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Instructions for Nurse Assistant Training Program (NATP) Policy and Procedure (P&P) Manual development
Sample policy format
Definitions and differences between policies and procedures
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INSTRUCTIONS FOR NURSE ASSISTANT TRAINING PROGRAMS (NATPs) – POLICY AND PROCEDURE MANUAL DEVELOPMENT

Per California Code of Regulations, Title 22, Section 71828, NATP providers must develop and implement written administrative and management policies governing the program. The Department may, at any time, review the NATP policies to ensure:

- Compliance with Department regulations/requirements
- NATP staff have fundamental operational and regulatory knowledge

The Department may provide a maximum of 3 reviews of each policy prior to a deadline for completion. Policies must be clear, complete, organized and specific. Failure to obtain approved policies and procedures prior to a deadline for completion will result in NATP application dental or program termination.

To submit an NATP policy manual for review, ensure items below are met:

- Include a "Table of Contents" page that lists each policy on separate pages.
- Format pages consistent with the example provided by this document.
- Sequentially number all pages of the manual, and label the top of each page with the school name.
- Label all forms and provide a list at the end of the Policy/Procedure Manual in a "Forms Section".
- Each policy must include and clearly specify:
  - ✓ A policy statement indicating the specific regulations, requirements, or modifications to organizational behavior that the policy is creating. What is the rule the employees must follow?
  - ✓ A purpose statement, outlining why the organization is issuing the policy or making this rule?
  - ✓ An applicability and scope statement, indicating which parties are responsible for carrying out the policy.
  - ✓ Itemized procedural steps detailing the process and identifying who, what, when, where, & how. The details provided should include adequate instruction for the responsible employee to follow and carry out their job functions and responsibilities as stated in the policy

- ✓ An effective date, which indicates when the policy comes into force.
- ✓ Submit portions of the student handbook pertaining to admission, criminal background clearance, physical exam, attendance and course completion
- ▪ Submit portions of the student handbook only pertaining to:
  - Requirements for student admission and completion
  - Criminal background clearance
  - Physical exam
  - Attendance and absenteeism

P&P manuals that do not include the basic items listed above will not be accepted for review. Please note these additional instructions and tips before submitting.

- Submit the entire policy manual/booklet via regular USPS mail to the address at the bottom of this page.
- Failure to follow these directions will result in non-approval of policies and eventual denial of the NATP application or termination of a currently approved NATP.
- Applications that are not complete and approved by the "Deadline Date for Completion and Department Approval" will be denied.
- Certified mail and overnight mail prolong the receipt process and may not be received prior to the approval deadline.

The Policy and Procedure Manual must minimally include complete policies for the following:

1) Policy and Procedure Manual
   A. Policy development, implementation, and changes, updates, and annual review of the P&P manual.
   B. Identify who is responsible for each function and how the training program NATP will ensure staff has adequate knowledge of policies.
   C. Identify who is responsible to ensure staff knowledge of requirement "a"
   D. Provide specific details in order for staff to carry out the policy
   E. Indicate timeframe when annual P&P review occurs
   F. Describe how annual review is performed
   G. Include the audit form used for P&P development, renewal, or updating (See CDPH Sample Policy and Procedure format.)
   H. How P&P affects a student's physical, background clearance, admission, attendance, absenteeism, or program completion—which are explained in the student handbook and submit these sections with the application   NOTE: The Department cross references P&P with applicable student handbook sections.

2) Staffing
   A. Include job Descriptions/qualifications/duties for all staff with NATP duties. Minimally this shall include RN Program Director, NATP Instructor, Administrator/Owner, and any other NATP staff.

B. Job titles listed in the NATP P&P must match and be included organizational chart (see item "3a" below)
C. Instructor and RN Program Director qualifications, the approval process and license requirements must be included.
D. Each responsibility listed in the other policies should be included in the job description for the appropriate individual.
E. In smaller organizations, one individual may hold two or more job titles – Include qualifications and job description for each required job title even when one employee will fill two jobs.
F. Indicate how NATP Instructors and RN Program Directors meet California Code of Regulation, Title 22, Section 71829 requirements, to include the approval process and license requirements.

3) **Organizational Chart – Development, Changes, and Maintenance**
   A. In addition to the policy, include an organizational chart that indicates all job titles and lines of authority
   B. Job titles on the organizational chart must match job titles listed in P&P and minimally include the Administrator/Owner, RN Program Director, Instructor as well as any other positions or job titles providing support to the NATP should be included

4) **School Advertising**
   A. The policy minimally includes a statement that an NATP shall not make false or misleading claims or advertisements regarding training.
   B. The NATP many not advertise or guarantee certification to students
   C. Include the compliance monitoring process for advertising and the person responsible
   D. Include the monitoring requirements and process and the person responsible
   E. Describe how and when monitoring is to be performed.

