

429 – DIRECT CARE WORKER TRAINING AND TESTING PROGRAM

EFFECTIVE DATES: 01/01/2012, 10/01/12, 10/01/14, PENDING

APPROVAL DATES: 04/01/11, 12/08/11, 03/08/12, 09/13/12, 10/03/12, 09/04/14, 08/24/15, 05/16/19

I. PURPOSE

This Policy applies to ALTCS E/PD and DES/DDD (DDD) Contractors and the Programs responsible for training and testing Direct Care Workers (DCW). This Policy sets forth minimum Program requirements and standards for Approved Direct Care Worker Training and Testing Programs to ensure uniformity of training Programs as well as to promote portability of testing records that are audited by the Contractors and AHCCCS.

II. DEFINITIONS

APPROVED DIRECT CARE WORKER TRAINING AND TESTING PROGRAM (“APPROVED PROGRAM” OR “PROGRAM”)

Any entity that is approved by AHCCCS to provide training and testing of DCWs. These Approved Programs can be an AHCCCS registered agency that provides Direct Care Services, a private vocational program or an educational institution (e.g. high school, college or university).

AHCCCS/ADMINISTRATION (‘AHCCCS OR AHCCCS ADMINISTRATION’)

For purposes of this policy, the Operations Unit within the Division of Health Care Management.

CORRECTIVE ACTION PLAN (CAP)

A written work plan that identifies the root cause(s) of a deficiency, includes goals and objectives, actions/tasks to be taken to facilitate an expedient return to compliance, methodologies to be used to accomplish CAP goals and objectives, and staff responsible to carry out the CAP within established timelines. CAPs are generally used to improve performance of the Contractor and/or its providers, to enhance Quality Management/Process Improvement activities and the outcomes of the activities, or to resolve a deficiency.

DIRECT CARE SERVICES

The services provided by Direct Care Workers are collectively known as Direct Care Services. There are three types of services within ALTCS that are provided by Direct Care Workers; these include Attendant Care, Personal Care, and Homemaker services. See AMPM 1240-A.

DIRECT CARE WORKER (DCW)	A person who assists an elderly person or an individual with a disability with activities necessary to allow them to reside in their home. These individuals, also known as Direct Support Professionals, must be employed/ contracted by DCW Agencies or, in the case of member-directed options, employed by ALTCS members in order to provide services to ALTCS members.
DIRECT CARE WORKER AGENCY	An agency that registers with AHCCCS as a service provider of Direct Care Services that include Attendant Care, Personal Care or Homemaker. The agency, by registering with AHCCCS, warrants that it has a workforce (employees or contractors) with the abilities, skills, expertise and capacity to perform the services as specified in AHCCCS policy.
ONLINE DATABASE	The online database maintains the testing records of Direct Care Workers (DCWs) serving Arizona Long Term Care System members living in their own homes.
PRINCIPLES OF CAREGIVING	A curriculum prepared under the guidance of the Direct Care Workforce Alliance and adopted by AHCCCS as the standard competencies and curriculum for DCWs. The curriculum is made available to the public at no cost, and on the AHCCCS website www.azahcccs.gov/dcw .
PRIVATE VOCATIONAL PROGRAM	An Approved Program that does not have an AHCCCS Provider ID for providing services, or is a training Program that is subsidiary of a DCW agency. Individuals not established as a business organization cannot be a private vocational Program.
QUALIFIED DIRECT CARE WORKER	For the purposes of this policy, an individual who demonstrates DCW competencies by passing the required knowledge and skills tests. The DCW Agency is responsible to determine the DCW's competency to provide care utilizing the agency's policies and procedures, the DCW job description and the supports needs of the member's served by the DCW. In some instances qualified DCWs may not yet be employed or contracted by a DCW Agency.
TRAINER	Individuals designated by an Approved Program and qualified to conduct training and testing of DCWs.

III. POLICY**A. REQUIREMENTS FOR AN APPROVED DIRECT CARE WORKER TRAINING AND TESTING PROGRAM**

Approved Direct Care Worker Training and Testing Programs (Approved Programs or Program) shall comply with all minimum requirements and standards outlined in this Policy. Only Approved Programs may qualify DCWs by administering the required training and AHCCCS standardized tests. Training and tests administered by an organization that is not an Approved Program are not valid.

