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POLICY AND PROCEDURE REVIEW FORM- Nurse Assistant Training Program

Name of School:

Reviewer/Date:

Instructions: Policies must address the administration and management of the NATP. A student handbook is not a policy manual. The school's policies should include the purpose, scope (who is the policy applicable to), persons responsible for the policy, and the procedural specific steps (who, what, when, where, how). The Department must be able to clearly understand all elements of the policy and make a determination of its content. The school's policy manual must be presented in a consolidated, organized fashion. This would include a "Table of Contents" page, with each policy on separate pages. All pages would be numbered and dated, and have a heading which identifies the name of the school. Any form that the school uses would be identified in a "Form Section", which would be noted on the content page, and labeled at the end of the manual. If the school must make revisions to any pages of the policy manual, the school would submit the "revised" policy manual in its entirety to the Department for review. Also, on policy resubmissions, a cover page should be presented with the policy manual, explaining which pages have been revised.

NATPs P/Ps must minimally include:

		Met	Not Met/Comments:
			Please revise to include only policies and procedures listed to the left. 1 – 13.
1.	Policies are specific and are reviewed annually. Policy explains who is responsible for the review and the procedures for updates, including the audit form that is used when policy is updated and/or reviewed.		
2.	Job Descriptions detailing qualifications, duties, responsibilities and limitations for the licensed RN Prog. Director & Instructor: a. RN Program Director b. Instructor c. Administrator/Owner-Job description of the Administrator/Owner, related to oversight of the RN Program Director and any other aspects contained in the P/P or student handbook. d. Job description of others employed at the NATP (as noted in school's handbook/P&P/ or other documents) that have duties/ responsibilities related to the NATP process.		

3.	If RN Program Director oversees multiple schools; the <u>job description</u> must detail how oversight is provided for more than one school.	
4.	If school has RN Program Director that serves multiple locations, then Dept. will review/approve on case by case basis. RN Program Director will provide <u>justification</u> of how duties are done in writing, as well as inform the Department of all current employers, titles and hours of work/per week.	
5.	Organizational chart showing the person in charge of the program, the lines of authority, responsibility, communication, staff assignments and schedules.	
6.	The method of monitoring instructor by the individual responsible for the training program. (what, when, where, who, how). This information should be included in the duty statement for: Instructor, RN Program Director, Administrator or Owner (or others if noted in the school's P/P). Minimum -instructor evaluation once during class/once during clinical.	
7.	<p>a) Ratio of students (clinical setting) not to exceed 15 students to 1 instructor.</p> <p>b) Clinical instructor will demonstrate skills in the clinical setting and have students perform a return demonstration of all skills noted on the CDPH276A (Clinical Skills Checklist) in the clinical setting. All skills will be evaluated and documented on the date that the skill was performed.</p>	
8.	<p>How student absenteeism and makeup class will be handled. All makeup must be hour for hour with the instructor present. Policy must be specific, not vague. This process must be included in the job description of the person responsible for implementing the "make-up" assignments (theory and clinical).</p> <p><u>Makeup-time must be "well defined", limited number of days. Theory make-up must occur prior to clinical. The training schedule must show the "make-up" time within the specific training schedule.</u></p>	

9.	<p>a. All students will submit a CDPH 283B application and Live Scan fingerprinting upon enrollment.</p> <p>b. The Training Program shall ensure that the application CDPH283B to CDPH (Registry-ATCS) and LiveScan are submitted upon enrollment.</p>	
10.	The training program shall not make any false or misleading claims or advertisement regarding training provided.	
11.	School will follow the Department approved Training Schedule (cdph276B).	
12.	<p>Health exam and screening requirements:</p> <ul style="list-style-type: none"> a. Medical History b. Physical Examination, within 60 days of start of clinical, including TB and/or chest x-ray within 60 days, prior to attending clinical. c. Report signed by the MD, or Nurse Practitioner "that the student does not have a health condition that creates a hazard to self or others" 	
13.	<p>List all forms that are kept/maintained related to the program, including the when, where, who and how Record Keeping is accomplished within the Training Program.</p> <ul style="list-style-type: none"> a. Person responsible for completing daily attendance theory/clinical sign-in sheets. b. Person responsible for completing student records (theory/clinical). c. Timeframe for keeping records. d. Location where stored (locked) e. Completion of student records (timely) during the course and at the completion (who, when, how). f. Student theory/clinical records are complete prior to RN Program Director signs cdph 283B. g. Process of forms submitted upon enrollment. (cdph283Bs, copy of LiveScan BCIA8016, and coversheet for student roster (cdph283I). Person resp. for submission. 	

	<p>List the requirements and criteria for the following.</p> <ol style="list-style-type: none"> 1. Student receipt of Certificate of satisfactory Completion requirements. 2. Attendance and participation in graduation ceremony 		<p>Please develop policy and submit</p>
Other or Forms:	<p>Any form that is listed in the student handbook or P&P, related to student/instructor evaluation, health exam, sign-in sheets (etc.) must be provided as part of the P&P review. Information in documents must be current.</p>		



Nurse Assistant Training Program Policies & Procedures

Updated: *DATE*

The provisions of this catalog are not to be regarded as an irrevocable contract between the student and *SCHOOL*. A judicious attempt has been made to provide accurate and up-to-date information. *SCHOOL* reserves all rights to make changes as needed or desired in curriculum, course offerings, fees, requirements for completion, certification, graduation, and any other regulations. *SCHOOL* also reserves the right to establish effective dates of these changes.

Policies & Procedures Table of Contents

Annual Review Policy.	1
Annual Review Form.	2
Job Descriptions.	3
Administrator.	4
RN Program Director.	5
NA Instructor.	7
Organizational Chart.	9
Method of Monitoring Instructors.	10
Ratio of Students to Instructors.	12
Clinical Skills Instruction and Documentation.	13
Student Absenteeism and Makeup Classes.	15
CDPH283B and LiveScan.	18
Disqualifying Penal Code Sections.	19
California Law Governing CNA Criminal Background Checks.	21
CDPH283I Transmittal for Criminal Background Clearance.	23
False or Misleading Statements or Advertising.	24
Compliance with Published Class Schedules.	25
Health Exam and Screening Requirements.	26
CDPH 283B Form.	28
Management of Student Records.	30
Grievance, Complaint, Issue Review Process.	32

Policy Title: Annual Review of Policies & Procedures		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71828(a)	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5, Chapter 3, Article 1, 71730(c)	Approved by: Administrator	Revision Date: n/a

- Policy**
- The NATP will establish and maintain necessary policies and procedures to ensure that our operations remain in compliance with all requisite laws, regulations and policies under which we are regulated. These will be assembled into a **Policies & Procedures Manual (P&P)**, which will be shared with all staff.
 - The NATP will maintain ongoing review of its P&P in order to conform to changes in law, regulation, new interpretations of policies and best practices.
 - The NATP will, at a minimum, conduct annual reviews of its P&P.
 - The NATP reserves the right to make changes to its P&Ps at its discretion, without advance notice to students or regulatory agencies.

