

REIMBURSEMENT FOR NURSE AIDE TRAINING
AND COMPETENCY EVALUATION (NATCEP) COSTS

- 1) In what instances do facilities have to reimburse nurse aides for nurse aide training costs?

Per Title 42 Code of Federal Regulations (CFR) 483.152(c) Prohibition of Charges. (1):
“No nurse aide who is employed by, or who has received an offer of employment from, a facility on the date on which the aide begins a nurse aide training and competency evaluation program may be charged for any portion of the program (including any fees for text books or other required course materials).”

Further, per Title 42 CFR 483.154(c) Administration of the Competency Evaluation. (2):
“No nurse aide who is employed by or who has received an offer of employment from a facility on the date on which the aide begins a nurse aide competency evaluation program may be charged for any portion of the program.”

If the nursing home provider has hired the nurse aide or made the offer of employment prior to course completion, they must pay the full cost of the training program.

If the individual pays for the nurse aide competency evaluation program without being employed or having an offer of employment, then federal regulation 42 CFR 483.152(c) (2) applies. It states: “If an individual who is not employed, or does not have an offer to be employed, as a nurse aide becomes employed by, or receives an offer of employment from, a facility not later than 12 months after completing a nurse aide training and competency evaluation program, the State must provide for the reimbursement of costs incurred in completing the program on a pro rata basis during the period in which the individual is employed as a nurse aide.”

Further 42 CFR 483.154(c) (3) states: “If an individual who is not employed, or does not have an offer to be employed, as a nurse aide becomes employed by, or receives an offer of employment from, a facility not later than 12 months after completing a nurse aide competency evaluation program, the State must provide for the reimbursement of costs incurred in completing the program on a pro rata basis during the period in which the individual is employed as a nurse aide.”

If a nurse aide pays for the competency evaluation program to become certified and is not employed or does not receive an offer of employment for six months after finishing the course, the nursing home provider would only be expected to pay 50% of the cost of the program for the six months the nurse aide was employed during the 12 month period.

- 2) Does reimbursement include course costs? Textbooks? Other required course materials?

NATCEP costs cover:

Any portion of the training coursework;
Fees for textbooks or other required course materials;
Registering individuals on the nurse aide registry; and
Administration of the competency examinations.

- 3) How does the facility get reimbursed by the state for training costs?

Each state administers reimbursement according to its Medicaid State Plan. In Kansas, the nursing home provider reimburses the nurse aide training expense and then reports it on the Nursing Facility Financial and Statistical Report (cost report) and is reimbursed as part of its daily Medicaid rate. These costs are reported on line 260 and for more information on how that is reported on the cost report please go to http://www.aging.state.ks.us/Forms/Ratesetting_Forms/2008CostReportInstructions.pdf, select "Annual Reporting Worksheets and Forms," then go to the first selection, Instructions For Completing the Nursing Facility Financial..., then go to page 11.

- 4) Do all facilities have to reimburse training costs or just Medicare/Medicaid facilities?

Only Medicare/Medicaid facilities are required to reimburse training costs. State regulations do not require licensed-only facilities to reimburse nurse aides for NATCEP.

- 5) When does the aide have to be reimbursed? Can the reimbursement be spread over 12 months? Is it to be paid the first week? The first month?

See the response to question one. A nursing home provider who employs a nurse aide or makes an offer of employment prior to course completion must pay the full cost of the program up front. The nurse aide may not be charged for any portion of the program.

If a nurse aide pays for the cost of the training and is not employed or have an offer of employment, the federal regulations allow the provider to reimburse the costs "over a reasonable period of time while the individual is employed as a nurse aide." Since the reimbursable costs can be pro rated over 12 months, it is assumed the reasonable amount of time can not exceed a 12 month period from the date a nurse aide completed the program.

For example, if a nurse aide is not employed for six months after the course is completed, the nursing home provider would only be responsible for 50% of the cost. That cost can be pro rated over the remaining six month period. If a nurse aide was not employed for three months, the provider would be responsible for 75% of the cost and it could be pro rated over nine months.