1. Curriculum/Competency Standards

- a. An entity is required to utilize, the “Principles of Caregiving” curriculum, unless the standard below is met. An Approved Program or an entity seeking Program approval may incorporate other/supplemental training material throughout the course of the implementation of the Program’s training,
- b. An entity not using the “Principles of Caregiving” shall submit evidence that its training curriculum meets the DCW competencies established for the “Principles of Caregiving,” and
- c. An Approved Program shall routinely update their curriculum to align with updates posted to the AHCCCS website, as appropriate.

2. Trainer Qualifications and Protocols

An Approved Program is responsible to prepare and/or qualify (initially and ongoing) its trainers. An Approved Program shall ensure each trainer:

- a. Has achieved a minimum score of 92% for the knowledge test(s) before the trainer begins teaching and a score of 100% for the skills test for any curriculum modules the trainer teaches. Approved Programs can train their own trainer, but the testing of a trainer shall be administered by a trainer from another Approved Program. The same testing standards apply to trainers and DCWs. DCWs who become trainers are not required to retake the knowledge and skills tests if the original test scores were at or above the level required of a trainer. However, skills tests shall be retaken because the skills-based testing requirements are more stringent for trainers than DCWs,
- b. Has substantive hands-on experience as a caregiver of at least one year. Experience shall include providing direct care services and working with relevant client populations, such as older adults or individuals with disabilities, including family members,
- c. Has at least one year experience in teaching groups of adults (any field) or 100 plus hours preparation to become an instructor in direct care. Preparation may include coaching, mentoring, co-teaching, and/or coursework,
- d. Conducts at least two DCW training classes per year. If the trainer is unable to meet this requirement as a result of low demand for DCW training and testing by the Approved Program, the trainer shall engage in documented activities to stay current with the curriculum including, but not limited to, coaching a DCW in their

work environment, co-teaching with another qualified trainer, attending classes conducted by another qualified trainer, reviewing instructional materials, and

- e. An Approved Program shall also ensure the following:
 - i. Individuals who are “experts” or licensed/certified on a training subject (e.g. Physical Therapist or Registered Nurse (RN) to train on body mechanics) may provide training related to their area of expertise in the absence of a qualified trainer. The Approved Program is responsible to ensure that “experts” used to provide training are capable and competent to conduct a portion of the training,
 - ii. Trainers may have assistant trainers to assist with training. The qualified trainer shall be present for all training if the assistant trainer is not qualified, and
 - iii. Trainers who are also a Registered Nurse (RN), Licensed Practical Nurse (LPN) or Certified Nursing Assistant (CNA) per A.R.S. §32, Chapter 15 shall meet all of the aforementioned requirements to become a qualified trainer outlined in this section.
3. Training and Testing Standards:
- a. An Approved Program shall have access to the necessary space to conduct training and testing. The knowledge based aspect of training can be provided through a variety of approaches, including video and e-learning. Portions of the skills training can also be provided through video and e-learning techniques; however, there shall be hands-on training of skills to ensure the student is able to appropriately perform the task (e.g. wheelchair transfer),
 - b. An Approved Program shall have access to the basic necessary supplies and training equipment (e.g. wheelchair, hospital bed) to facilitate skills training and testing. Appropriate alternative supplies or training equipment may be used. A list of required and recommended supplies and equipment is available on the AHCCCS website,
 - c. An Approved Program shall use AHCCCS standardized tests. The Approved Program may integrate the test (knowledge and skills) into its program. The testing may be divided into smaller units, administered in segments. A “final” test is not required if the testing is conducted in this manner. The Approved Program shall ensure that all knowledge and skills testing documents and questions remain secured,
 - d. An Approved Programs must comply with all applicable state and federal statutes and regulations, such as but not limited to the Americans with Disabilities Amendments Act; Section 504 of the Rehabilitation Act; and/or the Civil Rights Act of 1964, to ensure that students have an equal opportunity to participate in the training and testing,
 - i. Approved Programs are responsible for taking reasonable steps to ensure that individuals with Limited English Proficiency have an equal opportunity to participate in the training and testing. Such steps may include, but are not limited to the following:
 - a) The use of training materials and tests in an alternative language,

