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EDMUND G. BROWN JR.
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April 18, 2016

To: Nurse Assistant Training Program Applicants

From: Judi Wilkinson, R.N., Chief
Licensing and Certification Program
Training Program Review Unit

Subject: Nurse Assistant Training Program Application Packet

Thank you for your interest in establishing a Nurse Assistant Training Program (NATP) in California. The California Department of Public Health (CDPH), Aide and Technician Certification Section (ATCS), Training Program Review Unit (TPRU), oversees the NATPs. In this packet you will find an application, documents, samples and instructions for completing the School Nurse Assistant Certification Training Program Application (CDPH 276S) and the Skilled Nursing Facility Nurse Assistant Certification Training Program Application (CDPH 276F).

Training Program requirements are found in Title 42, Federal Code of Regulations (42 CFR), Part 483.75 and Subpart D, 483.150 – 483.158 at <http://www.gpoaccess.gov/cfr/index.html>, California Health and Safety Code (CHSC), Section 1337 – 1338.5 at <http://www.leginfo.ca.gov>, and California Code of Regulations (CCR), Title 22, Division 5, Chapter 2.5 at www.calregs.com.

TPRU Representatives are assigned applications for review based on either the county of the Training Program's physical location, or, in Los Angeles, alphabetically by the name of the Training Program name (see link for staff assignments at <http://www.cdph.ca.gov/services/training/Pages/ReviewUnit.aspx>). Training Programs located in multiple counties will be assigned to one Department Representative.

Applications are processed in order of the date received. An applicant notified of an incomplete application has 90 days, from the Department's first review date, to submit all required information. The Department will review a maximum of one initial submission and two resubmissions of documents during the 90 day application timeframe. After 90 days, an incomplete, or otherwise, insufficient, application is denied and a letter detailing the reason(s) for denial is mailed to the applicant.

A thoroughly completed application accompanied by the required documents is essential for program approval. Faxed and email documents will not be accepted for any part of the program application. The NATP must be approved by the TPRU Representative before training can commence.

When completed, mail your application packet for a NATP to:

California Department of Public Health
Licensing and Certification Program
Aide and Technician Certification Section
Training Program Review Unit
MS 3301, P.O. Box 997416
Sacramento, CA 95899-7416

**California Department of Public Health (CDPH)
Licensing and Certification Program
Aide and Technician Certification Section (ATCS)
Training Program Review Unit (TPRU)**

APPLICATION PACKET

The Nurse Aide Training Program (NATP) Application Packet contains the following:

- 1) Approval Guidelines
- 2) List and link to the most updated forms found in the Application Packet
- 3) School Nurse Assistant Certification Training Program Application (CDPH 276S) or Skilled Nursing Facility Nurse Assistant Certification Training Program Application (CDPH 276F)
- 4) Nurse Assistant Training Program Skills Check List (CDPH 276A)
- 5) Daily Nurse Assistant Training Program Schedule (CDPH 276B) and Sample Daily Nurse Assistant Training Program Schedule (CDPH 276B Sample)
- 6) Nurse Assistant Certification Training Program Individual Student Record (CDPH 276C)
- 7) Disclosure of Ownership and Control Interest Statement (CDPH 276D) for privately owned NATPs. Nursing facilities and other educational institutions administered by the Department of Education are not included.
- 8) Director of Staff Development (DSD) for facility based NATPs or Instructor Application for NATPs not located in a facility (CDPH 279). The Director of Staff Development is a term only used in a facility, and the Instructor is the term used in a non-facility training program.
- 9) TPRU Staff Geographic Assignments by County
- 10) Resource Packet

Please assemble all the required documents and submit together in the following order:

When submitting, always use the current form, by using the “Form Link” link found on the TPRU webpage.

