

Onsite Audit

Direct Care Worker (DCW) **Training and Testing Program Audit Tool** **General Instructions**

All DCW Training and Testing Programs must be initially approved by Arizona Health Care Cost Containment System (AHCCCS) to provide training and testing to direct care workers and trainers as outlined in the [AHCCCS Contractor's Operations Manual \(ACOM\), Chapter 400, Section 429](#).

The Approved DCW Training and Testing Program (Approved Program) that will be audited for continuing program approval can be:

- An AHCCCS registered agency that provides direct care services such as attendant care, personal care or homemaker services or
- A private vocational training program.

Educational institutions (e.g., high school, college or university) and private vocational training programs licensed by the Arizona State Board for Private Postsecondary Education are exempt from the initial and continuing program approval requirements if they submit, annually, a signed copy of the *Application for Approval for DCW Training and Testing* form. [ACOM, Chapter 429, III.D.1 & 2](#)

After a DCW training and testing program is approved by the AHCCCS, an ALTCS Contractor (Contractor) will conduct a year one desk audit within 180 days of the initial program approval. AHCCCS will coordinate with the Contractors to determine which Contractor shall conduct the year one audit and subsequent onsite annual audits. AHCCCS may perform audits in lieu of Contractors. An onsite review of an Approved Program, outside of the audit cycle, can be performed at the discretion of AHCCCS, the Contractor or the assigned auditing Contractor. [ACOM, Chapter 429, III.C](#)

The auditor shall provide at least a 30 day advance notice of a scheduled audit. For Approved Programs that also serve as a direct care services agency, Contractors are encouraged to conduct their routine monitoring visits in conjunction with the DCW audits in an effort to reduce administrative burden. Auditors will issue a letter indicating the findings of the audit and the completed report to the Approved Program within 30 days of completing the audit. AHCCCS will update the Approved Programs listing with the audit findings to the AHCCCS website (www.azahcccs.gov/dcw) on a monthly basis. [ACOM, Chapter 429, III.C.2 & 3](#)

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Section 1 - Auditor Information

Line 1a - Auditor Organization: Mark the appropriate box with an “x”

Line 1b - Auditor Name: Enter name of individual conducting audit

Line 1c - Auditor Contact Number: Enter the phone number of the individual conducting the audit

Line 1d - Audit Date: Enter the date the audit was conducted

Section 2 - Audit Criteria

Mark the appropriate box with an “x” for the reason the audit is being conducted

Onsite Audit: Select this box if the Auditor is conducting the onsite audit that occurs annually on the anniversary of the year one audit (+/-2 months).

Other: Select this box if the Auditor is conducting an onsite audit in response to a request from AHCCCS or an ALTCS Contractor.

Section 3- Approved Program Demographic Data

Line 3a - Approved Program Name: Enter name of the Approved Program to be audited exactly as shown on the AHCCCS Approved Program listing found at www.azahcccs.gov/DCW.

Line 3b - AHCCCS ID: Enter the AHCCCS ID number, if the Approved Program is an AHCCCS registered agency that provides direct care services.

Line 3c - AHCCCS Initial Approval Date: Enter the date of the initial program approval initially granted by AHCCCS as noted on the AHCCCS Approved Program listing found at www.azahcccs.gov/DCW. A copy of the approval letter from AHCCCS, provided by the Approved Program, will also suffice as documentation of the initial approval date.

Line 3d - Onsite Audit Location Address: Enter the physical address of the main training location for the Approved Program where the Auditor inspected the space, equipment and supplies utilized to train and test DCWs. The review of pertinent documentation may be conducted in another location such as the main office of the Approved Program.

Line 3e - Contact Name: Enter the name of the Approved Program contact responsible for coordinating the audit and the point of contact for all correspondence pertaining to the audit.

Line 3f - Contact Phone Number: Enter the direct phone number of the Approved Program contact responsible for coordinating the audit

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Line 3g - Contact Mailing Address: Enter the address of the Approved Program contact where written correspondence pertaining to the audit should be mailed

Line 3h - Approved Program Type: Mark the appropriate box with an “x” for the description if the Approved Program

Section 4 - ALTCS Contractor Identification

NOTE: Skip this section if the Approved Program is a private vocational training program.