- b) The use of foreign language dictionaries as a reference tool for students, or
- c) The use of a competent interpreter,
- ii. Approved Programs are responsible for ensuring that students with disabilities are provided with effective communication and reasonable accommodations if necessary to provide the student an equal opportunity to participate in the training and testing. Examples of reasonable accommodations may be, but are not limited to:
 - a) The ability to take an oral rather than written test. If an oral test is provided, the student must take the test in another location, separate from other students and the proctor must read from the prepared text in a neutral manner,
 - b) The use of a qualified and competent interpreter,
 - c) The ability to sit for the test in a room separate from other students, or
 - d) Additional time to complete the test.
- e. A DCW may take the AHCCCS standardized test in lieu of training, to demonstrate competency. A DCW agency may request a challenge test one time for an employee/contractor if they have education similar to what is required for DCWs or work experiences similar to that performed by DCWs. The DCW agency and the Approved Program administering the challenge test shall verify and document the DCWs related educational and work experience. The challenge test cannot be repeated. A student who takes the challenge test and fails (either knowledge or skills tests or both) shall be trained and, then, retake and pass the knowledge and skills tests in order to become a qualified DCW,
- f. Retesting is permitted if the student has been trained or is otherwise exempt from the training requirement. If a knowledge test is failed, the student shall retake the entire test. If one or more skills are failed, only the failed skill(s) shall be retested. Trainers shall provide additional training as needed before retesting. Retesting cannot occur the same day the failed tests were administered,
- g. A DCW who is also a RN, LPN or CNA per A.R.S. §32, Chapter15 is exempt from the DCW training and testing requirements. However, DCW agencies have the discretion to test and train their employees/contractors as they determined necessary. Trainers who are also a RN, LPN, or CNA per A.R.S §32, Chapter 15 shall meet all the requirements to become a qualified trainer including the requirement to pass the knowledge and skills tests,
- h. A DCW with an initial hire date prior to 10/01/2012 is deemed to meet the training and testing requirements with the DCW agency (ies) with which they are currently employed. However, if the DCW becomes employed with another agency on or after 10/01/2012, the DCW shall meet the training and testing requirements as specified in this Policy and AMPM Policy 1240-A,
- i. Except for those DCWs who meet the exemption standards as outlined in this policy, a DCW shall have achieved a score of 80% for each knowledge test that the DCW completes and shall achieve a score of 100% of the skills test for any curriculum modules the DCW completes,
- j. All DCWs with an initial hire date on or after 10/01/2012 shall meet the DCW training and testing requirements within 90 calendar days from date of hire. It is

permissible for DCWs to provide care during the 90 day training period. In the event the DCWs 90 day training period has expired prior to the DCW receiving training and passing the knowledge and skills tests, the DCW shall stop providing care until the training and testing requirements are met and the DCW Agency has determined the DCW is competent to provide care utilizing the agency's policies and procedures, the DCW job description and the support needs of the member's served by the DCW, and

- k. Arizona Direct Care Worker Standardized Testing Guidelines for Test Administration are available on the AHCCCS website.
4. Program Policy Standard
- An Approved Program shall maintain policies to support the operations of the Program that are consistent and adhere with this Policy.
- Policies and procedures must address, at a minimum, the following:
- a. Curriculum standards, implementation models or strategies for knowledge and skills-based training,
 - b. Trainer qualifications and protocols,
 - c. Record maintenance,
 - d. Test administration,
 - e. Test verification, and
 - f. Online database.

5. Training and Testing Records

An Approved Program shall maintain accurate and complete records of all training and testing. This includes but is not limited to names of trainers including the names of any individual experts used, schedules (dates and times), class rosters with evidence of student attendance (student and trainer signatures) and individual student records (test type, modules and results).

Programs shall integrate the use of the AHCCCS DCW and trainer testing records Online Database into day to day business practices. The primary purpose of the Online Database is to serve as a tool to support the portability or transferability of DCW or trainer testing records from one employer to another employer. The database is available online at www.dcwrecords.azahcccs.gov with computer-based training modules, a frequently asked questions document, and a User Guide under the "help" tab. Approved Programs shall:

- a. Maintain a list of users and notify AHCCCS when a user account shall be terminated or suspended,
- b. Maintain and manage an employee/contractor listing of trainers who will be or have been sent for training/testing including updating status changes of employees/contractors (hired, terminated, resigned) within 30 days of the status change,
- c. Utilize the Testing Records Search Authorization Form to obtain permission from current/prospective trainer employees/contractors to access testing records in the online database, and