http://www.cdph.ca.gov/pubsforms/forms/Pages/CNA_HHA_HemoTechForms.aspx

- School Nurse Assistant Certification Training Program Application (CDPH 276S) **or** Skilled Nursing Facility (SNF) Nurse Assistant Certification Training Program Application (CDPH 276F).
- Four (4) lesson plans selected from different Modules, one (1) of which shall be “Patient Care Skills” from Module Eight (8). The entire lesson plan for each Module must be submitted.
- Nurse Assistant Training Program Skills Check List (CDPH 276A).
- Daily Nurse Assistant Training Program Schedule (CDPH 276B) for the entire Training Program (ensuring that the minimum 150 hours are completed). The Training Program Schedule is implemented for every class session (start to end date). The Sample CDPH276B in the Form Section is for the purpose of illustrating an example of formatting only.
- Nurse Assistant Certification Training Program Individual Student Record (CDPH 276C).
- Disclosure of Ownership and Control Interest Statement (CDPH 276D) required for privately owned NATPs only. Not required for nursing facilities or educational institutions administered by the Department of Education.
- Director of Staff Development (DSD) for facility based NATPs or Instructor Application for NATPs not located in a facility (CDPH 279).
- Clinical Site Agreement (CDPH276E), to be utilized by all non-Skilled Nursing Facility Training Programs for the purpose of providing 100 clinical training hours (validation period – 2 years only).
- Administrative policies and procedures shall be thorough, comprehensive, and specific to the Training Program. See outline of minimally required topics contained in this application packet.

**California Department of Public Health (CDPH)
Licensing and Certification Program
Aide and Technician Certification Section (ATCS)
Training Program Review Unit (TPRU)**

1. APPROVAL GUIDELINES

**Nurse Assistant Certification Training Program Application for Schools (CDPHS 276S) or
Nurse Assistant Certification Training Program Application for Skilled Nursing Facilities
(CDPH 276F):**

If you are a private training program school or an educational institution, submit a completed Nurse Assistant Certification Training Program Application for Schools (CDPH 276S), or if you are a SNF submit a completed Nurse Assistant Certification Training Program Application for Skilled Nursing Facilities (CDPH 276F), including all the required supporting documentation listed on the back of the form. The provider identification training number will be assigned once the program is approved. The provider identification number assigned to the program will correlate to the Training Program Schedule (sequence and hours of classroom and clinical training). An application may only be approved for one training schedule; therefore, multiple training schedules require applications to be submitted and approved for each one.

Applicants may not submit multiple applications at one time. If multiple applications are received, one application will be processed and the NATP will be required to resubmit the additional applications after the first application is approved.

All privately owned NATPs are required to submit the Disclosure of Ownership and Controlling Interest Statement(CDPH 276D). Skilled nursing facilities and educational institutions administered by the Department of Education are exempt from this requirement.

Privately owned training programs may not change ownership because change of ownership terminates the Provider Identification Number, and Providers Identification Numbers are non-transferable. If a privately owned training program has a change of ownership, the existing program must complete the current class and notify the Department in writing. The training program Provider Identification Number will be terminated and the new owner must submit a new application to the Department for review and approval **prior to any future training.**

Director of Staff Development (DSD) or Instructor:

The DSD and Instructor are terms that are synonymous, yet there is a distinction. Although the regulatory requirements regarding Department approval are the same for each designation, the Director of Staff Development provides training for "staff", in the nursing facility; and Instructors provide training for "students" in a NATP. Therefore, the DSD term applies to a nursing facility, and the Instructor term applies to a non-facility based training program.

An LVN or RN may become approved as a NATP Instructor as long as he/she meets the regulatory requirements (see below). In a facility owned/operated NATP, the Department approved DSD (LVN or RN) also provides the NATP instruction, as well as the orientation and in-service to the Nurse Assistants or Certified Nurse Assistants in the facility.

The nursing facility, public educational institution, or private training program is responsible for ensuring that the DSD or NATP Instructor who teaches the NATP meets the regulatory qualifications. When a training program submits a DSD/NATP Instructor application (CDPH279) to the Department without verifying that the applicant meets the qualifications and that the application/resume is accurate, the training program may be considered noncompliant with state regulations and be determined as misrepresenting facts in the application process, which may be the grounds for rejection of the application.

The DSD or Instructor must meet either one of the following qualification requirements:

- 1) One (1) year nursing experience as a licensed nurse **providing direct patient care in a long term care facility**, in addition to one (1) year of experience planning, implementing and evaluating educational programs in nursing;
or
- 2) Two (2) years of **full time** experience as a licensed nurse, at least one (1) year of which must be in the **provision of direct patient care in a nursing facility (definition: Skilled Nursing Facility (SNF), Intermediate Care Facility-ICF, or Intermediate Care Facility-Developmentally Disabled (ICF-DD) or ICF-DD Nursing (ICF-DDN).** Within six (6) months of employment and prior to teaching a certification program, the DSD or Instructor shall obtain a minimum of twenty-four (24) hours of continuing education courses in planning, implementing and evaluation education programs in nursing. These must be courses approved by the Board of Registered Nursing

or courses administered by an accredited educational institution. A transcript of successfully completed course(s) shall be sent to the Department and shall be used as a basis for approval of the qualifications of the DSD or Instructor. A copy of the transcript shall be kept on file at the nursing facility, agency, or public education institution.