When a nurse aide pays for non-facility-based training costs and then is immediately hired by a nursing home, it is generally expected that the provider will pay 100% of the costs at the time of hiring. However, the interpretation of the federal regulation allows the provider to reimburse the nurse aide over a reasonable period of time. It is assumed a reasonable period of time can not exceed 12 months. This is based on the pro rata reimbursement rule based on a nurse aide being employed within 12 months of finishing the course.

- 6) Can the facility require that the aide work for them for a certain period of time since they have paid the training costs?

No. Following is an excerpt from the Federal Register preamble for 42 CFR 483.152(c) dated 9/26/91:

Comment: One commenter asked that we allow facilities to have contracts that indicate that nurse aides will have to repay the facility for their training if they do not remain with the facility for a specified period of time.

Response: The cost of nurse aide training and competency evaluation is borne by the Medicare and Medicaid programs. It is inappropriate for a facility to ask a nurse aide to repay the facility for an expense for which it has already been paid.

- 7) What if the aide whose training costs have been paid leaves after one month of employment? Can the facility require the aide to reimburse the facility?

No. See response to questions #1 and #6.

- 8) How does the facility know if another facility has already reimbursed the aide?

This information should be obtained from the previous employer(s) as part of the employment background check completed on an applicant.

- 9) If the aide has an offer of employment not later than 12 months after completing the nurse aide course, can the reimbursement by the facility be prorated? If it has been six months since the course was completed, does the facility reimburse only 6/12ths of the cost?

Yes. Reimbursement for nurse aide training should be prorated over a twelve-month period of time, in accordance with 42 CFR 483.152(c) (2) and 42 CFR 483.154(c) (3), starting from the date the nurse aide completed the training program. If the nurse aide is employed six months after completing the NATCEP, the nurse aide should be reimbursed for the remaining six months of the 12-month period, or 50% of the cost.

- 10) What does "pro rata basis," as used in the cited regulation, mean?

Pro rata basis means proportionate share. The regulation requires that the nursing home provide for the reimbursement of costs incurred on a pro rata basis for the twelve month period of time following completion of the NATCEP for which the nurse aide is employed. It is not required that a nurse aide be reimbursed for any prorated costs during the twelve-month period following completion of NATCEP for which the nurse aide was not employed by a Medicare and/or Medicaid-certified facility. See the response to question one.

- 11) If a facility sponsors the course at no cost to the students, and provides a textbook for the student to use during the course, can the facility charge the aide for the textbook if the aide wants to retain it after the course is finished?

Yes.

- 12) If a facility giving a course employs a student in the class as a trainee II, and the trainee II is not successful in the job, can the facility terminate the trainee II from the job and the course?

As the NATCEP could not have been completed, termination of employment is strictly a personnel issue and beyond the scope of nurse aide reimbursement regulations. According to Health Occupations Credentialing, termination from employment due to unsuccessful job performance is at the discretion of the employer. Termination of the course is not an employment issue and termination from employment alone is not sufficient reason for preventing the student from completing the course.

- 13) If the facility giving a course employs a student in the class as a trainee II, and the trainee II terminates employment, must the facility let them continue in the class?

The response to this question is determined by the Health Occupations Credentialing Program. Termination of employment alone is not sufficient reason to prevent the trainee II from completing the course. See response to question #12.

- 14) What if a nurse aide trainee II working for a facility doesn't pass the test? Does the nursing home still have to reimburse them?

If a nurse aide trainee doesn't pass the test, the person is not a certified nurse aide and would therefore, not qualify for NATCEP reimbursement.

- 15) Nursing facilities purchase books nurse aides can use for the class and don't require that they be purchased. If a nurse aide decides they want to keep their book after class completion, do they have to pay for it then?

Yes, if that is the nursing home's policy.

- 16) A nursing home administrator is under the impression that the nursing home only has to pay for the class for a nurse aide working in their facility and taking the class at the facility. The administrator didn't understand that they must pay for the class, regardless of whether it's at the facility or at a community college.

Federal regulation states that, if an individual who becomes employed by or receives an offer of employment from a facility not later than 12 months after completing a nurse aide competency evaluation program, the nursing home must provide for the reimbursement of costs incurred in completing the program on a pro rata basis during the period in which the individual is employed as a nurse aide.

However, it is a facility's right to determine where it will train its employees and therefore, a facility may elect not to hire an employee that has received training elsewhere.