- d. Report testing results for DCWs or trainers in the online database within 30 days of a testing event.
 - i. In the event testing records are not available in the Online Database, a hard copy form shall be used for testing record verification. A current/former/prospective employer of a trainer shall share upon request and/or may solicit testing records using the ‘Verification of Direct Care Worker Testing’ form. ‘The Verification of Direct Care Worker Testing’ form is available on the AHCCCS website. The employer shall maintain copies of the verification testing forms provided to and/or requested from another trainer employer. Verification may also include an official transcript from an Approved Training and Testing Program of the test type(s), date(s), module(s), and score(s). Back up documentation shall be retained for a minimum period of ten years. Back-up documentation includes the testing search authorization standard form and back-up documentation for any and all entered data in the Online Database or any data pertaining to training and testing of DCWs or trainers. The documentation can be retained in either an electronic or hard copy filing system.

6. DCW Agency Roles and Responsibilities

In addition to other responsibilities, DCW Agencies shall ensure DCWs meet minimum competencies to provide quality care to ALTCS members as Specified in AMPM Policy 1240-A. DCW Agencies have the option to become an Approved Direct Care Worker Training and Testing Program or to delegate the responsibility of DCW training and testing to an Approved Direct Care Worker Training and Testing Program (See AMPM Policy 1240-A). The roles and responsibilities of the DCW Agencies that employ or contract with DCWs to provide care, including continuing education requirements, are found in AMPM Policy 1240-A.

B. INITIAL PROGRAM APPROVAL

1. Application

A completed, signed, and dated ‘Application for Approval for DCW Training and Testing’ form shall be submitted to AHCCCS. The form is available on the AHCCCS website:

- a. The application shall also be accompanied by the following documentation which demonstrates competency and preparedness to conduct training and testing of DCWs:
 - i. Policy and procedures for the training program structure, test administration, and verification and the use of the Online Database,
 - ii. Access to necessary space to conduct training and testing,
 - iii. Access to necessary equipment and supplies, and
 - iv. Verification of qualified trainers.
- b. An entity that charges individual students for DCW training and testing shall be licensed by the Arizona Board of Postsecondary Education unless otherwise

exempt under A.R.S. §32-3021. This information is required to be disclosed on the application.

2. Review of Application

The initial application review is conducted by a “desk audit,” with no planned onsite review. AHCCCS will coordinate with the Contractors to determine which Contractor shall perform the desk audits. AHCCCS/Contractor shall:

- a. Perform a desk audit to review information, documents, and evidence provided by the Approved Program applicant including, at a minimum, policies and procedures, evidence of adequacy of training space and evidence of access to the necessary equipment and supplies to provide the skills training and testing and qualification of trainers,
- b. Request, as needed, additional documents from the applicant before making a final determination to approve an application,
- c. Send a notice within 45 days of the receipt of the application along with a Notice of Deficiency outlining inaccurate or missing documentation/information from the application. If the desk audit findings conclude documentation was insufficient or incomplete, the applicant will have 15 days to respond to the notice with updated documentation or information,
If the applicant fails to respond to the Notice of Deficiency and/or satisfy the requirements within the prescribed timeframe, the applicant shall be required to submit a new application for program approval, and
- d. Notify the applicant of the denial and the requirement to wait a minimum of 30 days to submit a new application to become an Approved Program.

3. Final Approval of Application and Notice:

- a. A written notice of approval will be sent to the requesting entity by AHCCCS/Contractor no later than 45 days from the receipt of a sufficient and complete application. The written notice will include the effective date of the approval,
- b. Training and testing of DCWs may begin no sooner than the date of Program approval, and
- c. All Approved Programs will be listed at www.azahcccs.gov/dcw.

C. CONTINUING PROGRAM APPROVAL

1. Onsite Audit:

- a. After a DCW training and testing Program is approved, AHCCCS / Contractor will conduct a post-initial audit within 180 days of the initial Program approval. AHCCCS will coordinate with the Contractors to determine which Contractor shall perform the onsite audits. AHCCCS may perform audits in lieu of the Contractors. An onsite review of an Approved Program, outside of the audit cycle, may be performed at the discretion of AHCCCS / Contractor, or the assigned auditing Contractor,
- b. The onsite audit occurs annually close to the anniversary of the post-initial audit