Note: The following situations do not meet these regulatory requirements:

- 1) Employment in a SNF holding administrative titles such as a Director of Nurses or Assistant Director of Nurses (for the provision of direct patient care).
- 2) Employment with registry agencies that serve long-term care facilities.
- 3) Hospital employment with nursing experience providing care for geriatric patients, unless the experience is in a Distinct Part/SNF as designated on the hospital license.
- 4) Part-time experience in long-term care.

RN Program Director:

Each NATP must designate a Registered Nurse (RN) who meets the DSD and Instructor qualifications to be designated as the "RN Program Director" for the NATP. In a facility/owned operated the NATP, the DON is usually the RN designated to be responsible for the general supervision of the NATP. The designated RN Program Director is responsible for the general supervision of the NATP. The general supervision should include, but is not limited to oversight of instructors, curriculum, verification of student training, and signing of CDPH 283B after the student successfully completes the training program (attesting that all state and federal training requirements are met).

Copies of the following documents (related to the DSD or NATP Instructor application) shall be submitted to the Department and retained in the training program files.

- 1) Director of Staff Development (DSD)/Instructor Application (CDPH 279).
- 2) A copy of an active nursing license.
- 3) A resume that documents:
 - a) Nursing work experience with time frames from mm/dd/yy to mm/dd/yy
 - b) Name of employer (noting if the health care facility is a SNF, hospital, clinic, etc.)
 - c) Address of employer
 - d) Name of the immediate supervisor that the applicant reported to while working for the employer
 - e) Contact telephone number of Human Resources (HR) or administration to validate the work experience

Failure of the applicant to provide accurate information within the resume to verify meeting the qualifications (including employment experience providing direct care in a **nursing facility**.) **will result in the denial of the application.** Application resubmissions with updated resumes must be accompanied by a written employer notification to verify: a) title, b) dates of employment, c) part-time or full-time employment, and d) description of duties performed.

- 4) A minimum of twenty-four (24) hours of continuing education courses in planning, implementing and evaluation of educational programs in nursing. These courses must be approved by the Board of Registered Nursing or courses administered by an accredited educational institution.
- 5) If the applicant has a **nursing teaching credential**, then submit a copy of the credential for Department review. If the credential is approved, then the twenty-four (24 hours of CEU) DSD course is not required.

WRITTEN CLINICAL SITE AGREEMENT AND SCHOOL CONTRACTS:
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Applicants may submit the CDPH276E (fully executed) as their official clinical site agreement
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Clinical Site Agreement:

The Training Program applicant must have a written agreement with a long term care clinical facility in order to provide the one-hundred (100) hours of clinical training for students. The one-hundred (100) hours of clinical must be obtained in the SNF site and not in a lab setting. The school may have lab practice in the curriculum, but it may not be replaced within the one-hundred (100) clinical hours or the fifty (50) classroom hours. The clinical hours may only be between the hours of 6:00 a.m. and 8:00 p.m.

The facility must be in good standing with the Centers for Medicare and Medicaid Services (CMS) and not have any training enforcement restrictions. If the facility has a two year Nurse Assistant Training Program ban, the clinical site agreement will be void and students will not be able to obtain training in the facility. Therefore, programs should consider having more than one (1) clinical site training agreement; in the event the facility comes under sanctions by CMS they would have an alternate site available. This agreement must be developed jointly with the clinical facility and signed by both parties. The agreement period is for a maximum of a two year (2) year period.