Mark the appropriate boxes with an “x” for the ALTCS Contractor with which the Approved Program (in the capacity of an AHCCCS registered direct care services agency) is contracted to provide direct care services.

Section 5 - Contracts

NOTE: Skip this section if an Approved Program, designated as an AHCCCS registered direct care services agency, is only training and testing their own direct care workers.

List **EACH** AHCCCS registered direct care services agency that has a contract or agreement with the Approved Program to provide direct care worker training and testing. Provide the corresponding AHCCCS provider ID of, and the counties served by, the direct care services agency.

PROGRAM REQUIREMENTS REVIEW

Instruction for Completing Sections 6 – 9:

Select **Compliant** from the drop down menu (or write in “Complaint”) if the Approved Program meets the requirement(s) for the standard.

Select **Compliant with Recommendations** from the drop down menu (or write in “Compliant with Recommendations”) if the Approved Program meets the requirement(s) for the standard, but there are areas noted that need improvement. Provide a comment for each standard when a recommendation is noted. Briefly explain the reason for the recommendation and/or provide a suggestion for making improvements.

Select **Not Compliant** from the drop down menu (or write in “Not Compliant”) if the Approved Program does not meet the requirement(s) for the standard. Provide a comment for each standard when a corrective action is required. Briefly explain the deficiencies that resulted in the Approved Program’s non-compliance with the required standard. The notice of audit findings shall provide a summary of the deficiencies noted to support the Approved Program in developing and implementing a corrective action plan.

Select **Not Applicable** from the drop down menu (or write in “Not Applicable”) if the requirement is not applicable to the Approved Program. Some requirements are specific to Approved Programs that are direct

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care service agencies and not applicable for Approved Programs that are private vocational training programs.

Section 6 - Policy and Procedures and Resource Standards

An Approved Program must develop and maintain policies and procedures to support the operations of the Approved Training that are consistent with and adhere to the **AHCCCS Contractor's Operations Manual (ACOM), Chapter 429**.

Line 6a - Policy and Procedures for Training Program Structure

The Approved Program shall maintain and implement policies and procedures that ensure adherence to the following content areas related to the overall structure of the training program. **ACOM, Chapter 429, III.A.4**

- Curriculum Standards. **ACOM, Chapter 429, III.A.1**
 - The use of *Principles of Caregiving* curriculum or a curriculum that meets the competencies of the *Principles of Caregiving* curriculum
 - Curriculum developed by the Approved Program adheres to the *Principles of Caregiving Curriculum Use Guidelines* found at www.azahcccs.gov/dcw
 - Processes for ensuring the curriculum is maintained and updated
- Implementation Models or Strategies for Knowledge and Skills-Based Training. **ACOM, Chapter 429, III.A.3**
 - Outline the protocol for the utilization of classroom training
 - Outline the protocol for the utilization of online training
- Trainer Qualifications and Protocols. **ACOM, Chapter 429, III.A.2**
 - Processes for training trainers
 - Processes for testing trainers
 - Processes to ensure trainers have and documentation of hands-on experience in direct care
 - Processes to ensure trainers have and documentation of experience in teaching groups of adults
 - Processes to ensure trainers have and documentation of the minimum number of training classes per year
 - Outline the protocol for the utilization of experts or assistants
- Record Maintenance. **ACOM, Chapter 429, III.A.5**
 - Documentation must be retained for at least six years
 - Processes for ensuring documentation of training and Testing Sessions
 - Class schedules
 - Class rosters for both knowledge and skills-based training and testing
 - Trainers, experts and assistants
 - Processes for ensuring documentation of individual records
 - Date of hire and date the training period concluded
(This is only a requirement for Approved Programs that are also a direct care service agency)

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- Form used to obtain permission from the employee to access testing records in the online database¹
 - Demographic data that is required in order to enter employees and testing records into the online database
 - First Name
 - Last Name
 - Month and Day of Birth
 - Last four digits of the Social Security Number
 - Sex (Male or Female)
 - Training and Testing Modules
 - Accommodations (e.g. oral or alternate language tests)
 - Test type and eligibility for tests (e.g. regular, challenge or re-test)
 - Educational and work experience documentation for challenge tests
 - Results
- Scope of the Program
 - Agreements or contracts with direct care service agencies to train and test their direct care workers
(This is only a requirement for the policies and procedures of Approved Programs that are training and testing direct care workers under an agreement/contract with a direct care services agency)

Line 6b - Policy and Procedures for Test Administration and Verification and Online Database

The Approved Program shall maintain and implement policies and procedures that ensure adherence to the following content areas pertaining to test administration and verification. Test administration and verification guidelines can be found at www.azahcccs.gov/dcw.

