

# Additional Guidance Regarding Certification of Temporary Nurse Aides

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## SCDHHS PROVIDER ALERT

On April 7, 2022, the Centers for Medicare and Medicaid (CMS) issued guidance announcing it was ending specific emergency declaration blanket waivers for skilled nursing facilities (SNFs) and nursing facilities (NFs) that allowed them to employ temporary nurse aides (TNAs) for longer than four months without completion of training and certification requirements. To comply with the guidance issued by CMS, the South Carolina Department of Health and Human Services (SCDHHS) announced in [Medicaid Bulletin #22-006](#) that TNAs must become fully certified by Oct. 6, 2022. Effective June 6, 2022, no additional TNAs should enter employment under the blanket waiver exceptions.

To assist with the transition for TNAs to become certified nurse aides (CNAs), SCDHHS will recognize documented time spent working in a temporary capacity in a health care facility under the direction of a registered nurse (RN) toward the required 40 hours of clinical skills training. In addition, for required classroom hours, SCDHHS will recognize TNAs that have been working in a temporary capacity for a minimum of six months and have documentation of completion of the eight-hour TNA online course to satisfy the classroom hours required.

TNAs must have been hired by April 6, 2022, to allow enough time to meet the six-month experience and classroom training requirement by the deadline of Oct. 6, 2022. Documentation of TNA online training and in-service training must include instruction in the areas defined by federal requirements (42 CFR §483.152[b]), such as respecting residents' rights, basic nursing skills, personal care skills and caring for cognitively impaired residents. Federal regulations (42 CFR §483.154[b][1][i] and [ii]) also require TNAs pass a written or oral exam, and demonstrate skills learned.

TNAs are encouraged to consider enrollment and completion of the full state-approved training curriculum. For TNAs that intend to submit documentation of time worked and completion of the eight-hour TNA online course, SCDHHS strongly recommends accessing and reviewing the Candidate Handbook and example certification test located at <https://credentia.com/test-takers/sc>.

## Steps for a TNA to Become a Certified CNA

The following steps outline the process for TNAs to become fully certified CNAs on the South Carolina Nurse Aide Registry:

### 1. Facility Completes Documentation of Work Experience

**South Carolina SNF/NH providers must complete and email the [South Carolina Temporary Nurse Aide Provider Attestation Form](#) by Friday, September 9, 2022.** Documentation of work experience as a TNA in South Carolina should be submitted by the individual NF or SNF via attestation with staffing roster to SCDHHS. The submission must include the following information: facility name, provider number, staffing roster, and a completed attestation with signature. **Documentation should be submitted to [SCNAR@scdhhs.gov](mailto:SCNAR@scdhhs.gov) by Friday, September 9, 2022.**

## 2. Candidates Should Create a CNA365 Account

TNAs should create a CNA365 account and register on the [Credentia website](#) choosing one of the options below:

- **Option 1: Worked Six Months as a TNA:** The TNA worked in a NF during the federal public health emergency (PHE) between Jan. 27, 2020, and April 6, 2022, for a minimum of six months, and completed the eight-hour TNA course to satisfy classroom training hours.
- **Option 2: Worked Less Than Six Months as a TNA:** The TNA worked in a NF during the PHE between Jan. 27, 2020, and June 5, 2022, worked 40 hours as a TNA, and completed at least a 60-hour classroom training course from a state-approved nurse aide training program. The 40 work hours as a TNA may be counted as credit towards the required 40 clinical hours of nurse aide training.

## 3. SCDHHS Approval to Register for the Exam

Once SCDHHS receives the verified attestation form from the facility, approves the TNA's work experience and classroom training, and matches the candidates CNA365 information on Credentia website, the candidate is approved to register for the exam. The candidate's Credentia CNA365 account will send an approval email notification confirming that the application was approved.

## 4. Register for Exam

Following SCDHHS approval, the candidate may [register for one of the TNA exams](#). Candidates may attempt the exam three times. If the candidate successfully passes both the written and skills portions of the exam, they will receive full certification and will be added to the South Carolina Nurse Aide Registry.

Please direct questions regarding this alert to [SCNAR@scdhhs.gov](mailto:SCNAR@scdhhs.gov).

Thank you for your support of the South Carolina Healthy Connections Medicaid program.