



Long-Term Care Regulatory Provider Letter

Number: PL 2023-16 (revised)
Title: NATCEP Survey Process
Provider Types: Nurse Aides
Date Issued: June 20, 2024

1.0 Subject and Purpose

Effective October 1, 2023, the Licensing and Credentialing division of HHSC Long-term Care Regulation is performing regular surveys on Nurse Aide Training and Competency Evaluation Programs (NATCEPs) to ensure compliance with the NATCEP federal regulations at 42 CFR [§484.151](#) and state rules at 26 TAC [Chapter 556](#). This letter provides guidance regarding how the NATCEP survey process takes place. It has been revised to include updated rule references due to revisions made to 26 TAC [Chapter 556](#) (Nurse Aides), effective March 17, 2024.

2.0 Policy Details & Provider Responsibilities

To prepare for the surveys, NATCEP staff should familiarize themselves with the survey process, which includes scheduling, entrance, information gathering, record review, interview, and conclusion and may also include a plan of correction if HHSC finds deficiencies during the survey.

2.1 Scheduling

NATCEP reviews may be announced and scheduled or unannounced and unscheduled, according to need. Initial NATCEP reviews must be completed in person within two years of the program's approval date, and every two to three years virtually thereafter to comply with NATCEP renewal. If a NATCEP makes substantial changes within the two-year renewal period, HHSC will complete a review virtually before renewing the program's approval. The term "substantial changes" is

defined as more than three changes within a two-year renewal period that include a change in administrative authority, classroom location, program director, or program instructor.

2.2 Arrival and Entrance Conference

Upon arrival, the surveyor will speak to the staff member in charge of the NATCEP or their designee. This should be the program director, program instructor, or the designee if the program director and program instructor are not available. The surveyor will explain the purpose of the visit (e.g., initial on-site review, renewal review, complaint), briefly explain the survey process, and review the NATCEP Entrance Conference Worksheet (Attachment 1). All items on NATCEP Entrance Conference Worksheet must be provided within one hour of entrance. The review is conducted in the following order unless there is a need to do otherwise:

- tour of the NATCEP and clinical site or sites, if visiting a facility-based program¹
- record review
- interview with designee

2.3 NATCEP and Clinical Site Tour

The surveyor will tour the program or facility with the NATCEP designee and observe any students that may be in training, listening to ensure that the information is accurate and reflects what is listed in the curriculum. The surveyor will observe the director, instructors, and students, and complete a review of the Equipment Checklist (see Attachment 2). When reviewing the Equipment Checklist, the surveyor will ask the NATCEP designee to show the surveyor the equipment.

If the clinical site is separate from the NATCEP, the surveyor will tour it separately. They will observe any students in training and complete the equipment checklist, as performed at a facility-based program.

¹ If the NATCEP is non-facility based, the visit and tour of the clinical site will take place last.

2.4 Record Review

The surveyor will complete a review of the records listed on the NATCEP Entrance Conference Worksheet. These will include a list of program staff, its curriculum, class schedule, proof of documentation that the NATCEP meets requirements for trainee verifications, performance records for students, and, where applicable, a copy of written policies and procedures for online classroom training and records of trainees' in-service education.

2.5 Interview with NATCEP Director or Designee

The interview with the NATCEP director or their designee may take place in person or virtually. During the interview, the surveyor will attempt to determine whether the program meets requirements in rule for the following:

- training curriculum, including the number of total clinical and classroom hours, and instructor-to-trainee ratio;
- verification of trainee identity and background check;
- method of ensuring protection of trainees' privacy and personal information;
- appropriate supervision of trainees and method of ensuring that trainees perform their work according to training content and timelines;
- documentation of trainee performance record and training completion;
- in-service training records, where applicable;
- credentials and duties of program Director, Instructor(s), and Supplemental Trainers; and
- means of ensuring that clinical sites are in good standing with HHSC and are maintained with the necessary equipment for training.

The minimum question set for the interview with the NATCEP Director or their designee is included here as Attachment 3.

2.6 Survey Conclusion/ Exit Conference

Before leaving the NATCEP, the surveyor will notify the designee of the survey's conclusion and advise them of any missed requirements

identified during the review. The NATCEP will receive final survey documentation via email within 10 business days.

2.7 Deficiencies

If the surveyor finds that any NATCEP requirements are not met, he or she will cite deficiencies and email a deficiency notice letter along with a Statement of Deficiencies to the NATCEP. The NATCEP will have 10 business days to respond to the deficiency notice and provide a Plan of Correction (POC), if applicable. If the NATCEP does not respond or fails to correct the deficiency or deficiencies, the surveyor will send a second notice to the NATCEP, which will then have 20 working days to respond. If a NATCEP provides adequate response to the notice, the NATCEP survey will be approved. If the NATCEP fails to respond, then the NATCEP will be withdrawn from HHSC approval.