Purpose The P&P will provide guidelines under which the **Nursing Assistant Training Programs (NATP)** will operate in order to ensure full compliance with governing laws, regulations and policies.

Scope This policy applies to every employee who is involved in the NATP.

- Responsibilities**
- Administrator**
- Maintain master copy of Policies & Procedures Manual (P&P).
 - Approve all additions and/or changes to P&P.
 - Conduct annual review of P&P in December, and initiate revisions if needed. Update Annual Review Form once review is completed.
- RN Program Directors (PD) and NA Instructors**
- Comply with the provisions of the P&P
 - Report to the Administrator if they identify any changes, modifications or additions to the P&P that may be needed.

- Procedure**
- Any employee may contact the Administrator to identify changes, modifications or additions to the P&P.
 - At a minimum, the Administrator will conduct an annual review of the P&P, to be conducted in December. A memorandum for record with the date of the latest review will be included in the P&P.



SCHOOL will review the Nursing Assistant Training Program Policy and Procedures Manual, and will revise as necessary. The Administrator will sign their name, job title and date below after each annual review has been completed. Annual reviews will be conducted in December of each year.

Policy Title: Job Descriptions		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71828(b)(1)	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5, Chapter 3, Article 1, 71730(b)	Approved by: Administrator	Revision Date: n/a

- Policy: The NATP will maintain job descriptions for all positions, detailing qualifications, duties and responsibilities for each administrative and faculty position.
- Purpose: To ensure that employees have a clear understanding of their position.
- Scope: This policy applies to every employee who is involved in the NATP.
- Responsibilities: **Administrator**
- Develop job descriptions for all administrative and faculty positions.
 - Ensure that job descriptions are incorporated into the P&P.
- Procedure: The NATP has developed job descriptions for the following positions, which follow:
- Administrator
 - RN Program Director
 - NATP Coordinator

JOB DESCRIPTION
Administrator

General Purpose:

To oversee the successful operations for all functions consistent with the school Policies & Procedures and applicable regulations.

Duties and Responsibilities:

1. Serves as the School Administrator.
2. Serves as the direct supervisor for the RN Program Director and staff assigned to, or operating in support of the Nurse Assistant Training Program (NATP).
3. Monitors all advertisements and public statements to ensure that the NATP makes no false or misleading statements, and does not represent any program as leading to certification unless it is CDPH approved.
4. Analyzes results on a regular basis making appropriate changes to overcome issues.
5. Manages partnerships with government, accrediting agencies, business and industry in order to ensure compliance with regulations and to promote the school, its programs, and outcomes.
6. Focuses on continuous process improvement through student feedback.
7. Develops a school communication system to provide staff and faculty effective ways to receive necessary feedback to each other.
8. Conducts annual performance review of the RN Program Director.
9. Maintains the master copy of the NATP Policies & Procedures Manual and oversees all revisions.
10. Conducts annual review of the P&P Manual in December of each year, ensures changes are published and distributed and signs the Annual Review Form.
11. Responsible for documenting all Special Accommodation issues in coordination with CDPH.

JOB DESCRIPTION
RN Program Director (PD)

General Purpose:

RN Program Directors are senior managers and supervisors for the nursing assistant training program. This is a part-time position, responsible for providing oversight for Nursing Assistant training classes taught by the NA Instructor. RN Program Directors report to the Administrator.

Minimum Qualifications:

- Must hold an RN license in California that is active, current and in good standing.
- Must have a minimum 2 years of nursing experience, one (1) year in a long term/skilled nursing facility providing direct patient care in addition to one (1) year experience planning, implementing and evaluating educational programs in nursing.
- Must have valid California Director of Staff Development certification.
- Must meet the requirements of CCR Title 22, § 71829.
- Must have a valid California Driver's License, access to a reliable vehicle and current automobile insurance.

Duties and Responsibilities:

1. Oversee NA Instructors in accordance with the instructional plan to ensure that they understand state guidelines for teaching Nursing Assistant training programs.
2. Confirm that NA Instructors follow the curriculum for theory and clinical training.
3. Serve as an on-call resource for the NA Instructors.
4. Review current curriculum and recommend changes that may be needed to the Administrator.
5. If the NA Instructor requires relief or replacement, ensure that a qualified, approved substitute NA Instructor is assigned, or, if necessary, takes over the NA Instructor role.
6. Be available by appointment, to counsel students who may be having trouble in class.
7. Be available, by appointment, to respond to any student inquiries or complaints that may arise.
8. Investigate complaints involving NA students or NA Instructors and report findings to the Administrator.
9. Review and respond to missed Theory or Clinical hours, or requirements to repeat training with subsequent NA classes.
12. Prior to graduation receive Student Training Record files from the NA Instructor and review to ensure that every student has successfully met the training standard and that each form has been completed correctly, and completely by the NA Instructor.
13. Sign each graduating student's state application (CDPH283B form), confirming said students are eligible to take the state competency exam.
14. Attend orientation and graduation events. Assist the NA Instructor in the conduct of the Graduation Ceremony, and in dealing with students who have not successfully completed the NATP in time for the Graduation Ceremony.
15. Complete and submit the RN Program Director Checklist to the Administrator following completion of each class.
16. Coordinate with the Administrator and the NA Instructor in scheduling NA training

classes and setting teaching schedules.

17. For performance reviews, serve as first line reviewer of NA Instructors.
18. During unscheduled class visits conduct spot checks of Student Training Record files.
20. Review all requests for Special Accommodation by students, and send recommendation to the Administrator.
21. Comply with the provisions of the NATP Policies & Procedures Manual.

RN Program Director Evaluation

RN Program Directors will receive annual evaluations. The Administrator will write the evaluation for the RN Program Director. The due date for annual evaluations will be July 31st every calendar year.

Physical Demands

- Occasional bending, squatting, reaching and lifting.
- Fine manipulation of repetitive grasping, pinning and pulling.
- Specific vision abilities required by job include distance and peripheral vision.

JOB DESCRIPTION
Nursing Assistant (NA) Instructor

General Purpose:

NA Instructors serve as the primary instructors for nurse assistant training programs for both theory and clinical training. They operate under the supervision of RN Program Director.

