

429 – DIRECT CARE WORKER TRAINING AND TESTING PROGRAM

EFFECTIVE DATE: 1/01/2012, 10/01/12, 10/01/14

REVISION DATE: 4/01/11, 12/08/11, 03/08/12, 09/13/12, 10/03/12, 09/04/14, 08/24/15

STAFF RESPONSIBLE FOR POLICY: DHCM OPERATIONS

I. PURPOSE

This Policy applies to ALTCS/EPD and DES/DDD (DDD) Contractors and the Programs 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. In addition to other responsibilities, DCW Agencies, as the employer of the DCW, must ensure DCWs meet minimum competencies to provide quality care to ALTCS Members. 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).

II. DEFINITIONS**APPROVED DIRECT CARE
WORKER TRAINING AND
TESTING PROGRAM
("APPROVED PROGRAM")**

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).

**ARIZONA STANDARDIZED DCW
TEST**

The test that an individual must pass to demonstrate the required knowledge and skills to become a qualified DCW.

CHALLENGE TEST

The standardized test that an individual with education similar to what is required for DCWs or work experiences similar to that performed by DCWs can request to take without having to complete the required DCW training.

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, Chapter 1200.

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 by DCW Agencies or, in the case of member-directed options, by ALTCS members. The DCW Agency or ALTCS member establishes DCW terms of employment. See AMPM, Chapter 1200, Policy 1240-A.

DIRECT CARE WORKER AGENCY

An agency that registers with AHCCCS as a service provider of Direct Care Services that include Attendant Care, Personal Care and Homemaker. The agency, by registering with AHCCCS, warrants that it has the ability, authority, skill, expertise and capacity to perform the services as specified in AHCCCS Policy.

PRINCIPLES OF CAREGIVING

A curriculum prepared under the guidance of the Direct Care Workforce Alliance and made available to the public at no cost. The curriculum consists of Caregiving Fundamentals and two modules:

1. Aging and Physical Disabilities, and
2. Developmental Disabilities.

The content of this curriculum addresses the DCW competencies; and will be updated periodically. Adopting the Principles of Caregiving curriculum satisfies the requirements for curriculum approval, but no guarantee is made that students completing the training will have all skills needed to provide services to a particular client. The curriculum is available 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. This can include private businesses. Individuals not established as a business organization cannot be a private vocational Program.

PROGRAM

An entity that is approved to provide the training and testing of DCWs as required by AMPM Chapter 1200. (Same as “Approved Direct Care Worker Training and Testing Program” and “Approved Program”)

TRAINER

Individuals designated by an Approved Program and qualified to conduct training of DCWs. Trainers must have passed all the tests at the level required of Trainers for competencies they teach including, but not limited to, Caregiver Fundamentals, Aging and Physical Disabilities and/or Developmental Disabilities, have experience providing direct care and experience in teaching groups of adults.

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

Approved Direct Care Worker Training and Testing Programs (Approved Programs) must comply with all minimum Program requirements and standards outlined in this Policy for training and testing of DCWs. Only Approved Programs may administer the required

Arizona Standardized DCW test. Training and tests administered by an organization that is not an Approved Program are not valid.

1. Curriculum Standards

- a. An entity using the “Principles of Caregiving” is required to attest that it is utilizing these instructional materials during the initial application process. There is nothing that restricts an Approved Program or an entity seeking approval Program from including other training material.
- b. An entity not using the “Principles of Caregiving” must submit evidence that its training curriculum meets the competencies established for the “Principles of Caregiving”.
- c. An Approved Program must routinely update their curriculum to align with updates posted to the AHCCCS website at www.azahcccs.gov/dcw.

2. Trainer Qualifications and Protocols

An Approved Program is responsible to prepare and/or qualify (initially and ongoing) their trainers.

An Approved Program must 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 must be administered by a trainer from another Approved Program. The same testing standards apply to trainers and DCWs (See III.A.3.). 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 must 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 must include providing personal care and working with relevant client populations, such as older adults or individuals with disabilities, including family members. If the trainer, employed by the Approved Program as a trainer prior to 10/01/2012, has passed both the knowledge and the skills tests but does not have the minimum one year of experience, the trainer must obtain at least 40 hours of hands-on experience. The trainer is not eligible to train until the hands-on experience requirements have been met.
- c. Has at least one year experience in teaching groups of adults (any field) or three months (100 plus hours) preparation to become an instructor in direct care. Preparation can include coaching, mentoring, co-teaching, and coursework.
- d. Conducts at least two DCW training classes per year.