- Test Administration. **ACOM, Chapter 429, III.A.3**
 - Utilization of standardized tests provided by AHCCCS
 - Measures utilized to ensure test security
 - Availability of accommodations (e.g. oral or alternate language tests)
 - Outline the protocol for testing (e.g. incremental or “final” tests)
 - Outline the protocol for knowledge and skills-based testing
 - Processes for offering challenge tests
 - Processes for offering re-tests
- Test Verification
 - Protocol for ensuring and documenting trainers (92%) and direct care workers (80%) pass rate for written and 100% pass rate for skills tests. **ACOM, Chapter 429, III.A.3**
 - In the event testing records are not yet available in the online database, a hard copy form can be used for testing record verification. **ACOM, Chapter 429, III.A.5**
 - Protocols for sharing current/former employee testing results upon request from another organization using *Verification of Direct Care Worker Testing forms*²

¹ Obtaining permission to access testing records in the online database is the responsibility of the employer of either the trainer or direct care worker. Approved Programs that are private vocational training programs are only responsible for obtaining permission for accessing the testing records from a new/prospective employee trainer.

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- Protocols for soliciting prospective/current employee testing results from another organization using *Verification of Direct Care Worker Testing* forms. Verification may also include an official transcript from an Approved Program (on letterhead) of the test type(s), date(s), module(s) and score(s).
- Online Database.
 - Protocols for integrating the online database into day-to-day business practices. **ACOM, Chapter 429, III.A.5**
 - Maintaining a list of organizational users and notifying AHCCCS when a user account must be terminated or suspended
 - Protocol for adding employees into the employee listing who will be or have been sent by the employer for training/testing including updating status changes of employees (hired, terminated, resigned) within 30 days of the status change.³
 - Form used to obtain permission from current/prospective employees to access testing records in the online database
 - Protocol for reporting testing results in the online database within 30 days of a testing event

Line 6c - Resources – Access to necessary space to conduct training and testing

An Approved Program must have access to the necessary space to conduct training and testing. The space must be adequate to provide training and testing in the manner prescribed in the Approved Program's policy and procedures. **ACOM, Chapter 429, III.A.3.a**

During the year one audit, Auditors will assess the adequacy of space through either video or photographs of each of the Approved Program's training locations. During the subsequent onsite audits, Auditors will assess the adequacy of training and testing space by visiting the main training and testing location. Additionally, the auditor will review video or photographs of the other training and testing locations to assess the adequacy of space to conduct training and testing.

Line 6d - Resources - Access to necessary equipment and supplies

An Approved Program must have access to the basic necessary supplies and training equipment (e.g., wheelchair, bed) to facilitate skills-based training and testing. A listing of required supplies and equipment for skills-based training and testing can be found at www.azahcccs.gov/dcw. **ACOM, Chapter 429, III.A.3.b**

During the year one audit, Auditors will assess the adequacy of supplies and equipment through either video or photographs of each of the Approved Program's training locations. During the subsequent onsite audits, Auditors will assess the adequacy of supplies and equipment by visiting the main training and testing location. Additionally, the auditor will review video or photographs of the other training and testing locations to assess the adequacy of supplies and equipment to conduct skills-based training and testing.

² Sharing test results are the responsibility of the employer of either the trainer or direct care worker. Approved Programs that are private vocational training programs are only responsible for sharing trainer test results when requested by a new/prospective employer of a trainer.

³ Maintenance of the employee listing is the responsibility of the employer of either the trainer or direct care worker. Approved Programs that are private vocational training programs are only responsible for maintaining an employee listing of trainers.

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Section 7 - Trainer Qualification Standards

An Approved Program must have documentation to verify that trainers are prepared and qualified to train prior to training direct care workers. **ACOM, Chapter 429, III.2**

Line 7a - Evidence of 92% minimum passing grade for knowledge test(s)

An Approved Program must ensure and document that a trainer has achieved a score of 92% for the knowledge test(s) for any curriculum modules they teach. Testing of a trainer must be administered by a qualified trainer from another an Approved Program. **ACOM, Chapter 429, III.A.2.a**

Documentation shall include a training transcript or letter from the Approved Program attesting that the new trainer has passed the knowledge and skills tests at the level required of a trainer.