Minimum Qualifications:

- Must hold a California RN or LVN License that is active, current and in good standing.
- Must have a minimum 2 years of nursing experience, one (1) year in a long term skilled nursing facility providing direct patient in addition to one (1) year experience planning, implementing and evaluating educational programs in nursing
- Must have valid California Director of Staff Development certification.
- Must meet the requirements of CCR Title 22, § 71829
- Must have a valid California Driver's License, access to a reliable vehicle and current automobile insurance.

Duties and Responsibilities:

1. Present lectures and conduct discussions to increase students' knowledge and competence, using visual aids such as graphs, charts, videotapes and slides.
2. During clinical instruction, demonstrate skills in the clinical setting and have students perform a return demonstration of skills noted on CDPH276A (Clinical Skills Checklist) in the clinical setting. All skills will be evaluated and documented on the date that the skill was performed.
3. Understand the training curriculum, plan course content and methods of instruction.
4. Ensure that the daily attendance is completed in both theory and clinical training.
5. Maintain ongoing dialog with students to ensure that they are aware of Theory or Clinical hours that are required to make up.
6. Inform the RN when students miss required Theory or Clinical hours.
7. Inform students of the options for making up missed Theory or Clinical hours.
8. Create academic and vocational curricula so that students can obtain variety of skills.
9. Observe and evaluate students' work to determine progress, provide feedback, and make suggestions for improvement.
10. Ensure that all student records are completed fully and accurately, and that student records are secured in a locked cabinet when they are not actively being used by the NA Instructor.
11. Review student records to ensure that Health Exam and Screening documentation is received and properly filed in student training records.
12. Participate in conferences, seminars, and training sessions to keep abreast of developments in the field' and integrate relevant information into training programs.
13. Confirm that Live Scan clearance has been submitted for students before allowing them to interact with SNF residents.
13. Report deviations from the schedule/curricula to the RN Program Director.
15. Ensure that Student Training Record files are kept secure when class is not in session.
16. Complete Student Training Record files completely and correctly, in accordance with

NATP and CDPH policies.

17. Work with students to identify Special Accommodation needs and issues.
18. Identify and counsel students who have not successfully completed the NATP in time for the Graduation Ceremony.
19. Counsel students who have not successfully completed the NATP in writing and explain their option to participate in the Graduation Ceremony.
20. Make arrangements with students who have not successfully completed the NATP to allow them to participate in the Graduation Ceremony.
21. Comply with the provisions of the NATP Policies & Procedures Manual.

Required Knowledge/Skills:

- **Education and Training** - Knowledge of the principles and methods for curriculum and training design, teaching and instruction for individuals and groups, and the measurement of training effects.
- **English Language** - Knowledge of the structure and content of the English language including the meaning and spelling of words, rules of composition and grammar.

Skills:

- **Speaking** - talking to others to convey information effectively Instructing teaching others how to do something
- **Active Listening** - giving full attention to what other people are saying, taking time to understand the points being made, asking questions if appropriate, and not interrupting at inappropriate time
- **Learning Strategies** - selecting and using training/instructional methods and procedures appropriate for the situation when learning/teaching new things.
- **Reading Comprehension** - understanding written sentences and paragraphs in work related documents.

Instructor Evaluation

NA Instructors will receive annual evaluations. The RN Program Director will write the evaluations and the Administrator will serve as the senior reviewer. The due date for annual evaluations will be July 1st of every calendar year. Factors that may be included in the evaluation include:

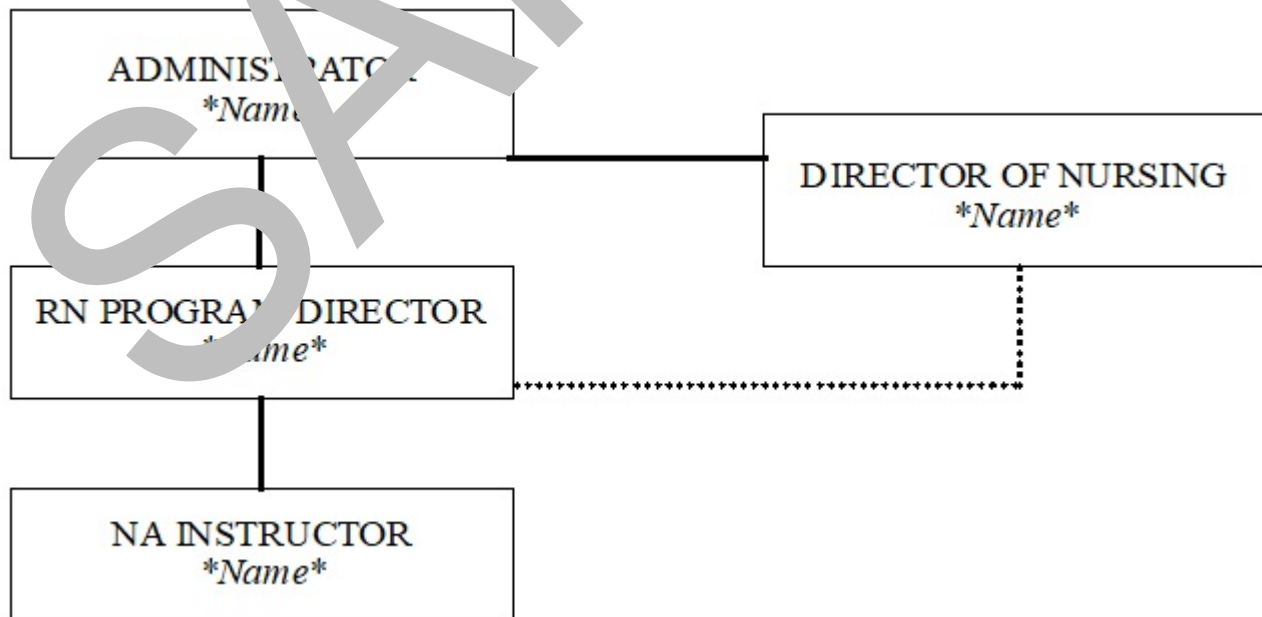
1. Instructor evaluations by the students at the conclusion of every class.
2. Percentage of NA Instructor's students passing the state examination for certification.
3. Notes from the Program Director's unannounced and announced visits to the NATP class.

Physical Demands

- Occasional bending, squatting, reaching and lifting.
- Fine manipulation of repetitive grasping, pushing and pulling.
- Specific vision abilities required by job include distance and peripheral vision.

Policy Title: Job Descriptions		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71828(b)(2)	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

- Policy: The NATP will operate utilizing the included Organization Chart.
- Purpose: The Organization Chart shows the person in charge of the program, the lines of authority, responsibility, communication and staff assignments.
- Scope: This policy applies to every employee who is involved in the NATP.
- Responsibilities: **Administrator**
- The Administrator is responsible for making executive decisions and setting corporate policy for the NATP.
- RN Program Director (PD)**
- The PD is responsible for quality control and oversight of the NATP, and supervises NA Instructors.
- NA Instructors**
- Responsible for theory and clinical training at NATPs and for ensuring compliance with the Policies & Procedures.
- Procedure: The Organizational Chart follows.