5) **Student Enrollment**
   A. Initial application process at time of enrollment to include
      i. Submission of CDPH 283B (CNA/HHA) application form, Live Scan BCIA8016 form, an CDPH 283I form to the Department's Aide and Technician Certification Section Registry upon student enrollment.
   B. Criminal background clearance requirement and process
      i. All students must complete Live Scan fingerprinting upon enrollment and prior to beginning clinical training or direct contact with patients.
      ii. Detail the process for completion and submission of initial CDPH 283B
      iii. Students fill out top portions (Section I-III) of CDPH 283B application
      iv. NATPs fill out (Section IV)
      v. Indicate details of submission procedures - who is responsible to submit CDPH283B to the Department
      vi. Passage of SB1384 (Chapter 847, Statuses of 2014), contains important information regarding the criminal background requirements. Applicants are encouraged to read this senate bill and incorporate these requirements into the policy and procedure manual. The "Disqualifying Penal Code Sections" list no longer applies to CNA's and NATP applicants.

C. **Health Requirements include**
  i. Gathering Medical History
  ii. Physical examination
      (1) Within 90 days prior to student participation in segments of the program involving, direct contact with patients.
      (2) Include details for determining that the individual is free of active tuberculosis disease as per tuberculin infection testing method(s) recommended by the Federal Centers for Disease Control and Prevention (CDC) and licensed by the federal Food and Drug Administration (FDA).
          a) If that test is positive, an x-ray of the lungs must be performed and a certificate from the examining practitioner indicating the individual is free from active tuberculosis must be obtained.
      (3) A report must be signed by the physician, physician's assistant or nurse practitioner, and shall be provided to the nursing facility. This report shall indicate "the student does not have any health condition that would create hazard to himself, fellow employees, or patients."

6) **Training Requirements**
  A. Development and implementation of training program schedule
    i. Training schedule must include all required hours, modules, components and skills per Title 22, Section 71835(n) and California Health Safety Code (CHSC) Division 2, Chapter 2 Article 9, Section 1337.1 as well as the document revision date.
    ii. Schedule must include designated makeup times to cover allowable absences per attendance policy.
    iii. Procedure must include sufficient detail to guide the responsible employee in the development, approval and implementation of the Training Section (50 hours of theory and 100 hours of clinical) as approved by the Department.
    iv. P&P must demonstrate that applicant understands the Federal requirements that must be met prior to clinical skills training and required hours and components that must be met prior to clinical skills training and required hours and components for course completion
    v. All training schedules must be approved by the Department prior to implementation
    vi. The School may include lab practice in the curriculum – lab practice cannot be counted towards the theory or clinical training hours

  B. **Classroom theory training**
    i. Classroom training may only be provided at the theory classroom location approved for use with a specific NATP identification number.
    ii. Classroom training must follow the curriculum, lesson plans and NATP schedule that has been approved by the Department for use with this specific training program.
    iii. Federally required 16 hours of theory training must be completed prior to direct patient care in the clinical class.

    iv.   The policy must list the module components that are to be covered during the training and who will be responsible for verifying that each student has completed the training prior to start of clinical training.

    v.   Standardized forms must be used to document all theory training.

        (1) The policy must establish whether the NATP will use the CDPH276C (Individual Student Record) or if the NATP has developed an alternate form for this purpose.

        (2) If an alternate form is to be used, the policy must instruct employees on the requirements regarding development, required Department approval prior to use, proper use procedures, implementation. Minimally, this document must contain all information as shown on the current CDPH 276C.

        (3) All documentation of student progress must be hand-written.

    vi.   The policy must establish which curriculum the NATP will be following.

        (1) If the NATP chooses to use a curriculum other than the Model Curriculum listed on the Department website, the P&P must include information regarding the process and responsibilities for the development, implementation and evaluation of this curriculum.

        (2) Identify if lesson plans are from a model curriculum or will be developed by the NATP. If the policy states that the NATP will develop the curriculum including lesson plans, identify the responsible staff and the procedures, they must follow in order to plan, develop and implement the curriculum used.

    vii.   Student attendance (sign-in/sign out) sheets must be developed, implemented and maintained for all days of theory and training, and include date, printed/typed name of student, student's signature (beginning and end of each theory day), and name and signature of instructor.