2.8 Plan of Correction

NATCEPs are required to address the following in a POC for each deficiency cited:

- What corrections were made?
- How was the corrective action accomplished?
- What measures were put in place or what systemic changes were made to ensure that the deficient practice does not reoccur?
- How will the corrective actions be monitored to ensure the deficient practice is being corrected and will not reoccur? and
- What date was the deficient practice corrected on?

The surveyor will review the POC and provide notice to the NATCEP upon its approval.

3.0 Background/History

Historically, NATCEP reviews were conducted by Survey Operations staff. This function is moving to dedicated staff in the Licensing and Credentialing unit.

4.0 Resources

Attachment 1 – NATCEP Entrance Conference Worksheet

Attachment 2 – NATCEP Equipment Checklist

Attachment 3 - Minimum Question Set for Interview with NATCEP Director or Designee

5.0 Contact Information

For questions about the NATCEP survey process to be completed by LTRC credentialing staff, please contact the NATCEP program by email at Regulatory_NATCEP@hhs.texas.gov.

If you have any questions about this letter, please contact the Policy and Rules Section by email at LTCRPolicy@hhs.texas.gov or call (512) 438-3161.

Attachment 1: NATCEP Entrance Conference Worksheet

Records and Information NATCEP must provide within one hour of entrance		26 Texas Administrative Code (TAC)
	Document that includes the following: <ul style="list-style-type: none"> • Name of program director • Names of program instructors • Names of supplemental trainers • Names and locations of clinical sites 	§556.5 §556.3(d)
	Texas Nurse Aide Curriculum for Long Term Care Facilities (paper or electronic copy)	§556.3(p)
	All class schedules for the past two years to show number classroom and clinical hours taught	§556.3(n)
	Online policy & procedure if the NATCEP provides online classroom training	§556.3(o)(2)
	Proof or records that document that the NATCEP verify the following trainee requirements: <ul style="list-style-type: none"> • Are not listed on the Nurse Aid Registry in revoked status. • Are not listed as unemployable on the Employee Misconduct Registry established pursuant to Texas Health and Safety Code, Chapter 253. • Have not been convicted of a criminal offense listed in Texas Health and Safety Code §250.006. 	§556.3(u)
	Performance records for each student trained from initial approval date of NATCEP or if review is for renewal, performance record for each student trained in the last two years. (Located in the Nurse Aide Curriculum, Appendix B. Texas Nurse Aide Performance Record)	§556.3(x)
	Class training records that include: <ul style="list-style-type: none"> • Dates and times of all classroom and clinical hours. • Full name and Social Security Number of each trainee. • Record of the date and time of each classroom and clinical training session a trainee attends; (Electronic record is acceptable.) • Final course grade for the training portion of the NATCEP that indicates pass or fail. • Physical or electronic sign-in record for each classroom and clinical training session. An electronic sign-in must include a form of identity verification for the trainee conducted in compliance with the requirements of subsection (i)(2) (Example, Nurse Aide Curriculum, Appendix C. Nurse Aide Training Program Daily Sign-in Record). 	§556.3(y)(1)
	Class training records for in-service education that include: <ul style="list-style-type: none"> • Hours provided 	§556.9(e)(4)(b)

	<ul style="list-style-type: none">• Training content, training include training in geriatrics and the care of residents with a dementia disorder, including Alzheimer's disease.	
	Provide location of equipment and supplies for training. Provide location of equipment and supplies for clinical site.	§556.9(d)

Attachment 2: NATCEP Equipment Checklist**NATCEP Equipment List as noted in the HHSC Nurse Aide Curriculum for Long Term Care Facilities**

- Mannequin or residents to practice skills
- PPE = Disposable Isolation Mask, Gown and/or Gloves
- Handwashing station with soap
- Feeding = Food plates, feeding utensils, napkins, glass for drinking
- Resident bed with different position settings, guard rails, wheel locks,
- Resident signal device
- Privacy curtain, screen, or door
- Bed linens, sheets, blankets, pillows
- Thermometer (Oral & Axillary)
- Blood Pressure = stethoscope, electronic Blood Pressure Monitor (BPM)
- Clock with second hand
- Scale to measure resident's weight
- Bathroom or bedside commode, toilet paper, bedpan, urinal
- Tub or Shower, Wash basin for bed bath
- Wash Rags and Towels
- Catheter for Catheter care
- Mouth Care = Tooth Brush, Tooth Paste, Denture for Denture Care.
Denture brush
- Hair Care = Shampoo, Brush, Comb
- Shaving equipment = razor, shaving cream
- Fingernail and Foot Care = Nail clippers, file
- Knee High Elastic Stocking, socks
- Collection bags
- Urine Collection container
- Stool Collection container
- Clear graduate container marked with cc's for measuring urine
- Toilet paper
- Wheel Chair
- Resident Chair
- Transfer belt or gait belt
- Draw Sheet for transferring resident
- Walker and Cane