Policy Title: Method of Monitoring Instructors		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71828	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

Policy: The NATP will conduct ongoing monitoring and training of instructors.

Purpose: To ensure that instructors are effective, that they follow established policies & procedures, that they are kept updated on policy changes, and that program related issues are dealt with effectively.

Scope: This policy applies to every employee who is involved in the NATP.

Responsibilities: Administrator

- Serve as senior reviewer for the RN Program Director and NA Instructors.

RN Program Director (PL)

- Conduct required monitoring visits to NATP.
- Review student records.
- Serve as first line reviewer of NA instructors.
- Respond to issues relating to NATP as they arise.

NA Instructors

- Conduct operations and maintain records in compliance with the P&P.

Procedure:

Monitoring

The NATP will monitor NA Instructors using three methods, scheduled visits, unannounced visits, and visits prompted by issues that arise during the course of the NATP.

- The PD will conduct regular scheduled and unscheduled monitoring visits to theory and clinical training sessions.
- The PD will review all student records at the conclusion of each NA class.
- When issues are identified relating to the quality of training or compliance with P&P the PD will have primary responsibility for investigating.

Evaluation

- NA Instructors will receive annual evaluations. The PD will write the evaluation, and the Administrator will serve as the senior reviewer. The due date for annual evaluations will be July 31 of every calendar year.
- PDs will receive annual evaluation. The Administrator will write the evaluation for the PD. The due date for annual evaluations will be July 31 of every calendar year.

Policy Title: Ratio of Students to Instructors		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71835(m)	Prepared by: RN Program Director	Effective Date: **/**/****
	Approved by: Administrator	Revision Date: n/a

- Policy: The student ratio during clinical practice shall be no more than 15 students per instructor.
- Purpose: To ensure that NA training programs comply with state and federal regulations.
- Scope: This policy applies to every employee who is involved in the NATP.
- Responsibilities: **RN Program Director (PD)**
- During the registration process, monitor class enrollment to ensure that classes are restricted to 15 students or less.
- Procedure: The NATP will ensure that we have 15, or fewer students per NA class. This will happen during the enrollment period and will be confirmed at the time that classes start.

Policy Title: Clinical Skills Instruction and Documentation		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

- Policy:** NA Instructor will demonstrate skills in the clinical setting and have students perform a return demonstration of all skills listed on the CDPH276A (Clinical Skills Checklist) in the clinical setting. All skills will be evaluated and documented on the date the skill was performed.
- Purpose:** To provide accurate and complete records of students' progress completing the NATP.
- Scope:** This policy applies to every employee who is involved in the NATP.
- Responsibilities:**
- RN Program Directors (PD)**
 - Produce CDPH276A forms for each student prior to the start of new NATP classes and send to the NA Instructor.
 - Upon completion of NATP classes receive CDPH276A forms back from NA Instructor and place in student records.
 - Review CDPH276A forms to ensure that all skills have been successfully completed, and ensure that the NA Instructor has filled them out correctly.
 - NA Instructor**
 - Receive CDPH276A forms from the PD.
 - Record status for each skill demonstration on the form.
 - Ensure that all skills have been demonstrated prior to the completion of the class.
 - Maintain positive control of CDPH276A forms throughout the training process.
 - Review the CDPH276A with the PD prior to the graduation.
- Procedure:**
1. At the start of each new NA class the NATP will print CDPH276A forms for each student in the class. These will be assembled into binders and sent to the NA Instructor.
 2. The CDPH276A forms will be stored at the NA training site during the duration of the class.
 3. The NA Instructor will maintain positive control of the CDPH276A forms. This means that the NA Instructor will have all of the forms at the start of the class session, and will have all of the forms at the end of the class session.

SCHOOL

4. The NA Instructor will demonstrate all skills in the clinical setting and have students perform a return demonstration in the clinical setting.
5. Every skill will be demonstrated, and results will be recorded on the CDPH276A Skills Checklist Form.
 - A. Successful demonstration of skills will be indicated with an S for satisfactory. Unsuccessful demonstration will be indicated with a U for unsatisfactory.
 - B. If a student does not successfully demonstrate a skill successfully on the first attempt the NA Instructor will review the skill with them, and give them a second chance to demonstrate the skill.
 - C. The NA Instructor has discretion to mark a skill as unsuccessful or to continue to train a student if they fail to demonstrate a skill the second time. The student must be counseled on the decision and it must be documented on a Rapid Memo form.
6. All skills must be conducted in the skilled nursing facility clinical site.
7. Any skills that can not be demonstrated on a resident will need to be demonstrated through simulation.
 - A. The preferred method of simulation will be to demonstrate skills on a mannequin, on a fellow student, or using visual aids.
 - B. When necessary, skills may be demonstrated using verbal description.
 - C. All skills that are demonstrated using simulation will be marked "Simulation" on the CDPH276A form.
 - D. Return skills demonstrations must still be performed in the skilled nursing facility clinical site.
8. At the conclusion of the class the NA Instructor will ensure that the CDPH276A forms are complete, and will sign the forms. All skills demonstrations must be marked with an S for satisfactory. Prior to graduation the PD will review the CDPH276A forms.
1. After the completion of the class the CDPH276A forms will be added to the Student Enrollment Records, and retained as evidence of training.

Policy Title: Student Absenteeism and Make-up Classes		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71828	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

Policy: All NA students must complete a minimum of 160 hours of training (60 hours theory, 100 hours clinical) before they can be considered for graduation, or recommended for the state certification exam. This policy lays out mechanisms by which students may make up missed training time.

Purpose: To ensure that NA students complete all required training hours, and to provide mechanisms for students to make up any hours which they may have missed.

Scope: This policy applies to every employee who is involved in the NATP.

Responsibilities:

RN Program Directors (RDs)

- Review all issues pertaining to missed Theory or Clinical hours, or requirements to repeat training with subsequent NA classes.

NA Instructors

- Maintain ongoing dialog with students to ensure that they are aware of Theory or Clinical hours that they are required to make up.
- Inform the RD whenever students miss required Theory or Clinical hours.
- Inform students of their options for making up missed Theory or Clinical hours.

Procedure: A student must successfully complete a minimum of 160 hours of training (60 hours theory, 100 hours clinical) before they can be considered for graduation, or recommended for the state certification exam. Failure to complete the full 160 hours is basis for not issuing a CDPH283B form, and not permitting the student to take the state certification exam.

