



May 23, 2022

Dear Skilled Nursing Facility Administrator,

On behalf of the Pennsylvania Departments of Human Services (DHS), Education (PDE), and Health (DOH), the three agencies that jointly administer the Act 138 Temporary Nurse Aide Pathway (TNA Pathway), we are writing to inform all Skilled Nursing Facilities (SNFs) and Temporary Nurse Aides (TNAs) of the next steps as it relates to the TNA Pathway in Pennsylvania.

It is important that you share the following information with your TNAs as soon as possible.

On April 7, 2022, the Centers for Medicare and Medicaid Services (CMS) published [QSO-22-15-NH & NLTC & LSC](#) and provided notice that the temporary emergency declaration blanket waiver for Training and Certification of Nurse Aides for SNF/NFs – 42 CFR § 483.35(d) will be terminated in 60 days. This waiver has allowed the TNA Pathway in Pennsylvania. In accordance with the CMS notice, this letter serves as notice that SNFs in Pennsylvania will no longer be allowed to hire TNAs after June 6, 2022, due to the expiration of the CMS waiver.

In addition, all TNAs in Pennsylvania must successfully pass the skills and written portions of the state nurse aide examination by October 6, 2022, in accordance with CMS regulations. TNAs who do not pass their state nurse aide exam by October 6, 2022, cannot continue to perform the duties of a nurse aide and must stop working as a TNA until they pass their state nurse aide exam. Per state policy, TNAs will have 24 months from October 6 and three attempts to pass both parts of the exam but they cannot work as a nurse aide until they pass the exam and are added to the registry.

TNAs are strongly encouraged to create a profile on the [Credentia CNA365 system](#) and to complete and submit their application to test, including their attestation forms, to Credentia as soon as possible to make sure the form can be reviewed for completeness and accuracy in a timely manner. PDE will continue to review TNA attestation forms through October 6, 2022, and TNAs may continue to test after this date, following state policy. However, TNAs that submit their forms close to or on the deadline may not be able to schedule their tests prior to the waiver ending and risk not being able to work until they complete their exam.

As a reminder, the TNA Pathway process is:

- The SNF provides required online training and on-the-job training to TNA and ensures all the required areas of training per 42 CFR § 483.152(b) are covered through this training. Credentia has provided an online review of the skills exam to help TNAs prepare for testing that can be found here: credentia.com/test-takers/pa. There are many helpful resources to answer questions and help prepare for taking tests that can be found at the bottom of the page in the “Resources” section. Specifically, the [Practice Written Exam](#) and the [Skills Review Presentation](#) may be helpful to prepare for taking the exams.
- After training has been provided, the SNF and TNA sign the attestation form available on the PDE [website](#).

- TNA submits attestation form to Credentia through the Credentia CNA365 system. (For questions about the Credentia portal, scheduling an exam or exam results, contact Credentia at (800) 457-6752 or DHS at ra-pwnurseaide@pa.gov.)
- PDE reviews attestation form to make sure all required information is included and is accurate. If all information is included and accurate, the TNA will receive an email from Credentia with directions on how to register for tests. (For questions about the attestation form contact PDE at ra-edtempnurseaide@pa.gov.)
- TNAs must pass both the written and skills practical tests. There is an online written test that is now available, as well as in-person written exams. We strongly encourage TNAs to take advantage of the online written test.
- Once a TNA passes both the written and skills practical tests, their name will be enrolled on the PA Nurse Aide Registry by DOH. (For questions about the nurse registry contact DOH at 717.787.1816 and ra-dhncfmain@pa.gov.)

As a general reminder to SNFs, CMS reiterated in the April 7, 2022, notice that “poor quality of care, such as improper transfers, turning and positioning, poor incontinent/skin care, or weight loss related to poor assistive dining techniques could be related to inadequate training...” As noted in CMS memorandum [QSO-21-17-NH](#), ‘states must ensure that all of the required areas of training per 42 CFR §483.152(b) are addressed and any gaps in onsite training that are identified are fulfilled through supplemental training.’”

Based on this language and on our shared commitment to ensuring residents receive quality care, we are strongly encouraging all SNFs utilizing the TNA Pathway to keep documentation of how the on-the-job training adequately addresses the components of the required curriculum specified at 42 CFR § 483.152(b). SNFs are also encouraged to ensure that any gaps in onsite training that are identified are fulfilled through supplemental training. The Department of Health will continue to conduct licensing inspections and investigate all complaints, including any complaints received about poor quality of care. In addition, the Department of Health may initiate an unannounced monitoring survey related to quality of care and nurse aide training. Facilities are strongly encouraged to keep documentation of the training provided to TNAs utilizing the TNA Pathway.

We recognize that there have been challenges with statewide availability of nurse aide exams and remain committed to working together to address these challenges. We will continue to monitor the statewide testing capacity and progress of TNAs to complete their tests. SNFs are strongly encouraged to take all steps possible to support TNAs in preparing for and completing their state nurse aide exams, including taking advantage of the online written test option now available through Credentia. Online written/oral exams are available all days of the week and throughout the day, which greatly increases the availability of testing opportunities. We continue to work closely with Credentia to increase in-person skills testing capacity. Credentia has taken multiple steps to increase testing capacity, including asking Regional Testing Sites and In-Facility Testing Sites for increased test events, increasing hiring staff and job ads to better recruit registered nurse evaluators, and increasing evaluator compensation and referral bonuses.

SNFs are invited to participate in two webinars hosted by Leading Age and the Pennsylvania Health Care Association (PHCA), including our agencies and Credentia, the contracted testing provider, to review the testing process and to discuss best practices for supporting TNAs through the testing process. The webinars will be recorded and publicly available. Webinars are scheduled for May 26, 2022, from 1:30 – 2:30 p.m. ET and May 27, 2022, from 12:00 – 1:00 p.m. ET.

Please use this link to register for Thursday, May 26, 2022, from 1:30 – 2:30 p.m.:

https://my.leadingagepa.org/NC_Event?id=a018W00000VxyPCQAZ

Please use this link to register for Friday, May 27, 2022t, from 12:00 – 1:00 p.m.:

https://my.leadingagepa.org/NC_Event?id=a018W00000VxyPqQAJ

Finally, we are also inviting all SNFs to participate in a voluntary survey to help us determine the total number of TNAs that are working in facilities and how many still need to be tested. The survey will be hosted by Credentia and available shortly and will ask facilities to self-report the number of TNAs employed at the facility, the facility location, and whether the TNAs need to take the written exam or the skills exam or both. Participation in this survey will be very helpful as we continue to monitor testing availability and progress of TNAs completing tests.

On behalf of the Wolf Administration, we thank you for your ongoing commitment to caring for some of the most vulnerable Pennsylvanians, who are also our family members, loved ones, and neighbors, during these unprecedented and challenging times.

Sincerely,



Meg Snead
Acting Secretary
Department of Human Services



Eric Hagarty
Acting Secretary
Department of Education



Dr. Denise Johnson
Acting Secretary
Department of Health