The agreement shall state the responsibility of the training program to the facility and the facility to the training program and shall minimally include:

- A. Nurse Assistant Training Program (NATP) Responsibilities:
 - 1) Prior to direct patient contact in the facility, the student must receive the federally mandated 16 hours of training regarding specific topics.
 - 2) Provide all clinical training and will provide immediate and direct supervision of students.
 - 3) Student to instructor ratio shall not exceed fifteen (15) to one (1).
 - 4) Provide facility with a list of names of all students along with the training schedule that will be followed.
 - 5) Provide all clinical training in the Department approved facility, by a Department approved instructor, while following the NATP approved training program schedule.
 - 6) Provide notice to the facility, that all students have had the physical examination, test for TB (not less than 90 days prior to patient contact) and criminal screening (upon enrollment-to the training program).
 - 7) Training will be provided between the hours of 6 a. m. and 8 p.m.
 - 8) Training will provide a minimum of 100 hours of clinical training in the facility.
- B. Facility Responsibilities:
 - 1) Facility staff may not be used to proctor, shadow, or teach the Training Program students.
 - 2) Facility nursing staff will not be decreased because students are training in the facility.
- C. Both parties agree to:
 - 1) Provision for adequate notice of termination.
 - 2) Both entities must agree to comply with all local, state and federal laws and regulations.
 - 3) Names and addresses of both parties, including signatures and dates.

CONTRACT:

When a Skilled Nursing Facility (SNF) hires nurse assistants (that are not yet certified) and does not want to provide in-house NATP training, then the SNF will seek out an outside entity, (Department approved NATP) to provide the training to its nurse assistant employees, then a **contract** is required between the SNF and the NATP. The contract must have adequate provisions to describe the responsibilities of the Department approved NATP to the SNF, and must be approved by the Department. The elements of a contract are similar to the components of the clinical site agreement (as noted above), except that the NATP will provide all classroom and clinical training. The contract will also describe the address/location where the classroom training will occur. If the classroom training will occur at the SNF location, then the contract must also specify the area of the facility which will be used for the instruction, and provide a copy of the lease/rental agreement for the facility space. The area must not be licensed as patient/resident space; and must have a separate entrance and egress for students. This area must not infringe on patient/resident privacy. The Department will determine if the space can be approved for classroom student use.

In addition, the NATP shall not use facility personnel as preceptors or instructors. NATP instructors must not be employees of the facility while teaching. The SNF DSD may teach an evening or weekend class for the NATP school if not employed during those hours with the SNF. The Director of Nursing (DON) in the SNF may not be a NATP instructor, since the DON of a facility is employed full-time and has a twenty-four (24) hour responsibility to the SNF.

Physical Health Examination

Each student enrolled in the certification program shall have a health examination which includes a medical history and physical examination, a purified protein derivative, intermediate strength intradermal skin test for tuberculosis, unless medically contraindicated. If a positive reaction is obtained, a chest x-ray shall be taken, unless medically contraindicated. A report signed by the examiner shall indicate that the student does not have any health condition that would create a hazard to themselves, fellow employees, or patients. This examination shall be completed and documented prior to the students having direct patient care contact in the clinical setting. This information shall be provided to the nursing facility prior to patient contact. The physical health examination must be done within **90 days prior** to clinical training/direct patient contact.

Certified Nurse Assistant Application and Live Scan:

Upon enrollment in a Training Program for nurse assistant certification, and prior to direct patient contact with residents, a candidate for training shall submit a training and examination application and proof of Live Scan fingerprinting to the Department.

Policies and Procedures:

Required for all Training Programs Types: Facility, Educational Institution, Private Entity)

Training programs are required to develop and implement policies and procedures to govern its operation, administration and management. All policies shall be reviewed annually and revised as often as the training program determines necessary. A copy of these written policies shall be submitted to the Department during the initial application review and any other time requested by the Department. The P&P Manual must be presented in a complete, consolidated, organized fashion and not submitted piecemeal. Each policy must address the following components: 1) purpose, 2) scope-who the policy is applicable to, 3) persons responsible for the policy, and 4) the itemized procedural steps (describing who, what, when, how) regarding the NATP operation. The P&P must include a "Table of Contents Page" and a separate "Forms Section". All pages must be numbered, and each policy should be contained on separate pages. Include all forms used in the program in the "Forms Section". The Department must be able to clearly identify all elements of each policy and make a determination of its content. Failure to submit a detailed, comprehensive, organized P&P Manual, which meets the above provisions, will result in a the non-approval of an initial application and can also result in the termination of an existing approved NATP.