Students are required to contact the NA Instructor if the student will be late to class or miss class. Students are also required to arrange make-up time with the NA Instructor. All make-up time must be hour-for-hour and at least match the time missed due to being absent from part of a class or the entire class. The NA Instructor MUST be present for the full amount of make-up time.

Missed time should be made up as soon as possible within the existing class term and is subject to the availability of a NA Instructor. Students unable to complete make-up time in a timely fashion will have the option of completing the program at a later date.

The NATP offers two options for NA students to make up training hours that they miss.

Group Make-up Time on Scheduled Make-up Days

CMA will add designated make-up days to the class schedule and to the CDPH276B. Students may participate in these make-up days to make up missed theory or clinical hours.

1. The NATP allocates NA Instructors one 5 hour “theory make-up day” during the NATP class. This will appear on the school calendar before the first day of clinical training. For students who are current with their Theory hours attendance during this day is optional; attendance is mandatory for students who need to make up Theory hours prior to beginning Clinical.
2. The NATP allocates NA Instructors one 8 hour “clinical make-up day” during the final week of the NATP class. This will appear on the school calendar before the last day of Clinical training. For students who are current with their Clinical hours attendance during this day is optional; attendance is mandatory for students who need to make up Clinical hours prior to graduation.

Additional make up days may be added with the approval of the RN Program Director.

Repeating or Making Up Theory or Clinical Hours with Subsequent NA Classes

Students may be required to repeat, or make up Theory or Clinical hours with a subsequent NA class. This can be required if:

1. The student cannot complete their required training hours prior to their class graduation date, or
2. The student is deemed deficient in their skills, but is deemed potentially capable of reaching competence if they repeat the training.

Students who are required to repeat theory or clinical hours with subsequent NA classes are not considered to be successful graduates until they successfully complete the required training hours and completely demonstrate all required skills.

1. Prior to the NA class graduation, the NA Instructor is required to issue a written counseling to the student, detailing the requirement to participate in the subsequent NA program and explaining what conditions they must meet in order to be considered a successful graduate of the NATP.
2. The student will have the option to participate in their class graduation ceremony, but they will not receive a Certificate of Completion, or signed CDPH283B form.
3. Students will be considered to have successfully graduated, and will be issued their Certificate of Completion and CDPH283B form, when they have successfully completed the hours and/or demonstrated the skills identified as deficient in their original written counseling.
4. Students who refuse to participate in the subsequent NA class will immediately be expelled from the program.

Policy Title: CDPH283B and Criminal Background Screening of Students		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5, 1338.5.(a)(2)(B)	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

Policy: All potential students must submit a CDPH283 form and provide documentation of a Live Scan fingerprinting/criminal background check in order to enroll in the NATP.

Purpose: To screen student enrolling into the Nursing Assistant Program to meet State and Federal regulations and requirements.

Scope: This policy applies to every employee who is involved in the NATP.

Responsibilities: **RN Program Director**

- Inform potential students of the Live Scan requirement, transmit application form, and discuss potential disqualifying offenses.
- Collect copies of completed CDPH283B forms and Live Scan documentation from students.
- Compile Live Scan documentation and provide to SNF training site.

NA Instructor

- Confirm Live Scan clearance for students before allowing them to interact with SNF students.

Procedure:

1. Prospective students will be provided with, and are required to acknowledge receipt of information on where to find CDPH required documentation specific to convictions on the CDPH website and with CDPH contact telephone number.
2. Every student enrolled into the training program will be required to submit to the school the following upon enrollment.
 - a) Completed Live Scan application
 - b) Completed Nurse Assistant initial application, CDPH283B form.
3. The school will send all enrolled students 283B applications and live scan forms to the CDPH ATCS after the first day of class.

Disqualifying Penal Code Sections

If they have been convicted of any of the penal codes listed, CNA/HHA applicants will be automatically denied certification.

Certification of applicants with convictions on this list MAY be reconsidered by the Department only if misdemeanor actions have been dismissed by a court of law or a Certificate of Rehabilitation has been obtained for felony convictions. Any other convictions, other than minor traffic violations, must also be reviewed

Section

187 Murder

192(a) Manslaughter, Voluntary

203 Mayhem

205 Aggravated Mayhem

206 Torture

207 Kidnapping

209 Kidnapping for ransom, reward, or extortion or robbery

210 Extortion by posing as kidnapper

210.5 False imprisonment

211 Robbery (Includes degrees in 212.5 (a) and (b))

220 Assault with intent to commit mayhem, rape, sodomy, oral copulation

222 Administering stupefying drugs to assist in commission of a felony

243.4 Sexual battery (Includes degrees (a) - (d))

245 Assault with deadly weapon, alternative

261 Rape (Includes degrees (a)-(c))

262 Rape of spouse (Includes degrees (a)-(c))

264.1 Rape or penetration of genital or anal openings by foreign object

265 Abduction for marriage or filiation

266 Inveiglement or enticement of minor under 18

266a Taking person without will or by misrepresentation for prostitution

266b Taking person by force

266c Sexual act with force

266d Receiving money to procure person in cohabitation

266e Placing a person for prostitution against will

266f Selling a person

266g Prostitution of wife by force

266h Pimping

266i Pandering

266j Luring child under 16 for lewd act

266k Felony enhancement for pimping/pandering

267 Abduction of person under 18 for purposes of prostitution 273a Willful harm or injury to a child; (Includes degrees (a)-(c))

273d Corporal punishment/injury to a child (Includes degrees (a)-(c))

273.5 Willful infliction of corporal injury (Includes (a)-(h)) 285 Incest

Section

286(c) Sodomy with person under 14 years against will

286 (d) Voluntarily acting in concert with or aiding and abetting in act of sodomy against will

286(f) Sodomy with unconscious victim

286(g) Sodomy with victim with mental disorder or developmental or physical disability

288 Lewd or lascivious acts with child under age of 14

288(a) Oral copulation

288(c) Oral copulation with person under 14 years against will

288(d) Voluntarily acting in concert with or aiding and abetting

288(f) Oral copulation with unconscious victim

288(g) Oral copulation with victim with mental disorder or developmental or physical disability

288.5 Continuous sexual abuse of a child (Includes degree (a))

289 Penetration of genital or anal openings by foreign object (Includes degrees (a)-(d))

289.5 Rape and sodomy (Includes degrees (a)-(d))

368 Elder or dependent adult abuse; theft or embezzlement of property (Includes (b)-(f))

451 Arson (Includes degrees (a)-(e))

459 Burglary (Includes degrees in 460 (a) and (b))

470 Forgery (Includes (a)-(e))

475 Possession or receipt of forged coins, notes, postage stamps, lottery tickets or shares

(Includes degrees (a) - (c))

484 Theft

484b Intent to commit theft of a firearm

484d-j Theft of access card, recovery or access card, unlawful use of access card

487 Grand theft (Includes degrees (a)-(d))

488 Petty theft

496 Receiving stolen property (Includes (a)-(c))

503 Embezzlement

518 Extortion

666 Repeat convictions for petty theft, grand theft, burglary, carjacking, robbery and receipt of

stolen property

Amended (11/09)

California Law Governing CNA Criminal Background Checks

Senate Bill 1384, which was signed by the Governor on September 29, 2014,

SECTION 1. Section 1337.9 of the Health and Safety Code is amended to read:

1337.9.