Line 7b - Evidence of 100% passing grade for skills testing

An Approved Program must ensure and document that a trainer has achieved a score of 100% for the skills test(s) for any curriculum modules they teach. Testing of a trainer must be administered by a qualified trainer from another an Approved Program. **ACOM, Chapter 429, III.A.2.a**

Documentation shall include a training transcript or letter from the Approved Program attesting that the new trainer has passed the knowledge and skills tests at the level required of a trainer.

Line 7c – Evidence trainers meet the direct care experience requirement

An Approved Program must ensure and document that a trainer has substantive hands-on experience as a caregiver of at least one year. Experience must include providing personal care and working with relevant client populations, such as older adults or individuals with disabilities, including family members. **ACOM, Chapter 429, III.A.2.b**

Documentation may include personnel records or a resume.

Exception for trainers employed by the Approved Program as a trainer prior to 10/01/12: If the trainer has passed both the knowledge and skills tests at the level required of a trainer but does not have the minimum one year of experience, they must obtain at least 40 hours of hands-on experience. The trainer is not eligible to train until the hands-on experience requirement has been met.

Documentation may include timesheets or personnel records outlining when and what services were rendered to obtain the 40 hours of hands-on experience.

NOTE: *This exception is generally not applicable. The requirement was instituted in October 2012, therefore, any trainers that did not meet this requirement during the initial desk audit should be in compliance. This is not allowable for trainers that are new hires by Approved Program's on or after 10/01/12.*

Line 7d – Evidence trainers meet the adult teaching experience requirement

An Approved Program must ensure and document that a trainer has at least one year experience in teaching groups of adults (any field). **ACOM, Chapter 429, III.A.2.c**

Documentation may include personnel records or a resume.

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Exception for trainers who do not have the required one year experience: If a trainer does not have the required experience in teaching groups of adults, they must obtain three months (100 plus hours) of preparation to become an instructor in direct care. Preparation can include coaching, mentoring, co-teaching, and coursework.

Documentation may include personnel records outlining the type of preparation activities and number of hours and/or a transcript for coursework.

Line 7e – Evidence of “expert” or assistant qualifications

An Approved Program must ensure and document the use and qualifications of “experts” that may train on a particular subject (e.g. Physical Therapist or Registered Nurse to train on body mechanics) related to their area of expertise in the absence of a qualified trainer. **ACOM, Chapter 429, III.A.2.e**

Documentation may include training schedules, class rosters, applicable licenses or certifications.

An Approved Program must ensure and document the use of assistant trainers. The trainer must be present for all training if the assistant trainer is not a qualified trainer. **ACOM, Chapter 429, III.A.2.f**

Documentation may include training schedules and class rosters.

Line 7f – Evidence trainers were qualified prior to training direct care workers

An Approved Program must ensure and document a trainer is qualified prior to training direct care workers.

Documentation may include personnel records, class rosters or a resume.

Line 7g – Evidence trainers have conducted at least two training classes per year

An Approved Program must ensure and document a trainer conducts at least two training classes per year to remain a qualified trainer. **ACOM, Chapter 429, III.A.2.d**

Documentation shall include class rosters.

NOTE: *The purpose of this requirement is to ensure trainers stay current with the curriculum and testing materials. If the trainer has not conducted the required number of training classes per year, the Approved Program must identify strategies to implement to support the trainer in staying current with the curriculum and testing materials. Strategies may include co-training, observing other trainers, reviewing the curriculum, etc. The strategies and timelines for completion must be documented in the trainer’s individual record.*

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Section 8 - Training Implementation Documentation and Record Maintenance Standards

Line 8a – Curriculum Standards

An Approved Program must either use the “*Principles of Caregiving*” curriculum or a curriculum that meets the competencies established for the “*Principles of Caregiving*.” ACOM, Chapter 429, III.A.1.a & b

The curriculum must be updated to align with updates posted to the AHCCCS website (www.azahcccs.gov/dcw) ACOM, Chapter 429, III.A.1.c

Documentation shall include training materials and crosswalks if the Approved Program is using a curriculum other than the “Principles of Caregiving.”

