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October 30, 2020

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Dear Mr. Koski, Mr. Kerwin and Ms. Everett:

We are in receipt of your letter dated October 16, 2020 and appreciate the work of the associations with respect to Hybrid Online Training for Home Health Aides and Personal Care Aides. Your work was instrumental in advancing a response to the changing environment and the disaster emergency. We appreciate having your questions and would like to address the issues and questions you raised in the letter:

Q.1. Address where testing and Supervised Practical Training (SPT) will be completed as training programs may be using different sites for the online component, testing and SPT. How should training programs reflect where SPT will occur and how should programs inform the Department of the various sites that may be used?

A.1. Training programs should complete the Agency Demographics Form and identify where the comprehensive exam, skills assessments and SPT will be completed, as that is the site that is entered into the Home Care Registry (HCR). Training programs that wish to complete these activities at multiple sites should submit an Agency Demographics Form for each site to minimize confusion. A separate application is required for each license number that has a training entity associated with it.

Q.2. Schedules for training are required to be submitted to the regional offices every 6 months on April 1 and October 1. Is this process being changed?

A.2. No changes have been made to the requirements for submission and agencies should continue to submit the required documentation to the regional offices.

Q.3. Is a separate application required for each site utilized by a single program?

A.3. The Agency Demographics Form identifies where the comprehensive exam, skills assessments and SPT will take place. This will be the site address listed in the HCR. For training entities that wish to complete these activities at multiple sites, an Agency Demographics Form must be submitted for each site. A separate application is required for each license number that has a training program.

Q.4. Will training programs continue to be responsible for entering the class roster, dates and other information into the registry?

A.4. Training programs are responsible for maintaining and entering class information into the HCR. The Department will ONLY be entering the training sites associated with the Hybrid Online Training program approval. The Department will enter the site in the HCR using a naming convention that identifies and is specific to the Hybrid program.

Q.5. Please clarify that the address sought refers to competency testing and/or SPT and not testing on the training modules.

A.5. The address refers to the location where competency testing, SPT, skills assessment and the comprehensive exam will be completed.

Q.6. Larger programs anticipate using more than one approved nurse instructor. Should the training program indicate all nurse instructors who will be training?

A.6. The process for adding Nurse Instructors has not changed. There are two separate processes for requesting an addition of a Nurse Instructor: the Home Health Aide Training Program (HHATP), has a nurse instructor application that is handled through the regional office and the Personal Care Aide Training Program (HHATP), does not have an application for nurse instructors as it is handled through the Department's Central Office by emailing the resume and nursing license. The Nurse Instructor Application (HHATP) and documentation and/or approval request for a PCATP Nurse Instructor (PCATP) should indicate that the individual will be training for the Hybrid Online Training Program and indicate their credentials to do so.

Q.7. Please clarify that the schedules requested are only for those components that differ from previously submitted schedules.

A.7. The Department is requiring the full Hybrid Online Training Schedule to ensure that the Hybrid Online Training program meets the minimum criteria and minimum number of hours for training and other Hybrid Online Training requirements.

Q.8. Please confirm that in-person testing refers to assessment of a trainee's competencies and SPT as the didactic portion of the curricula requires multiple quizzes after each module. The proposal submitted to the Department anticipated that the tests after units within the modules would be done through learning management systems which have protocols and safeguards to ensure the integrity of the testing and the student's identity.

A.8. It is not assumed that all training programs will have access to learning management systems with safeguards. Training programs may test students after each module; however, these exams cannot be used to determine if the trainee has passed the didactic portion of the training program. The training program must complete at least one comprehensive exam that is given in person. The comprehensive exam should not use the same questions that were used for the quizzes following the modules. A training program could also choose to give an in-person exam as a "midterm" halfway through the program and a "final exam" at the end of the program. The "final exam" may cover either the remaining content or content from the entire training. The Department expects every training entity to have safeguards in place to protect the integrity of the test questions.

Q.9. If DOH is entering every Hybrid class and it is not entered by the fifth day (per current regulation), we recommend that the provider could then assume approval.

A.9. The Department is <u>only</u> entering the Hybrid Online Training site information. Please note, Advisory Home Care Registry (HCR, dated Mary 4, 2011), changed the time frame from 5 business days to 10 business days.

Q.10 Please verify that students who fail a module can retake the online courses and exams according to policies and procedures developed by the training program, consistent with current guidelines and long-standing policies for training programs.

A.10. Students can retake the courses and exams. Agencies are strongly encouraged to develop a remediation policy specific to their Hybrid Online Training.

Agencies should submit their questions directly to the Department at:
      PCATP: pcatp@health.ny.gov
      HHATP: hhatp@health.ny.gov

        Sincerely,

        Carol A Rodat

        Carol A. Rodat
        Director
        Division of Home and Community Based Services

cc: Mr. Hennessey
       Ms. Deetz
       Ms. Furman
       Ms. McClarren