(b) The state department may deny an application for, initiate an action to suspend or revoke a certificate for, or deny a training and examination application for, a nurse assistant for any of the following:

- (1) Unprofessional conduct, including, but not limited to, incompetence, gross negligence, unless due to circumstances beyond the nurse assistant's control, physical, mental, or verbal abuse of patients, or misappropriation of property of patients or others.
- (2) Conviction of a crime substantially related to the qualifications, functions, or duties of a certified nurse assistant if the state department determines that the applicant or certificate holder has not adequately demonstrated that he or she has been rehabilitated and will present a threat to the health, safety, or welfare of patients.
- (3) Conviction for, or use of, any controlled substance as defined in Division 10 (commencing with Section 11000), or any dangerous drug, as defined in Section 4022 of the Business and Professions Code, or alcoholic beverages, to an extent or in a manner dangerous or injurious to the certified nurse assistant, any other person, or the public, to the extent that this use would impair the ability to conduct with safety to the public, the practice authorized by a certificate.
- (4) Procuring a certified nurse assistant certificate by fraud or misrepresentation or mistake.
- (5) Making or giving any false statement or information in connection with the application for issuance of a nurse assistant certificate or training and examination application.
- (6) Impersonating any applicant, or acting as a proxy for an applicant, in any examination required under this article for the issuance of a certificate.
- (7) Impersonating another certified nurse assistant, a licensed vocational nurse, or a registered nurse, or permitting or allowing another person to use a certificate for the purpose of providing nursing services.
- (8) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violating of, or conspiring to violate any provision or term of this article.

SB1384, cont'd

(c) In determining whether or not to deny the application for licensure or renewal pursuant to paragraph (2) of subdivision (b), the department shall take into consideration the following factors as evidence of good character and rehabilitation:

- (1) The nature and seriousness of the conduct or crime under consideration and its relationship to their employment duties and responsibilities.
- (2) Activities since conviction, including employment or participation in therapy or education, that would indicate changed behavior.
- (3) The period of time that has elapsed since the commission of the conduct or offense referred to in paragraph (1) or (2) and the number of offenses.
- (4) The extent to which the person has complied with any terms of parole, probation, restitution, or any other sanction lawfully imposed against the person.
- (5) Any rehabilitation evidence, including character references, submitted by the person.
- (6) Employment history and current employer recommendations.
- (7) Circumstances surrounding the commission of the offense that would demonstrate the unlikelihood of repetition.
- (8) An order from a superior court pursuant to Section 203.4, 203.4a, or 203.41 of the Penal Code.
- (9) The granting by the Governor of a full and unconditional pardon.
- (10) A certificate of rehabilitation from a superior court.

State of California- Health and Human Services Agency

California Department of Public Health (CDPH)
Licensing and Certification Program (L&C)
Aide and Technician Certification Section (ATCS)
MS 3301, P.O. Box 997416
Sacramento, CA 95899-7416
PHONE: (916) 327-2445 FAX: (916) 552-8785

(This form is to be used for CNA/HHA students only)

☐ CNA Program ☐ HHA Program

Also attached for each applicant is the 2nd copy of the completed Request for Live Scan Service (BCIA 8016) form signed by the fingerprint technician

[illegible]

Name and address of facility (school)
We plan to begin the class on (date)

Date:

Contact Person: _____ Telephone: _____

US-approved facility/school ID number(s): CNA _____ HHA S9 _____

INFORMATION COLLECTION AND ACCESS-PRIVACY STATEMENT

Pursuant to Section 866(a)(13) of Title 42 of the United States Code and California Family Code, Section 17520, subdivision (d), the Department of Public Health (CDPH), is required to collect social security numbers from all applicants for nursing assistant certificates, home health aide certificates, hemodialysis technician certificates or nursing home administrator licenses. Disclosure of your social security number is mandatory for purposes of establishing, modifying, or enforcing child support orders upon request by the Health Integrity and Protection Data Bank as required by 45, CFR §61.1 *et seq.* Failure to provide your social security number will result in denial of your application. Your social security number will be used by CDPH for internal identification, and may be used to provide information on your application to a certification with another state's certification authority, for examination identification, for identification purposes in national disciplinary databases or as the basis for disciplinary action against you.

Date Submitted: _____

CDPH 283I (04/14)

This form is available on our website at: www.cdph.ca.gov

ORIGINAL – Live Scan Operator, SECOND COPY – Applicant, THIRD COPY (if needed) – Requesting Agency

Policy Title: False or Misleading Statements or Advertisements		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71828	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

Policy: The NATP will not make or disseminate false or misleading statements or advertisements regarding the provided training and the school must make no claims that the program will lead to a student receiving certification unless the NATP is state approved.

Purpose: The Training Program General Policies & Procedures are intended to address common questions regarding NATP operations.

Scope: This policy applies to every employee who is involved in the NATP.

Responsibilities:

- Administrator**
 - Responsible for monitoring and ensuring compliance with the NATP Policies & Procedures.
- RN Program Directors (D)**
 - Responsible for representing the NATP in public activities and in communication with students, potential students and the public.
- NA Instructors**
 - Responsible for representing the NATP in public activities and in communication with students, potential students and the public.

Procedure: The school will not make or disseminate false or misleading statements or advertisements regarding the provided training and the school must make no claims that the program will lead to a student receiving certification unless the NATP is state approved.

Policy Title: Compliance with Published Class Schedules		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71828	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

Policy: NA training programs will be conducted using schedules and curricula that have been approved by CDPH. NA Instructors will make every effort to comply with the published schedules. Any deviation from the published schedule/curricula will be reported to CDPH.

Purpose: It is important for NA training programs to be in accordance with published schedules.

Scope: This policy applies to every employee who is involved in the NATP.

Responsibilities:

Administrator

- Publish the training schedule for each NA class prior to the start of the class. Ensure that schedules conform to CDPH approved formats, coordinate schedules with NA Instructors and SNF clinical sites.
- Inform CDPH of any deviation from the published schedule/curricula.