Policies and Procedures must include at least, but not be limited to the following:

- 1) Policy regarding the development, implementation, changes and annual review of the P&P Manual.
- 2) Job descriptions of all staff responsible for the administration/management NATP to minimally include: Administrator, Instructors and RN Program Director and any additional positions listed in the NATPs policies and/or organizational chart.
- 3) Policy regarding RN Program Director oversight of multiple NATP location or outside employment. When the Training Program hires a RN Program Director that functions as a Program Director at more than one (1) location (multiple NATPs), then the duties in the job description need to detail how the RN will provide the oversight for multiple schools. The request for approval for more than one (1) RN Program Director per NATP School will be reviewed on a case by case basis.
- 4) Organizational Chart Submission: Submit an organizational chart showing person in charge of the Program and all others that have authority/responsibility of the NATP. Titles listed on the organizational chart must match the titles within the policies, as well as any position listed in the policies should be listed on the organizational chart.
- 5) Policy for Monitoring Training Program, including monitoring Instructors. Policy to describe how the training program monitors the entire training program per its policies, including the evaluation of the Instructors. Instructor monitoring would minimally occur at least once during theory and once during clinical for each class session.
- 6) Policy related to theory training; best practice would include that each Module is taught in its entirety prior to clinical.
- 7) Policy related to clinical training. Include in the policy that the ratio of students shall not exceed fifteen (15) students to one (1) instructor.
- 8) Policy related to Student Absenteeism and Make-up Classes. Make-up time must be hour for hour with instructor present, and theory make-up must occur prior to clinical. Make-up time must be "well defined" as per the maximum number of hours that can be made up, and the make-up time must be reflected on the Training Schedule (CDPH276B).
- 9) Policy regarding Criminal Background Clearance and the submission of the CDPH283B (CNA Application) upon enrollment of the NATP.
- 10) Policy regarding school advertising, including that the training program shall not make any false or misleading claims or advertisements.
- 11) Policy regarding the NATP Training Schedule (CDPH276B). Minimally include responsibility, development, Department approval, and implementation.
- 12) Policy regarding physical health examination and screening requirements. Physical exam and TB testing must be done no earlier than 90 days prior to enrollment/start of clinical.
- 13) Policy related to Forms and Retention. Specifically list and provide detailed information regarding all forms maintained/retained by the NATP (4 years). This would include who is responsible for the forms and record keeping, how/when the forms are filled out, secured location were stored. All forms are to be itemized in the "Form Section".
- 14) Policy that the NATP will only refer their students to the CDPH approved CNA Competency Testing Vendors, for their CNA test/exam.

**California Department of Public Health (CDPH)
Licensing and Certification Program
Aide and Technician Certification Section (ATCS)
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**2. LIST AND LINK TO THE MOST UPDATED FORMS FOUND
IN THE APPLICATION PACKET**

- School Nurse Assistant Certification Training Program Application (CDPH 276S)
- Skilled Nursing Facility Nurse Assistant Certification Training Program Application (CDPH 276F)
- Nurse Assistant Training Program Skills Check List (CDPH 276A) Sample Form
 - Sample may be copied and used by the Training Program
- Daily Nurse Assistant Training Program Schedule (CDPH 276B) and Sample Daily Nurse Assistant Training Program Schedule (CDPH 276B Sample)
- Nurse Assistant Certification Training Program Individual Student Record (CDPH 276C)
 - Sample may be copied and used by the Training Program
- Disclosure of Ownership and Control Interest Statement (CDPH 276D)
- Nurse Assistant Training Program (NATP) and/or Home Health Aide Program (HHP) Clinical Site Agreement (CDPH276E)
- Director of Staff Development (DSD)/Instructor Application (CDPH 279)
- TPRU Staff Geographic Assignments

Current forms listed above are located on the CDPH website:

<http://www.cdph.ca.gov/pubsforms/forms/Pages/LC-AllForms.aspx>

**California Department of Public Health (CDPH)
Licensing and Certification Program
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3. NURSE ASSISTANT TRAINING PROGRAM APPLICATION

**Nurse Assistant Certification Training Program Application for Schools (CDPHS 276S) or
Nurse Assistant Certification Training Program Application for Skilled Nursing Facilities
(CDPH 276F):**

California Code of Regulations (CCR) Title 22, Section 71835(n) specifies the mandatory theory and suggested clinical hours for each module. The Nurse Assistant Certification Training Program Application for Schools (CDPH 276S) and the Nurse Assistant Certification Training Program Application for Skilled Nursing Facilities (CDPH 276F) are two (2) sided forms. Enter the theory and clinical hours in your training schedule on page two (2) which requires the total number of hours for each of the sixteen (16) Modules. California requires one-hundred and fifty (150) hours of training to complete the program. The minimum total number of hours is fifty (50) hours of theory and one-hundred (100) hours of supervised clinical training.