An Approved Program must also ensure the following:

- e. Individuals who are “experts” or licensed/certified on a training subject (e.g., Physical Therapist or Registered Nurse to train on body mechanics) may provide training related to their area of expertise in the absence of the qualified trainer. The Approved Program is responsible to ensure that “experts” used to provide training is capable/competent to conduct a portion of the training.
- f. Trainers may have assistant trainers to assist with training. The trainer must be present for all training if the assistant trainer is not a qualified trainer.
- g. Trainers who are also a Registered Nurse, Licensed Practical Nurse or Certified Nursing Assistant per A.R.S. §32, Chapter 15 must meet all of the aforementioned requirements to become a qualified trainer outlined in this section.

3. Training and Testing Standards

- a. An Approved Program must have access to the necessary space to conduct training. 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 must be hands-on training of skills to ensure the student is able to appropriately perform the task (e.g., wheelchair to bed transfer).
- b. An Approved Program must 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 (www.azahcccs.gov/dcw).
- c. An Approved Program must use standardized tests provided by AHCCCS. The Program may integrate the test (knowledge and skills) 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. The Program must ensure that all knowledge and skills testing documents and questions remain secured.
- d. If an individual is unable to take a written test they may request to take an oral knowledge test. If an oral knowledge test is provided it must be read from a prepared text in a neutral manner. An Approved Program may offer the tests to a student in a language other than English.
- e. A DCW agency may request the challenge test one time for an employee 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 must 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) must 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 exempt from the training requirement (e.g., Registered Nurse, Licensed Practical Nurse or Certified Nursing Assistant per A.R.S. §32, Chapter 15). If a knowledge test is failed, the student must

retake the entire test. If one or more skills are failed, only the failed skill(s) must 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 Registered Nurse, Licensed Practical Nurse or Certified Nursing Assistant per A.R.S. §32, Chapter 15 is exempt from the DCW training and testing requirements. This exemption allows the DCW agency the discretion to test and train their employees as determined necessary. **NOTE:** Trainers who are also a Registered Nurse, Licensed Practical Nurse or Certified Nursing Assistant per A.R.S §32, Chapter- 15 must meet all the requirements to become a qualified trainer (See III.A.2.), including the requirement to pass the knowledge and skills tests. They are permitted to take the tests and, then, retest if tests are failed without training.
 - 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) they are currently employed. However, if the DCW becomes employed with another agency on or after 10/01/2012, the DCW must meet the training and testing requirements as outlined in this Policy and AMPM, Chapter 1200, Policy 1240-A.
 - i. Except as noted above (in paragraph 3.g), a DCW must have achieved a score of 80% for each knowledge test that the DCW completes and must pass all (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 must 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 must stop providing care until the training and testing requirements are met.
 - k. Test administration guidelines are available on the AHCCCS website www.azahcccs.gov/dcw.
4. Program Policy Standard
- a. An Approved Program must maintain policies for: training Program structure and process; validating/verification and sharing individual DCW and trainer test results; and testing process and maintaining test integrity,
 - b. Policies must be reflective of the training and testing requirements.
5. Training and Testing Records
- a. 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

<https://dcwrecords.azahcccs.gov> complete with computer-based training modules, a frequently asked questions document and a User Guide under the “help” tab. Approved Programs shall:

- i. Maintain a list of organizational users and notify AHCCCS when a user account must be terminated or suspended;
- ii. Maintain and manage an employee listing of trainers who will be or have sent for training/testing including updating status changes of employees (hired, terminated, resigned) within 30 days of the status change;
- iii. Utilize a standard form to obtain permission from current/prospective trainer employees to access testing records in the online database; and
- iv. Report testing results for DCWs or trainers in the online database within 30 days of a testing event.

In the event testing records are not available in the online database, a hard copy form must 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 www.azahcccs.gov/dcw. 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).c. Back up documentation shall be retained for a minimum period of six 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.

- b. Training and testing record requirements and responsibilities of DCW Agencies are found in AMPM, Chapter 1200, Policy 1240-A.

6. Continuing Education

- a. Continuing Education requirements are the responsibility of the DCWs employer and not that of an Approved Program. See AMPM Chapter 1200, Policy 1240-A.

B. INITIAL PROGRAM APPROVAL

1. Application

- a. The applying entity must submit a completed, signed and dated *Application for Approval for DCW Training and Testing* form to AHCCCS. The form is available on the AHCCCS website www.azahcccs.gov/dcw.
- b. An entity that charges individual students for DCW training and testing must be licensed by the Arizona Board of Postsecondary Education A.R.S. §32.3001 et. seq. and A.A.C R4-39-103.