RN Program Director (PD)

- Monitor the progress of NA classes. Inform the NA Instructor if they notice any reported deviation from the schedule.

NA Instructors

- Track daily progress of the NA class.
- Report deviations from the schedule/curricula to the PD.

Procedure:

1. The Administrator will coordinate class schedules with the PD, NA Instructor and Director of Nursing prior to the start of each NA class.
2. The Administrator will ensure that the class schedule/curriculum conforms with the model approved by CDPH. Minor variations are permitted, but must be reported to CDPH in advance.
3. NA Instructors are responsible for tracking the daily progress of the NA class against the class schedule/curriculum. Any variations, whether they are changes to class days/timing, class hour, or completion of training modules, must be reported..
4. The Administrator will report all variations in the schedule to CDPH.

Policy Title: Health Exam and Screening Requirements		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71828	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

Policy: The NATP requires that all applicants for the NA program complete the following health exam and screening requirements:

1. Provide a medical history.
2. Provide record of a physical examination, conducted within 60 days of the start of clinical training, including TB and/or chest x-ray.
3. Provide a report, signed by an MD or Nurse Practitioner, certifying "that the student does not have a health condition that creates a hazard to themselves or others".

Purpose: To ensure the health and safety of students and facility residents.

Scope: This policy applies to every employee who is involved in the NATP.

Responsibilities: Administrator

- The Administrator is responsible for monitoring and ensuring compliance with the NATP Policies & Procedures.
- Serve as primary liaison to CDPH
- Manage enrollment process and student records
- Ensure that Health Exam and Screening requirements are met.

RN Program Directors (PD)

- The PD is responsible for supervising the NA Instructors assigned to the NA training program.

NA Instructors

- Review student records to ensure that Health Exam and Screening documentation is received and properly filed in student training records.

Procedure 1. Student Health Exam and Screening Requirements:

- A. Prior to the start of clinical training, all NATP students must have completed, and submitted documentation of the following requirements.

- B. Documentation of a health examination, signed by a physician, physician's assistant or nurse practitioner, conducted within 60 days of the start of clinical training, indicating that the student does not have any health condition that would create a hazard to him/her self, fellow employees or patients.

This must include a medical history.

- C. Documentation of a tuberculosis test, or a chest x-ray that indicates that the student is not positive for tuberculosis. This must be completed within 60 days of the start of clinical training.
2. The RN Program Director is responsible for ensuring that students complete and submit their medical clearance documentation, and that these documents are forwarded to the NA Instructor.
 3. PD and NA Instructor will provide the Administrator with record of student enrolled in the NATP which will include record of their physical exam, TB clearance and a copy of the transmittal of CDPH283B form and Live Scan to CDPH.
 4. The NA Instructor is responsible for reviewing student training records to ensure that all medical clearance documents are properly filed and present for inspection, and that student records are secured in a locked cabinet when they are not actively being used by the NA Instructor.

Policy Title: CDPH 283B Form		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

Policy: NATP Staff will exercise special caution in assisting students to fill out the CDPH 283B form, and in handling the forms once they are completed by students.

Purpose: The CDPH 283B form is the student's record of having successfully completed the NA Certification Course. They must present this form in order to take the state certification exam. It must be completed perfectly.

Scope: This policy applies to every employee who is involved in the NATP.

Responsibilities: Administrator

- Send CDPH 283B form to the RN and NA Instructor prior to the mandatory orientation session for each NA class.
- Receive one (1) copy of the CDPH283B form from the NA Instructor following the mandatory orientation.
- Forward a copy of the CDPH283B form and Live Scan confirmation form to CDPH no later than 7 days after the first day of class and prior to the start date of clinical training.

RN Program Director (RN)

At the mandatory orientation, work with the NA Instructor to inform students in how to fill out the CDPH 283B forms, and review to ensure they are filled out correctly.

- Prior to the graduation, after reviewing the training records, complete and sign the CDPH 283B forms for students who have successfully met training standards.

NA Instructors

Have students complete 3 copies of the CDPH 283B form at the mandatory orientation.

- Retain 2 copies in the student record at the NA training site, return 1 copy to the Administrator.
- Prior to the graduation, provide the 2 copies to the PD. 1 signed copy will be provided to the student. The remaining copy will be kept in the Student Training Record file.

SCHOOL

Procedure:

1. Prior to the mandatory orientation the Administrator will send the NA Instructor enough copies of the CDPH 283B form so that each student can complete 3 copies.
2. At the mandatory orientation the PD and NA Instructor will have students fill out 4 copies of the CDPH 283B form.
 - A. The CDPH283B form is considered a “Zero Defects” document when it is reviewed at the State Certification Examination site. This means it must be filled out perfectly by the students and by CMA staff.
 - 1) The Administrator will ensure that information pertaining to the school, the NATP class location and the program dates are typed on the form, and that they are correct prior to sending them to the NA Instructor for the mandatory orientation session.
 - 2) The NA Instructor will double check all data typed on the forms by the Administrator.
 - 3) The NA Instructor will take the students through filling out their information on the forms, stressing the importance of data being legible, and that information on the CDPH283B form exactly matches information on their ID that they plan to use as their testing site.
 - 4) The NA Instructor and PD will review each copy of the students’ CDPH 283B forms to ensure that they are legible and consistent.
 - B. 2 copies will be stored with the students’ training records at the NA training site.
 - C. 1 copy will be returned to the Administrator. These will be kept as “backup” copies in the event of unanticipated contingencies.
 - D. The Administrator will send CDPH copies of the CDPH283B, along with the Live Scan confirmation form, for each student in the NATP class no later than 7 days after the first day of class and prior to the first day of clinical training.
3. Prior to the graduation the PD will complete and sign the 2 copies of the CDPH 283B form at the NA training site. 1 copy will be given to the successful graduate, the remaining copy will be placed in the Student Training Record file.
4. The Administrator will be responsible for sending completed CDPH 283B forms to CDPH.

Policy Title: Management of Student Records		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5 71828	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

Policy: The NATP will maintain accurate, complete records of all students in compliance with CDPH requirements.

Purpose: To ensure accurate and complete record of students' enrollment documentation, progress in completing the NATP, and to provide a permanent record of their educational accomplishments while enrolled at the NATP.

Scope: This policy applies to every employee who is involved in the NATP.

Responsibilities: Administrator

- Monitor all staff to ensure compliance with school policy.
- Monitor and review student record keeping.
- Ensure that student records for completed classes are digitally scanned and securely stored.
- Manage destruction of paper records 5 years after completion of training.

RN Program Director (PR)

- During unscheduled class visits conduct spot checks of Student Training Record files.

Prior to graduation receive Student Training Record files from the NA Instructor and review to ensure that every student has successfully met the training standard and that each form has been completed correctly, and completely by the NA Instructor.