Line 8b – Record Maintenance

An Approved Program must maintain accurate and complete records of all training and testing. ACOM, Chapter 429, III.A.5.a

Documentation of training and testing sessions shall include, at a minimum, the following:

- *Verification of the implementation of the Approved Program’s model for knowledge and skills-based training*
- *Dates and times of class schedules with the names of trainers, experts and assistants*
- *Class rosters for knowledge and skill-based training including scores and signatures of students and trainers/experts/assistants*

NOTE: The maintenance of individual records is covered in section 10.

Line 8c – Test Administration

An Approved Program must administer tests according to the standards set forth in policy. Additional test administration guidelines may be found at www.azahcccs.gov/dcw. ACOM, Chapter 429, III.A.3.c-k

An Approved Program must utilize standardized tests provided by AHCCCS. Additionally an Approved Program may integrate the test (knowledge and skills) incrementally into the training program. The testing may be split into smaller units. A “final” test is not required if the testing is conducted in this manner. All knowledge and skills testing documents and questions shall remain secured. ACOM, Chapter 429, III.A.3.c

- *Verification of compliance shall include a review of the tests and the location where the tests remain secured.*
- *Documentation of the testing strategy (incremental versus final tests) shall include training and testing class schedules and rosters. Rosters must denote the test type for each student (regular, challenge or re-test).*

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Line 8d – Online Database

An Approved Program shall integrate the use of the online database into the day-to-day business practices. [ACOM, Chapter 429, III.A.5](#)

Verification of compliance shall include:

- Maintenance of a list organizational users including notifications sent to AHCCCS via email (DCW@azahcccs.gov) of user accounts that must be terminated or suspended
- Maintenance of an employee listing of individuals who will be or have been sent by the employer for training/testing according to AHCCCS standards. The employee listing must be updated within 30 days of a status change (terminated, hired, resigned).⁴
- Form used to obtain permission from current/prospective employees to access testing records in the online database
- Testing records have been reported in the online database within 30 days of a testing event

Section 9 - Student Testing Records

An Approved Program shall provide data (e.g., rosters) reflecting all individuals that were trained and tested for the audit period under review. The Auditor shall choose a random sample of 50%, but no more than 10 individual training records, to evaluate compliance of DCW training and testing requirements. The sample selection shall not be selected from a sole training session, but shall be representative of training sessions from multiple sites that have occurred throughout the audit period. [ACOM, Chapter 429, III.C.2.d](#)

Column 9a Student Initials

Enter the initials of the student record reviewed.

Column 9b Testing Modules

Verify the direct care worker took a written and skills-based test for each module. Direct care workers are required to, at a minimum, pass the Level 1-Fundamentals module test and one specialty Level 2 module (Developmental Disabilities or Aging and Physical Disabilities) test.

NOTE: Direct care workers, solely serving family members, are only required to pass the Level 1-Fundamentals module written and skills-based test. The record must document the reason why the student was exempt from the Level 2 module testing requirement. Some direct care workers will take both of the specialty Level 2 module tests.

Column 9c Test Type

Verify the type of tests (regular, challenge or re-test) that was taken by the direct care worker. The documentation must reflect the student's eligibility for the type of test that was taken according to the descriptions below. [ACOM, Chapter 429, III.A.3.e-g](#)

Regular Test: The direct care worker participated in a full-scale training session prior to testing.

Challenge Test: The direct care worker did not participate in a full-scale training session, but has documented education or work experiences similar to that of direct care workers.

Re-test: The direct care worker participated in a full-scale training session, but did not pass either written tests and/or some of the skills.

⁴ Maintenance of the employee listing is the responsibility of the employer of either the trainer or direct care worker. Approved Programs that are private vocational training programs are only responsible for maintaining an employee listing of trainers.

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Column 9d Accommodations

Verify whether or not the direct care worker was provided an accommodation during the testing process. This may include a test in an alternate language or an oral test. If an accommodation was provided, the record should include a description of how the student was accommodated. [ACOM, Chapter 429, III.A.3.d](#)

NOTE: *If an accommodation was not provided to the student, select "Not Applicable" for this requirement.*

Column 9e Test Results

Verify the results and scores of the tests, for both the knowledge and skills-based tests, are provided with score sheets. Score sheets for skills-based testing shall include a list of each of the skills accompanied by a signature and notation of the trainer as to whether or not the student passed or failed each skill.

