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October 16, 2020

Dear Ms. Deetz and Ms. Rodat:

On behalf of HCA, HCP and LeadingAge New York (the Associations), thank you again for the clarification and guidance issued in DAL DHCBS 20-09: Personal Care Aide and Home Health Aide Training Program Hybrid Training Approval Process for Department of Health Approved Training Programs.

As you are aware, the Associations' joint proposal regarding the Online Training for Home Health Aides and Personal Care Aides submitted in July 2020 reflected the efforts of a workgroup comprised of providers that operate Department approved training programs. In fact, several of the same individuals who participated in the Department's workgroup that revised the Guide to Operation of a Home Health Aide Training Program in 2013 participated in the Associations' current efforts. Collectively, these individuals have demonstrated knowledge and expertise in conducting training and identifying best practices to ensure a sound, effective and efficient online training approach.

The Associations' proposal reflects many of the same concerns the providers share in common with the Department to ensure that students receive quality training and assessment of skills in order to safely deliver patient care. The workgroup felt strongly that only approved existing training programs should be approved to deliver the training through this hybrid approach.

The Associations have collectively met with provider agencies to solicit their questions and input on the guidance issued in DAL DHCBS 20-09. Providers are enthusiastic and prepared to conduct the Hybrid Model of Virtual Training, However, many have questions and concerns regarding the successful implementation of programs based on the guidance contained in the DAL.

These questions and concerns are addressed throughout the subsequent pages:

Agency Demographics Form

Attachment – 1

[Page 1 and Page 5]

PCATP: Address where testing and skills assessment will be completed

HHATP: Address where testing and SPT will be completed

- Currently, a home health aide program may choose to conduct training at various sites. The site where training occurs is entered into the Home Care Worker Registry by the training program when entering the class roster and other required information for the class. Under the Hybrid Model, and in consideration of the numerous social distancing and space restrictions currently in place because of COVID-19 restrictions, training programs may continue to want to provide training utilizing their various approved sites.
 - How should training programs reflect where SPT will be provided when various sites may be used?
 - Since SPT locations could potentially be different from class to class, how should programs inform the Department of the various sites that may be used for the SPT? Schedules for training are required currently to be submitted to the regional offices every six months on April 1 and October 1. Is this process being changed? Should these schedules continue to be submitted? To the regional offices and the central DOH office?
 - Is a separate application required for each site utilized by a single program?
 - Will programs continue to be responsible for entering the class roster, dates and other required information in the registry? The DAL appears to imply the Department will enter this information.
- Please clarify that this refers to competency testing and/or SPT and not testing on the training modules.

Name of Nurse Instructors Responsible for Online Training

- Nurse Instructors already must submit application to the Department for approval to conduct aide training. Larger programs anticipate that they may use more than one approved nurse instructor who has been appropriately trained and oriented to online instruction methods. Should the training program indicate all nurse instructor names who will be trained for this purpose?
- How should new instructors be submitted to the Department as online nurse instructors as they are hired and trained?

Hybrid training Program Schedule (Attachment 4)

- Currently, the home health aide and personal care aide training program approvals contain comprehensive schedules for all components of training required. Attachment 4 contains a similar schedule. Please clarify that the requested information is only for those components that differ from previously submitted schedules.

Policies and Procedures:

Testing: (page 3, Number 7) How trainees will be scheduled and monitored for in-person testing

- Please confirm that in-person testing refers to assessing a trainee’s competencies and supervised practical training (SPT) competencies. The didactic portion of the curricula requires multiple quizzes after each module. The questions are obtained from a test bank of questions developed by the publisher of the DOH approved textbooks used by training programs and are required to be rotated. Training module testing for home health aide training is comprised of multiple written tests given to students throughout the didactic training. Testing is accomplished through testing after units contained within the modules and at the completion of each module. In-person testing for these didactic portions of the training would require the students to come to training sites multiple times during the training period.

The proposal submitted to the Department proposed and anticipated that these tests would be administered through learning management systems with appropriate protocols and safeguards developed and monitored to ensure the integrity of the testing and the student’s identity. Learning management systems are currently being used by the educational community throughout the state and the nation. Safeguards to protect the integrity of testing in terms of authentication of the student both visually and through nationally standardized security methods are used throughout the educational system. To require students to commute and attend in-person testing multiple times to take module and unit tests during the typical 14-day training period creates an unnecessary barrier to successful implementation of the online hybrid training. Moreover, it completely undermines the goal and negates the benefits of allowing such a training method.

As part of the hybrid model, we feel strongly that, with the proper authentication and necessary verifications, testing on the training modules should be allowed to be conducted online with proper protocols and procedures developed using a learning management system. Our understanding is that DOH supported such online testing based on the August 31st meeting DOH held with the Associations and select home care providers.

Attachment 2 – PCATP Attestation & Attachment 3 -- HHATP Attestation (pages 6 and 7, third bullet)

The Department will be responsible for entering the approved Hybrid Training site into the Home Care Worker Registry (HCWR).

- Please confirm that Hybrid Training site refers to the location of competency testing and/or SPT and not testing on the training modules.
- What happens if an agency has multiple Training sites? Will the DOH enter all of the approved SPT sites?
- Who is responsible for entering the class roster on the HCWR?
 - Will the Department enter the class roster for the Hybrid Training?
- If DOH is entering every Hybrid class and it is not entered by the fifth day (per current regulation), we recommend that the provider could then assume approval.

- What recourse will be offered to providers and trainees if DOH is entering every hybrid training course and it is not entered, or is entered incorrectly?

DOH-approved training programs are currently required to enter site information into the Registry for every training class. We strongly urge that the DOH-approved training program should enter the Hybrid Training site into the Registry and simply designate in the site hybrid training site and address of site. This would streamline data entry; maintain consistency with current requirements; and provide a mechanism for the Department to identify the site as the hybrid online training site. This will relieve the Department of what could become an administrative burden with resultant delays in the start of classes that are vital to addressing a major aide shortage.

Additional Issues

- Please verify that students who fail a module can retake the online courses and retake the test according to policies and procedures developed by the training program that are consistent with current guidelines and approved long standing policies for training programs.

We look forward to your timely response to these questions so that agencies can begin to develop hybrid training programs for home health aides and personal care aides that meet your requirements.

Sincerely,

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