C. Clinical Training

    i.   All clinical training must be completed at the Department approved clinical training facility between the hours of 6am and 8pm.

    ii.   P&P to include must detail rules and processes surrounding clinical site approval, compliance methods to ensure adherence to training schedule and skills are met per Title 22, 71835.

    iii.   Student to instructor ratio not to exceed fifteen to one (15:1) while instructor provides immediate and direct supervision to students and has no other duties. P&P must address procedure to ensure compliance.

    iv.   NATP follows CDPH 276B Training Schedule, to ensure all clinical modules, skills and 100 hours are met, per Title 22, §71835.

    v.   All clinical modules and lesson plans are available for instructor use and Department review upon request.

    vi.   Identify NATP personnel responsible to implement chosen curriculum and lesson plans.

    vii.   If the NATP policy is to establish a customized curriculum, the policy must include all details for curriculum development.

    viii.   Clinical Instructor must provide demonstration of clinical skills at the nursing facility (Department approved clinical site) and performs student return evaluations of all skills on CDPH276A or Department approved Student Skills Checklist at the nursing facility

    ix.   All skills evaluated by Department approved Clinical Instructor with hand-written documentation, on the date the skill was performed

    x.   All skills to be successfully demonstrated by the student, on a facility resident, with the Department approved Instructor present

    xi.   Simulation process and exception requirements can be utilized, if a skill cannot be demonstrated on a resident in the facility and P&P allows for and details the simulation process.

    xii.   NATP cannot waive any skill on the CDPH 276A for pursuant to Title 22, §71835

    xiii.   NATP maintains attendance sign-in/sign out sheet for every day of clinical, which minimally includes: date and time of clinical, printed/typed name and signature of instructor, printed/typed name of student, and signature of student

    xiv.   Student attendance sheets will be used by NATP to verify each student completed 100 hours of clinical training

D. Course Completion

    i.   Course completion and verification processes must be established

    ii.   RN Program Director must verify all hours, modules and components being successfully completed by each student prior to signing CDPH283B

        (1) This is done through a review of the CDPH276A, CDPH276C, student attendance and sign-in sheets (including make-up sessions)

    iii.   The signing of the CDPH 283B may occur only after the student meets state and federal NATP requirements and is eligible to take the CAN competency exam

7. Attendance

    A.   Attendance and make-up policy must be established.

    B.   Rule for number of absences per student must be established

    C.   Student absenteeism and makeup

        i.   Makeup is "hour for hour", for same Modules, components and content as missed and must following the approved curriculum and lesson plans.

        ii.   Instructor must be present and available for questions during all training, including makeup.

    D.   Attendance records to document both classroom and clinical training hours must be kept

        i.   Sign in/sign out (Attendance records shall include the date and time of instruction, the name and signature of the student, and the name and signature of the instructor.)

8. Program and Instructor Monitoring

    A.   Program Monitoring criteria, processes and timeframe must be established and include specific details of how the monitoring will be completed

    B.   The monitor should verify that the approved NATP schedule and the approved lesson plans are being followed

    C.   The monitoring should verify documentation is complete, initiated by the proper individual, handwritten and does not contain blanket signatures

    D.   Each student is to complete all required hours, modules, components, skills prior to the 283B forms being submitted to the RN PD for signature

E. Monitoring policy must include the frequency of monitoring which should occur at least once for the clinical and once for theory for each class

F. The monitoring should be listed in the job description of the RN PD who monitors the NATP operation and the Administrator who monitors the RN PD to verify compliance monitoring is taking place per policy prior to RN PN signing CDPH 283B

G. Evaluation tools used for monitoring should be included in the "Forms" section of the policy and procedure manual

9. **RN Program Director (RNPD) Oversight of Multiple NATP Locations or Outside Employment**
   A. Address if NATP will allow RN Program Director to oversee multiples locations. If so, this additional oversight must be in the RN PD job description.
   B. Define the maximum number of NATP locations RNPD can oversee.
   C. Address if NATP will allow RNPD to have employment outside of the NATP.
   D. If allowed P&P must be included and specific.
   E. Any policy allowing "a" or "b" or "c" must include the requirement for Department's approval and the process that must be submitted and approved (prior to outside employment).
      i) RN PD must submit a letter to the Department listing names of current and proposed employers, job titles, and hours of employment per location along with a statement describing how all job duties will be met

10. **Record Maintenance and Forman Retention**
    A. Recordkeeping and form retention policy must list and provide detailed information regarding all forms and documents to be used, maintained, and retained by the NATP for a minimum of four years
    B. List all forms that are kept/maintained related to the program, including the when, where, who and how record keeping is accomplish with the Training Program.
       i) Any form listed in the student handbook or P&P, related to student/instructor evaluation, health exam, absenteeism, or student attendance must be provided as part of the P&P review. Information in documents must be current.
    C. Timeframe for keeping records and location where stored (locked).
    D. Address how security is maintained for documents that are removed from the designated storage location, such as student skills checklist, CDPH 276A and CDPH 267C forms during training.
    E. Student theory/clinical records completed and verified by RNPD prior to signing CDPH 283B.

11. **Competency Evaluation Testing**
    A. The NATP may only refer students to CDPH approved testing vendors (American Red Cross and National Nurse Aide Assessment Program) for competency evaluation exam.
    B. Students may only test with Department approved competency evaluation testing vendors.
    C. NATP process must include the process scheduling of testing
    D. Procedural steps for the content, sources and methods of proving competency evaluation testing information to students must be included.