Column 9f Test Verification and Online Database

Verify the testing records of the direct care worker or trainer were entered into the online database (at a maximum) 30 days after the testing event. Additionally, verify the back-up documentation (either in hard copy or electronic format) is consistent with the data reported in the testing record. [ACOM, Chapter 429, III.A.5](#)

Column 9g Training Period

Verify the direct care worker training period concluded within 90 calendar days from the date of hire. If the training period expired, verify the direct care worker did not provide care until the training and testing requirements were met. [ACOM, Chapter 429, III.A.3.j](#)

NOTE: *This is only a requirement for Approved Programs that are a direct care service agency. If the Approved Program is a private vocational training program, select "Not Applicable" for this requirement.*

CONTINUING PROGRAM APPROVAL STATUS

Below is a brief outline of the procedures for the continuing program approval. Reference the [AHCCCS Contractor's Operations Manual \(ACOM\), Chapter 429, Section C](#), for the full scale policy pertaining to the continuing program approval.

Audit Procedure	Description	Policy Reference
Notice	Auditor shall provide 30-day advance notice to the Approved Program of the scheduled audit	ACOM, III.C.1a ACOM, III.C.2b
Finding: Compliant Compliant with Recommendations	Auditor shall send a completed report no later than 30 days from the scheduled audit. The Approved Program listing is updated monthly on the AHCCCS website with audit findings	ACOM, III.C.3.a ACOM, III.C.3.b
Finding: Provisional Approval Pending Corrective Action	The Approved Program submits a Corrective Action Plan (CAP) to the Auditor within 15 days of receipt of the audit findings and report.	ACOM, III.C.4.c
CAP Review	The Auditor sends a notice updating the continuing approval status to the Approved Program and to AHCCCS.	ACOM, III.C.4.d

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Section 10 – Approved Program - Status

Line 10a - Compliant

Check the box if the Approved Program has met the minimum standards required to be an Approved Program. *The audit noted the Approved Program was either “compliant” or the standard was “not applicable” for each of the audit sections.*

Line 10b – Compliant with Recommendations

Check the box if the Approved Program has met the minimum standards, but there are areas noted that need improvement. The Auditor explained the reason for the recommendation and/or provided a suggestion for making improvements.

Line 10d - Provisional Approval Pending Corrective Action

Check the box if the Approved Program has not met the minimum standards. The Auditor provided a comment for each standard when the Approved Program was not compliant with a standard. Note: The notice of audit findings shall provide a summary of the deficiencies noted to support the Approved Program in developing and implementing a corrective action plan.

Line 10e – Denied

Check the box if the Approved Program’s Corrective Action Plan was not approved after two attempts. Once notified of a “denial” status, AHCCCS will notify the Approved Program that they are no longer an approved direct care worker training and testing program. A training and testing program that has been denied continuing program approval shall wait at least 90 days from the denial notice before submitting a new application to become an Approved Program. **ACOM, Chapter 429, III.C.4.e & f**

Section 11 – Notifications

Line 11a – Audit findings were sent to the Approved Program and to AHCCCS

Enter the date that the Approved Program and AHCCCS were notified of the continuing program approval status.

NOTE: *If the continuing program approval status was either “approval” or “approval with recommendations,” the Auditor does not need to complete the remainder of this section.*

Line 11b – Corrective Action Plan Approved

Enter the date that the Approved Program was notified that the Corrective Action Plan was approved.

NOTE: *The Approved Program has two opportunities to submit a Corrective Action Plan in order to correct deficiencies outlined in the audit.*

Line 11c – Final status notification sent to the Approved Program and to AHCCCS

Enter the date that the Approved Program and AHCCCS were notified of the final continuing program approval status.

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*NOTE: If a Corrective Action Plan was approved, the Approved Program shall be granted an “approval” status. If the Corrective Action Plan was not approved after two attempts, the Approved Program shall be granted a “denial” status. Once notified of a “denial” status, AHCCCS will notify the Approved Program that they are no longer an approved direct care worker training and testing program. A training and testing program that has been denied continuing program approval shall wait at least 90 days from the denial notice before submitting a new application to become an Approved Program. **ACOM, Chapter 429, III.C.4.e & f***