- c. Auditors will visit the Approved Program's main training site, but the audit will be inclusive of all training sites,
 - d. For Approved Programs with a compliant audit finding, the next onsite audit is not required for two years,
 - e. The AHCCCS/Contractor shall provide at least a 30 day advance notice of a scheduled audit in order for the Approved Program to prepare for the audit,
 - f. Information, documents and evidence to be provided by the Approved Program and reviewed by AHCCCS / Contractor include but are not limited to, policies and procedures, evidence of adequacy of training space, evidence of access to the necessary equipment and supplies to provide the skills training and testing, qualifications of trainers, curriculum and training and testing records including training and testing records of individual students. Other documents shall be made available to AHCCCS/Contractor upon request,
 - g. A random sample of 50%, but no more than 10 individual training records will, be selected by AHCCCS/Contractor from the Online Database 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 training sites that have occurred throughout the audit period,
 - h. A record review to determine if the DCW providing services has met the training and testing requirements is not part of the process for continuing Program approval. AHCCCS/Contractor shall review this type of information when monitoring a DCW agency to ensure a member's caregiver is a qualified DCW as required by AMPM 1240-A. For Approved Programs that also serve as a DCW agency, AHCCCS/Contractor are encouraged to conduct the annual monitoring oversight of DCW services at the same time as the continuing Program approval review in an effort to reduce the administrative burden.
2. Notice of Audit Findings:
- a. AHCCCS/Contractor will issue a letter indicating the findings of the audit specifying whether the Program is compliant, is compliant but shall address recommendations, or is granted a provisional approval pending corrective action. The completed report shall be provided to the Approved Program within 30 days of completing the audit,
 - b. AHCCCS will update the Approved Programs listing with the audit findings to the AHCCCS website on a monthly basis, and
 - c. AHCCCS/Contractor may access the audit findings through the Online Database.
3. Provisional Approval Pending Corrective Action:
- a. If AHCCCS/Contractor determines the Approved Program is not compliant in one or more areas of the audit, the Approved Program shall be granted provisional approval pending a CAP. AHCCCS/Contractor shall summarize the deficiencies noted in the audit report to assist the Approved Program in developing and implementing a CAP. Approved Programs with a provisional approval status are permitted to continue to provide training and testing of DCWs,

- b. The Approved Program shall submit its CAP to AHCCCS/Contractor within 15 days of receipt of the audit findings and report. The CAP shall include a timeline for the deficiencies to be corrected, not to exceed 30 days from the CAP submission,
 - c. AHCCCS/Contractor has the discretion to require the Approved Program to submit evidence or documentation and/or conduct an on-site review to determine if the CAP was implemented successfully,
 - d. AHCCCS/Contractor shall send a notice updating the provisional Program approval status to the Approved Program and updated the Program's status in the Online Database. If AHCCCS/Contractor determines that the Program remains out of compliance, 3.a. b. and c. will be performed an additional time,
 - e. If the Program fails to correct the deficiencies after having submitted two CAPs, the Contractor will timely notify AHCCCS of the deficiencies. AHCCCS will notify the Approved Program that the provisional approval has been denied and that it cannot operate a direct care worker training and testing Program, and
 - f. A training and testing Program that has been denied continuing Program approval based on the findings from an audit, is not permitted to submit a new application to become an Approved Program for a minimum of 90 days from the date of the notice advising the Program it is no longer an approved Program.
5. Disagreement with Audit Findings:
- a. An Approved Program which disagrees with the audit findings may submit its disagreement to the auditing AHCCCS/Contractor. Any disagreement submitted by the Approved Program shall be received by the AHCCCS/Contractor no later than 15 days of receipt of the audit findings and report and shall include evidence to support its position,
 - b. AHCCCS/Contractor shall reconsider the results of the review based on the evidence submitted Program. AHCCCS/Contractor shall submit findings to the Program within 30 days of receipt of the disagreement,
 - c. If the Program is in disagreement with AHCCCS/Contractor's reconsideration decision, the Program may request review by the AHCCCS Administration. The review request shall be received no later than 15 days from the date of AHCCCS/Contractor's reconsideration decision. The AHCCCS Administration will issue a determination specifying whether the Program continues to serve as an Approved DCW Training and Testing Program. In the event the Program is in disagreement with an AHCCCS audited finding, the AHCCCS Administration shall refer the Program's audit findings disagreement to the Clinical Quality Management Department within AHCCCS to render a final determination of the continued status of the Approved Program.
 - d. AHCCCS shall post the final results to the AHCCCS website and notify all Contractors in writing.
6. Audit findings and reports and other related documents shall be maintained by the AHCCCS/Contractor that performs the audit for ten years.