



To: Licensed Nursing Facilities

Date: May 18, 2022

Subject: Coronavirus Disease 2019 (COVID-19) Lifting of Temporary Blanket Waiver for LTC Facilities, ICF-IID Nurse Aide waiver and Updates: Temporary Nurse Aide Training, CNA training and Certification, and Paid Feeding Assistant Programs

On Friday, March 13, 2020, President Donald Trump declared a national emergency due to coronavirus disease 2019 (COVID-19). U.S. Department of Health and Human Services Secretary Alex Azar issued a section 1135 blanket waiver and Governor Tate Reeves declared a state of emergency for the state of Mississippi. As a part of the state's preparation and response to COVID-19, the Mississippi State Department of Health announced several temporary emergency blanket waiver changes to protect the health and safety of Mississippians. This impacted certified nurse aides (CNAs), CNA candidates, Temporary Nurse Aides (TNAs) paid feeding assistants (PFAs) and health care providers.

These emergency blanket waiver changes were a part of MSDH's ongoing efforts to stop the spread of COVID-19 and other respiratory viruses in Mississippi. These temporary policy changes are now being lifted for skilled nursing facilities/nursing facilities, ICF-IID's, inpatient Hospices and end-stage renal disease (ESRD) facilities.

Temporary Nurse Aides

In March 2020, the Centers for Medicare and Medicaid Services (CMS) waived the requirements at 42 CFR 483.35(d) [with the exception of 42 CFR 483.35(d)(1)(i)], which required that a skilled nursing facility (SNF) and a nursing facility (NF) not employ anyone for longer than four months unless they met the training and certification requirements under §483.35(d). To ensure the health and safety of nursing home residents, CMS did not waive 42 CFR § 483.35(d)(1)(i), which required facilities to not use any individual working as a nurse aide for more than four months, on a full-time basis, **unless that individual was competent to provide nursing and nursing-related services**. To meet the competency requirement, nursing facilities **temporarily employed** individuals who have completed alternative training paths which ensured that such individuals were competent to provide relevant nursing and nursing-related services. Such **Temporary Nurse Aides** or **TNAs, had to complete an eight-hour training program**, which could



be conducted on-line and **receive at least eight hours of clinical training** in a simulation environment, or in health care facility under the direction of an RN. A skills check off, was to be kept in the facility, and was also **required** to be completed to assure competency prior to, the Temporary Nurse Aide being allowed to perform nursing assistant tasks. They were also to be paired with Certified staff while training.

The nursing facility was required to send a list of any Temporary Nurse Aides hired under this waiver program weekly, to the MS State Dept. of Health CNA Coordinator. If the worker terminated for any reason, the CNA Coordinator was also to be notified.

Lifting of the Temporary Blanket Waiver - According to QSO-22-15-NH issued by CMS, The Pandemic waiver for Temporary Nurse Aides will cease as of June 7, 2022, and all Temporary Nurse Aides who were working in that capacity will have 4 months (Until October 7, 2022) to “Bridge” to a Certified Nurse Aide Status to be able to continue to work in Certified Long-Term Care (LTC) facilities.

Eight hours (8) credit has been given for the on-line course which has been offered by American Health Care Association (AHCA), and National Center for Assisted Living (NCAL). **Forty Hours (40)** has been given for the skills check off portion, which is included on the MSDH website, and needs to be signed off on by a Registered Nurse who has observed the TNA performing the skill. Temporary Nurse Aides have been allowed to perform duties after they have been observed to show **competence** in performing the assigned duty. The **remaining 27 hours** will be classroom time.

The curriculum needs to include **27 hours** of classroom training in the areas defined at 42 CFR §483.152(b), such as respecting resident rights, basic nursing skills, personal care skills, and caring for cognitively impaired residents. A full list is included on the MSDH Website. The same new hire orientation on Abuse/Neglect/Misappropriation/Vulnerable Adults Act would also be required.

Testing

To bridge successfully from TNA to Certified Nurse Aide (CNA) Status, the TNA must meet the requirements at 42 CFR §483.154(b)(i) and (ii) which requires these nurse aides pass a written or oral exam, and demonstrate skills learned. It is required that TNA’s take a 2-part test offered by Credentia, the contract company which is used by the State of Mississippi. They must perform successfully 1) a written or oral test, and 2) skills check off to be eligible for Certification in the State of MS.



