



April 17, 2020

Dear Ohio Nurse Aide Training & Competency Evaluation Programs,

On April 16th, 2020 the Director of Health suspended portions of the Ohio Administrative Code as it pertains to licensed NATCEPs (Nurse Aide Training Competency Evaluation Programs) in Ohio. The suspensions will be dated from March 9th, 2020 when the Emergency was declared and will remain in place throughout the declared State of Emergency in Ohio due to the COVID-19 response. Please note that these rules are only suspended, not changed. NATCEPs should regularly check the EIDC (Enhanced Information Dissemination & Collection) Bulletin Board for information posted by The Ohio Department of Health and the NATCEP Unit.

Three portions of 3701-18 have been suspended. The Code references and impact are provided:

- 3701-18-08(D). Students who were In Process on March 9th, 2020 will not be limited to 60 days to make up their absence. This pertains to classroom instruction and clinical hours. When the suspension of this rule is lifted at the end of the Emergency the time frame of 60 calendar days will be reimplemented.
- 3701-18-09(K)(2). Classroom instruction may be conducted by the use of virtual media. This pertains to the 59 hours of classroom instruction. Not the 16 hours of clinical time.
- 3701-18-12. Clinical hours will not be required to be conducted in the skilled nursing facility, but rather for the duration of the Emergency, may be conducted in the program's skills lab or a skills lab accessed off site for this purpose. It is important to remember that clinical time, or *practical training* does have a federal requirement that cannot be waived by the State. Three phrases are of note; *performing tasks on an individual* and *direct supervision* and *laboratory*. The Code of Federal Regulations reference is provided:

§ 483.152 Requirements for approval of a nurse aide training and competency evaluation program.

(a) For a nurse aide training and competency evaluation program to be approved by the State it must, at a minimum -

- (1) Consist of no less than 75 clock hours of training;
- (2) Include at least the subjects specified in paragraph(b) of this section;
- (3) Include at least 16 hours of supervised practical training. Supervised practical training means training *in a laboratory* or other setting in which the trainee demonstrates knowledge while performing tasks *on an individual* under the *direct supervision* of a registered nurse or a licensed practical nurse;

Please feel free to email or call the NATCEP Unit at any time to discuss the suspended rules, the COVID-19 response, or any matters that pertain to NATCEP, TTT (Train the Trainer) and DA (Dining Assistant) programs in Ohio.

Sincerely,

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