of its waiver on nurse aide testing.

DPH strongly encourages all long-term care facilities in Massachusetts to monitor the CMS and CDC website for up-to-date information and resources:

- CMS website: <https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Current-Emergencies/Current-Emergencies-page>
- CDC website: <https://www.cdc.gov/coronavirus/2019-ncov/healthcare-facilities/index.html>

Additionally, please visit DPH's website that provides up-to-date information on COVID-19 in Massachusetts: <https://www.mass.gov/2019coronavirus>.

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<sup>2</sup> Facilities hiring RCAs and individuals working in this capacity are reminded that 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. Nurse aides do not include those individuals who furnish services to residents only as paid feeding assistants.