2. Review of Application

The initial application review is a “paper review,” with no planned onsite review. AHCCCS personnel will:

- a. Compare the application to the requirements.
- b. Request, as needed, additional documents from the applicant before making a final determination to approve an application.

3. Final Approval of Application and Notice

- a. A written notice of approval will be sent to the requesting entity by AHCCCS. 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.
- c. All Approved Programs will be listed at www.azahcccs.gov/dcw.

C. CONTINUING PROGRAM APPROVAL

After a DCW training and testing Program is approved by AHCCCS, an ALTCS 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 conduct the year one audit and subsequent onsite annual 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, the Contractor, or the assigned auditing Contractor.

1. Year One Audit

- a. The post-initial audit is a desk audit and does not constitute an onsite visit. The post-initial audit occurs one time within 180 days of an Approved Program’s initial approval. The 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.
- b. Information, documents and evidence to be provided by the Approved Program and reviewed by the auditor include, but are not limited to, 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. Additional documents must be available to the auditor upon request.

2. Onsite Audit

- a. The onsite audit occurs annually close to the anniversary of the year one audit. Auditors will visit the Approved Program’s main training site, but the audit will be inclusive of all training sites.
- b. The 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.
- c. Information, documents and evidence to be provided by the Approved Program and reviewed by the 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 must be made available to the Contractor upon request.

- d. Upon request from the Contractor, the Approved Program will provide data such as rosters which reflect all individuals who were trained and tested for the audit period under review. A random sample of 50%, but no more than 10 individual training records will, be selected by the Contractor 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.
 - e. 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. The Contractor must review this type of information when monitoring a DCW agency to ensure a member's caregiver is a qualified DCW as required by AMPM Chapter 1200. For Approved Programs that also serve as a DCW agency, Contractors are encouraged to conduct their monitoring oversight of DCW services at the same time as the continuing Program approval review in an effort to reduce the administrative burden.
3. Notice of Audit Findings
- a. The Contractor will issue a letter indicating the findings of the audit specifying whether the Program is compliant, is compliant but must address recommendations, or is granted a provisional approval pending corrective action. The completed report must 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 (www.azahcccs.gov/dcw) on a monthly basis.
 - c. The Contractor will promptly provide the full report to other Contractors upon request.
4. Provisional Approval Pending Corrective Action
- a. If the Contractor determines the Approved Program is not compliant in one or more areas of the audit, the Approved Program will be granted provisional approval pending a CAP. The 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 the 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. The 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. The Contractor shall send a notice updating the provisional Program approval status to the Approved Program and to AHCCCS. If the 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 an approved direct care worker training and testing Program.
 - 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 Contractor. Any disagreement submitted by the Approved Program must be received by the auditing Contractor no later than 15 days of receipt of the audit findings and report and must include evidence to support its position.
 - b. The auditing Contractor will reconsider the results of the review based on the evidence submitted Program. The Contractor shall submit findings to the Program and AHCCCS within 30 days of receipt of the disagreement.
 - c. In the event the Program is in disagreement with Contractor's reconsideration decision, the Program may request review by the AHCCCS Administration. The review request must be received no later than the date of the 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.
 - d. AHCCCS will 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 Contractor that performs the audit for six years.

D. EXEMPTIONS

1. Educational Institution

An educational institution (e.g., high school, college or university) is exempt from the initial and continuing Program approval requirements if it submits a signed copy of the *Application for Approval for DCW Training and Testing* form (Available on the AHCCCS website, www.azahcccs.gov/dcw) form attesting that its DCW training and testing Program meets the DCW competencies as established through the Principles of Caregiving. This form must be completed and submitted to AHCCCS for initial Program approval and annually thereafter.

2. Approved Programs licensed by the Arizona State Board for Private Postsecondary Education (AZPPSE)

A Program licensed by the AZPPSE is exempt from the initial and continuing Program approval requirements if it submits a signed copy of the *Application for Approval for DCW Training and Testing* form (Available on the AHCCCS website, www.azahcccs.gov/dcw) form attesting that its DCW training and testing Program meets the DCW competencies as established through the Principles of Caregiving. This form must be completed and submitted to AHCCCS for initial Program approval and annually thereafter.

IV. REFERENCES

- ALTCS/EPD Contract, Section D
- DES/DDD Contract, Section D
- A.A.C. R4-39-103
- A.R.S. §32, Chapter15
- A.R.S. §32-3001
- AMPM Chapter 1200