Attachment 3: Minimum Question Set for Interview with NATCEP Director or Designee

Question	26 TAC Ch. 556
<ul style="list-style-type: none"> • Does the program consist of at least 60 classroom hours? • Does the program consist of at least 40 clinical hours and at least one program instructor for every 10 trainees? 	§556.3(n)
<ul style="list-style-type: none"> • How does the online training verify a trainee's identity? • How does the online training ensure protection of a trainee's privacy and personal information? • Does the online training document the hours completed by each trainee? 	§556.3(o)(2)
<ul style="list-style-type: none"> • Does the NATCEP teach from the Texas Curriculum? • How do you ensure that any changes made to the Texas Curriculum is reflected in the NATCEP training? 	§556.3(p)
<ul style="list-style-type: none"> • What is the NATCEP process for verifying that a trainee: <ul style="list-style-type: none"> • Is not listed on the NAR in revoked status? • Is not listed as unemployable on the EMR? • Has not been convicted of a criminal offense listed in Texas Health and Safety Code (THSC) §250.006(a) or convicted of a criminal offense listed in THSC §250.006(b) within the five years immediately before participating in the NATCEP? 	§556.3(u)
<ul style="list-style-type: none"> • How does NATCEP ensure that trainees: <ul style="list-style-type: none"> • Complete the first 16 introductory hours of training (Section I of the curriculum) before having any direct contact with a resident? • Only performs services for which the trainee has been trained and has been found to be proficient by a program instructor? • I under the direct supervision of a licensed nurse when performing skills as part of a NATCEP until the trainee has been found competent by the program instructor to perform that skill? • Is under the general supervision of a licensed nurse when providing services to a resident after a trainee has been found competent by the program instructor; and is clearly identified as a trainee during the clinical training portion of the NATCEP? 	§556.3(v)
<ul style="list-style-type: none"> • Does the program use the required performance record and give a copy to each trainee? 	§556.3(x)
<ul style="list-style-type: none"> • Does the program charge employees for any portion of the training? <ul style="list-style-type: none"> • Facility-based NATCEP – answer should be none • Other NATCEPs – can charge 	§556.3(z)
<ul style="list-style-type: none"> • Does the NATCEP provide in-service education? If so, does it include training in geriatrics and the care of residents with a dementia disorder, including Alzheimer's disease? 	§556.9(e)(4)(b)
<ul style="list-style-type: none"> • What is the name of your Program Director? 	§556.5(e)

<ul style="list-style-type: none"> • Does the program director meet the following requirements? <ul style="list-style-type: none"> • Licensed as an RN in Texas? • Have a minimum of two years of nursing experience? • Have a least one year of experience in the provision of long-term care services in a facility? • Have completed a course in teaching adults or have experience in teaching adults and supervising nurse aides? 	<p>§556.5(b)</p>
<ul style="list-style-type: none"> • Is the program director of the NATCEP the DON of the facility? • If yes, does the DON perform any of the training? (Note: the DON cannot perform the training, a deficiency will have to be written and the NATCEP will have to have an approved instructor.) 	<p>§556.5(e)(1)</p>
<ul style="list-style-type: none"> • How does the program director: <ul style="list-style-type: none"> • Provide direction to the NATCEP? • Directly perform the training or supervise the program instructor and supplemental trainer? • Ensure that the NATCEP records are maintained? • Determine if the trainees have passed the training portion of the NATCEP? • Sign a competency evaluation application (or text application) completed by the trainees who pass the training portion of the NATCEP? • Sign a certificate of completion or a letter on letterhead, at the request of the an eligible trainee that includes the date training was completed, the total training hours completed, and the official NATCEP name and number of file with HHSC? • Completion of the classroom training for trainees who complete the HHSC CBT is determined by the certificate of completion, which includes the date the trainee completed the CBT. 	<p>§556.5(e)(3) (A)-(G)</p>
<ul style="list-style-type: none"> • Program Instructor <ul style="list-style-type: none"> • How many program instructors do you have? • How does the director ensure that program instructors meet the requirements? 	<p>§556.5(f)</p>
<ul style="list-style-type: none"> • Supplemental Trainer <ul style="list-style-type: none"> • How many supplemental trainers do you have? • How does the program director select and supervise each trainer? 	<p>§556.5(g)</p>
<ul style="list-style-type: none"> • Clinical Sites - Clinical training must be completed in an HHSC approved facility. The clinical site must have all necessary equipment needed to practice and perform skills training. <ul style="list-style-type: none"> • Provide the facility name, address, facility type, facility ID/license number. • How does the NATCEP ensure that the clinical site has the required equipment to provide all of the training? • How does the program director ensure that a nursing facility that has a prohibited condition as defined in 42 CFR 483.151 is not used as a clinical site? • Does the NATCEP use a laboratory setting for clinical training? • Provide the address of the laboratory setting. • Does your laboratory setting have the required equipment to provide all the training? 	<p>§556.3(d)</p>