

# Biennial Nurse Aide Training Program Onsite Reviews

Population Served: 226 programs statewide, training over 9,500 aides annually. (July 2012)

## PLAN

### 1) Getting Started

- The Nurse Aide Registry (NAR), contracted by the Centers for Medicare & Medicaid Services, reviews and approves Nurse Aide Training Programs (NATP). The Code of Federal Regulations (CFR) at Title 42, Section (§) 483.151(b)(1) (iii), requires onsite reviews for other than the initial review. The State may not grant approval of a NATP for a period longer than 2 years, Title 42 CFR § 483.151(d).
- Public Health Accreditation Board Standard 6.3.2(A) requires programs with IFMs to document compliance. Programs must provide a database or log of inspection reports with action taken, current status, follow-up, return inspections and final disposition.

### 2) Assemble the Team

The Health Resources Service Chief, NAR Program Director, Health Facility Surveyor who serves as inspector, and a member of NAR staff were the core team; others supporting the initiative were the Deputy Commissioner of Protective Health Services and the Service Finance and Human Resources liaisons.

### 3) Examine the Current Approach

- Biennial onsite review was tracked but not a program priority.
- Database issued reports of overdue onsite reviews.
- No policy for scheduling onsite reviews to ensure they are scheduled at a frequency consistent with the IFM.
- No system to track when reviews of NATPs are needed.
- No defined responsibilities for monitoring the IFM.
- No data for calculating hours required to perform workload.

### 4) Identify Potential Solutions

- Develop a spreadsheet to record NATP approval and review dates and calculate days elapsed.
- Identify NATPs without current approval or review (greater than 730 days since approval).
- NAR Director could assist with onsite reviews as feasible and as other responsibilities allow.
- Request temporary reassignment of NAR staff to assist with onsite reviews.
- Ensure the number of programs needing onsite reviews is correct by calling programs to assess operating status.

### 5) Develop an Improvement Theory

If a spreadsheet records NATP approval and review dates, and is used to calculate days elapsed, and a short term increase in staff hours to perform the onsite reviews for NATPs is approved, then increased review hours can be targeted to perform late onsite reviews, establishing current approvals for all NATPs, while ensuring no more NATPs exceed the IFM. This effort will position the NAR for compliance with the biennial IFM in FY2013 with existing staff.

AIM: By June 30, 2012, current reviews for NATPs will improve from 44% to 100% and the NAR will be positioned for compliance with the biennial IFM in FY2013.

## DO

### 6) Test the Theory

- Created a spreadsheet of all NATPs with required demographics and review dates.
- Contacted programs due for review via telephone. NATPs no longer active were closed.
- Identified 103 NATP sites requiring review in remaining FY.
- Assessed average hours per onsite review to develop staffing needs assessment.
- Requested and received temporary re-assignment of one NAR staff member as a NATP inspector.
- Assigned the Director to assist with onsite reviews.
- Employed proximity scheduling to minimize travel time.

	C	J	L	M	N
		Original Approval Date	Approval Expiration Date	Previous Full Inspection	Last Full Inspection
1	HYPHENATED DESCRIPTOR				
53	Northeast Technology-HS-HHA/LTC-Pryor	6/18/07	01/11/14	06/18/07	01/12/12

- The Director, inspector and re-assigned staff met weekly to schedule onsite reviews based on geographic proximity.

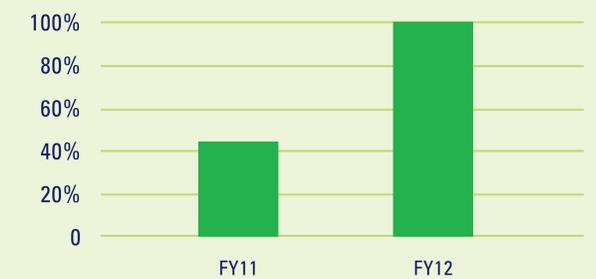
- Finance staff and managers expedited lodging purchase orders to reduce staff financial burden.
- Changes in staff availability were addressed weekly and the spreadsheet and schedule were updated with the review dates.

## CHECK

### 7) Study the Results

The number of reviews performed each month was subtracted from the total number of required inspections to determine the number of inspections remaining. The cumulative compliance rate for the monitored activity is reflected below.

TRAINING PROGRAMS WITH CURRENT APPROVALS



- By June 2012, current approvals for NATPs improved 128%, from 44% to 100% of NATPs approved or reviewed in the last two years.

## ACT

### 8) Standardize the Improvement or Develop New Theory

Review due dates are maintained in the spreadsheet and monitored by the Director. Reviews are scheduled the month prior to expiration of the renewal. Review activity and status are reported monthly to the Chief.

### 9) Establish Future Plans

- Continue to monitor performance and institute audit protocol.
- Incorporate scheduling and tracking function in Oklahoma's developing Enterprise Licensing Management System (AMANDA).

## NURSE AIDE TRAINING PROGRAM · HELPING & HINDERING FORCES IN COMPLYING WITH INSPECTION FREQUENCY MANDATE

### Helping Forces

- Vacant NATP Inspector position filled in Fall of 2011.
- NAR staff have committed to the goal of all NATPs having an inspection within the last two years by June 30, 2012.
- Limited volume of 226 NATPs, with many co-located.
- No competing NATP complaint/incident workload.

### Hindering Forces

- Lack of staffing.
- Lack of clarity on the requirement for program approval to not exceed two years and that an on-site visit is required before approval may be granted.
- The database for training programs did not generate an inspection report or calculate the number of days elapsed since last inspection.
- Inconsistent logging of inspection dates in the database.
- No policy for scheduling inspections to ensure they are scheduled at a frequency consistent with the IFM.
- Lack of sense of responsibility at each level for monitoring status and ensuring IFM is met.
- PMPs did not include compliance with IFMs as a critical accountability
- Limited window for inspections based on class term.