You may choose to provide additional hours of training in which case you must show how you are using the additional hours on your Training Program schedule discussed later in this guidance. Lab hours may be used in the curriculum, but it may not be counted in the classroom or clinical hour (150 hour) requirement. Return skill demonstration by the students shall be under the immediate supervision of the approved DSD/Instructor, while performing direct patient care. If the facility clinical site does not allow students to perform mandated skills required for course completion, the demonstration of the skill may be performed through a simulation evaluation by the approved DSD/Instructor. However, it should only be a rare occasion that the simulation evaluation method is utilized. Immediate supervision is defined as the instructor “not only being in the same building, but present while the person being supervised demonstrates the clinical skills.”

Required materials with the application:

- 1) The applicant is required to submit four (4) lesson plans elected from different Modules, one (1) of which shall be “Patient Care Skills” from Module eight (8). A lesson plan must include all topics within the entire module, which shall include:
 - a) The student behavioral objective(s)
 - b) Descriptive topic content with adequate detail (method, technique, procedure) to discern what is being taught
 - c) The method of teaching
 - d) The method of evaluating knowledge and demonstrable skills
- 2) A sample of the skills return demonstration record used during clinical for each trainee which shall include:
 - a) A listing of the duties and skill the nurse assistant must learn
 - b) Space to record the date when the nurse assistant performs each duty/skill
 - c) Spaces to note satisfactory or unsatisfactory performance
 - d) Signature or the approved DSD/Instructor

**See Nurse Assistant Training Program Skills Check List (CDPH 276A).*

- 3) A sample of the individual student record used for documenting theory raining.

**See Nurse Assistant Training Program Individual Student Record (CDPH 276C).*

- 4) A day to day schedule of training which lists theory topic and hours and clinical objectives and hours for the entire course. It is recommended that lab hours be added to the curriculum so that skill demonstration and practice may occur prior to the clinical setting; however, the skill demonstration for competency must be performed in the clinical setting on residents/patients and signed by the Department approved Instructors.
- Make-up time must be included in the training schedule, and any theory that has been missed must be made up by the student prior to clinical. Make-up time is made up hour for hour, and must be overseen by the instructor. The make-up must cover the same content that was missed, following the Module lesson plan. The training program must create a policy that limits the amount of absence and makeup that will be allowed.
 - Once the training schedule is approved by the Department, this is the **only** schedule that the Training Program can use. If the Training Program desires to change the schedule (sequence of modules or provide the training at a different time (weekend vs. days), then the Training Program must submit the new training schedule to the Department for approval prior to implementing the change in the schedule. Once reviewed and approved, the updated schedule will be replaced with the previously approved schedule.
 - During any onsite visits, the Department will make a determination if the school is implementing the approved training schedule. There is only one (1) approved training schedule for each provider identification number assigned to each NATP.

**See Sample Daily Nurse Assistant Training Program Schedule (CDPH 276B Sample). This Sample shows the formatting of how the training schedule should be developed; it is not representative of the first week of training.*

Please give considerable attention to the required Training Program Schedule. The schedule must be in detail for the TPRU Representative to determine what is being taught on a specific date and time.

Application Process Onsite Visit:

Once the TPRU Representative has determined that the application is complete, he/she will arrange an initial visit of the Training Program site. During the onsite visit, interviews with the NATP staff (including Administrator, RN Program Director and Instructors) will be conducted. This includes the review of any additional training materials and lesson plans; and key program personnel must have operational and regulatory knowledge regarding all components related to the NATP.

The onsite visit will also include observations of the classroom and student record storage areas, including laboratory equipment utilized in the demonstration of student skills. It is expected that the training program has the same clinical equipment available as the nursing facility, to demonstrate the skills taught in the classroom setting.

Based upon observations of the physical site and interviews with key Training Program personnel, a determination will be made whether the Training Program will be approved or disapproved.