If the TNA has **completed a training program**, and is now ready to test with Credentia, then they should contact Credentia at the [Credentia.com](https://www.credentia.com) website. They should follow the instructions for the **TNA testing application**, and submit the required documentation to include:

- ~Temporary Certificate of completion of the 8-hour On-line Course.
- ~Skills check off signed by a facility RN (provided on MSDH Website).
- ~Copy of Certificate of Completion of Bridge Program 27 hours of classroom Instruction. (Facility creates Certificate).
- ~Attestation signed by Facility DON on facility letterhead that the TNA has completed all steps to sit for examination. Credentia will send the State CNA Coordinator all documents received for her review. If all are in order, then she will approve Credentia to notify the TNA that they are ready to test and can schedule a testing time. Testing of TNAs must be applied for prior to October 7, 2022 when the TNA Bridge program will end.

CNA Training and Certification

Programs that are currently being taught at community colleges and proprietary schools may now hold classes **onsite**, or online through distance education learning. CNA Course instruction must equal the minimum required **75 total hours**.

Clinical instruction: MSDH will allow CNA candidates to receive clinical skills training in a simulation environment, or in an approved health care facility under the direction of a Registered Nurse (RN). Clinical instruction must equal the required **16 hours**.

MSDH is asking all nursing homes that are listed as clinical sites for nurse aide training programs, to grant the students access into the facility for clinicals. The nursing home will screen the students in training, just as they would their regular employees.

MSDH provides a list of approved training courses for Nurse Aides on request. You can request a list of MSDH-approved nurse aide courses by emailing antanikah.robins@msdh.ms.gov.

CNA Candidates

CNA Candidates are those individuals who have completed an approved CNA program and have not yet been able to receive testing by Credentia due to issues with scheduling. These individuals will be allowed to work in facilities beyond their 120-day window, until such time as the next available testing can be arranged by Credentia. Documentation



must be maintained on attempts to schedule testing dates. The CNA program may be one provided by an approved facility, or one taught at a community college or proprietary school.

****We are aware that there may be instances where the volume of aides that must complete a state approved NATCEP exceed the available capacity for enrollees in a training program or taking the exam. This may cause delays in in nurse aides becoming certified. If a facility or nurse aide has documentation that demonstrates their attempts to complete their training and testing (e.g., timely contacts to state officials, multiple attempts to enroll in a program or test), a waiver of these requirements (42 CFR §483.35(d)) is still available and the aide may continue to work in the facility while continuing to attempt to become certified as soon as possible. ****

Reciprocity

The Mississippi Department of Health Licensure and Certification will continue to honor reciprocity for CNAs. Reciprocity is a process by which a Certified Nurse Aide from another state may qualify for certification in Mississippi by virtue of his/her status in that other state. An individual is only eligible for reciprocity if he/she has been entered on a nurse aide registry in a state, other than Mississippi in accordance with the training and competency evaluation requirements of OBRA '87, as amended, and if the individual is currently listed on that state's nurse aide registry as **ACTIVE and in good standing**. You must apply for reciprocity in Mississippi, however, if the CNA can provide documentation of their active Certification, then they may operate temporarily as a CNA in Mississippi under the blanket waiver provided there are no findings of abuse or neglect on any Nurse Aide registry. Since we are at the **end of the blanket waiver**, CNA's from other states must officially apply for reciprocity in Mississippi. This can be done by requesting a Reciprocity Application Form from www.PearsonVue.com.

Paid Feeding Assistant Programs:

Applications are still being accepted for the Paid Feeding Assistant Program during this time.



MSDH Licensure and Certification will extend current PFA program recertifications.

MSDH Licensure and Certification will grant approval to nursing facilities seeking initial certification upon a desk review of training materials and required documentation.

Contact

For further Information regarding the Certified Nurse Aide program, the Temporary Nurse Aide program or Paid Feeding Assistant Program, contact Antanikah Robbins, CNA Coordinator, at 601-364-2718 or 601-364-1100, or antanikah.robbins@msdh.ms.gov.