NA Instructors

Ensure that Student Training Record files are kept secure when class is not in session.

- Complete Student Training Record files completely and correctly, in accordance with Policies & Procedures and CDPH policies.

Procedure:

1. Daily Attendance

Daily attendance records for both Theory and Clinical training will be completed and maintained by the NA Instructor.

2. Student Training Records, Theory/Clinical

- A. Student Training Records will be assembled by the NATP prior to the start of the program.
- B. The NA Instructor will review the Student Training files for completeness prior to the start of training, to include medical clearance forms.
- C. Upon the completion of training the Student Training records will be returned to the Administrator for storage.

3. Timeframe for Keeping Records

- A. The NATP will maintain all electronic student records and secure digital data storage in perpetuity.
- B. The NATP will maintain hard copies of student records for a minimum of five (5) years from the date that training programs are completed.

4. Location Where Records Will Be Stored

- A. During the entire training period of NA training programs student training records will be maintained at the training site.
- B. Following completion of the NATP all records will be transferred to the Administrator for long-term storage.

5. Time Completion of Student Records During the Course

NA Instructors are required to complete all training record keeping on the day that training is conducted. This includes daily attendance forms, CDPH283A forms and CDPH276C forms.

Ensure That Training Records are Complete Prior to PD Review and Signature of CDPH283B form.

The NA Instructor is responsible for ensuring that all training records are complete prior to review and signature by the RN Program Director.

Processing of Forms Submitted Upon Enrollment

- A. The CDPH283B form, the documentation of Live Scan and all required medical clearance documents are submitted to the ADCR.
- B. The Administrator will produce a roster of students, generate student training records and forward these to the NA Instructor..
- B. During the training program all training documents are the responsibility of the NA Instructor.
- C. All records are returned to the Administrator at the end of the NATP.

Policy Title: Grievance, Complaint, Issue Review Process		Approved Date: **/**/****
Applicable Standard: CCR, Title 22, Div 5, Ch 2.5	Prepared by: RN Program Director	Effective Date: **/**/****
CCR, Title 5, Division 7.5	Approved by: Administrator	Revision Date: n/a

Policy: Every student enrolled in the NATP, every faculty member working for the NATP, and every facility resident who interacts with students and faculty are entitled to fair, ethical treatment that falls within federal, state and local statutes, regulations and policies, that meets the policies of host facilities, and meets the policies and procedures of the NATP.

Purpose: To establish guidelines under which students will be informed of their rights to file grievances and complaints and to establish process under which grievances and complaints from students, faculty, host facilities or other parties are to be investigated and acted upon.

Scope: This policy applies to every employee who is involved in the NATP.

Responsibilities: Administrator

- Serve as final review authority for grievances, complaints and issues.
- Serve as liaison between the facility, NATP faculty, CDPH representatives, students, and students and/or faculty involved in grievance, complaint and issues.
- Serve as the lead investigator for cases in which grievances or complaints are filed against the PD, or in which CDPH, or another regulatory agency is a party to the case.
- Serve as a reviewer for cases in which grievances or complaints are filed against NA Instructors, CMA students, or host facilities.

RN Program Director (PD)

- Serve as the lead investigator for cases in which grievances or complaints are filed against NA Instructors.
- Serve as a reviewer for cases in which grievances or complaints are filed against the NATP students, or host facilities.

NA Instructors

- Serve as the lead investigator for cases for cases in which grievances or complaints are filed against the NATP students, or host facilities.

Procedure:

Instructing Students' on Grievance and Complaint Procedures

1. All students will be informed of their right to file grievances with the California Department of Public Health (CDPH).
 - A. Contact information for CDPH will be included in Student Enrollment Agreements, which will be provided to students during their mandatory orientation meeting. This will include phone numbers, e-mail address, mailing address and website for each agency.
 - B. Contact information for CDPH will be included in Student Catalogs, which will be provided to students during their mandatory orientation meeting. This will include the phone numbers, e-mail address, mailing address and website for each agency.
2. The process for filing a grievance or complaint will be presented to students by the PD during the mandatory orientation meeting. This will include the process for contacting the NA Instructor, PD, and Administrator outside of the classroom setting in order to protect the student's anonymity.

Definition of Grievance, Complaint and Issue

A ***grievance*** is an allegation of unfair treatment, violation of workplace rights, harassment, or failure to provide proper respect in the training setting. A grievance can be filed by a student, a faculty member, a member of the host facility staff, a member of the host facility's administration, or a resident of the host facility. A grievance can be filed against a student, a faculty member, a member of the facility staff or administration, or a resident.

A ***complaint*** is an accusation of a violation of any statute, regulation or policy, including the ATP Policies and Procedures. A complaint can be filed by a student, a faculty member, a member of the host facility staff, a member of the host facility's administration, or a resident of the host facility. A complaint can be filed against a student, a faculty member, a member of the facility staff or administration, or a resident.

An ***issue*** is a grievance or violation that involves agencies outside of the ATP, it's staff and students, or the host facility. Examples could include a student who is cited by any party for failure to provide proper care, or who is either a witness to, or a party to an incident that comes under investigation by CDPH or legal authorities.

Grievance and Complaint Investigation

The NATP's preferred approach is to have grievances and complaints investigated and resolved at the lowest level possible in its hierarchy, and in the most expeditious fashion that can create a fair outcome. Most often grievances will be filed by students to their NA Instructor.

However, any person who wishes to file a grievance or complaint is entitled to do so at the level of their choosing. If a student chooses to bypass their NA Instructor, they may present their grievance or complaint to the PD, to the Administrator, or to CDPH. The CDPH's policy is to honor the grievance or complaint filer's choice.

1. Any staff member who either receives a grievance or complaint, or who chooses to file one, is required to notify the Administrator within 24 hours. This notification must indicate the following:
 - A. The identity of the person or entity filing the grievance or complaint, unless that person has a compelling desire to remain anonymous, which must be explained.
 - B. A concise description of the grievance or complaint.
 - C. A recommendation on how to proceed in the investigation.
2. If the grievance or complaint is filed through a channel other than the NA Instructor or PD, a decision on who will conduct the investigation will be made by the Administrator.
3. No staff member will conduct an investigation of a grievance or complaint that names them as the cause of the grievance or complaint.
4. Once an investigator has been assigned, that individual must review all elements of the case in the most expeditious manner possible. As a general rule, investigations should be completed within 3 business days. This can be extended if necessary, but only in consultation with the Administrator.
5. The investigator must submit their report on the case on the Grievance/Complaint Investigation Report Form. This must include a recommendation for remediation.

Investigation Report Forms will be reviewed by the NATP Staff, with the final review being conducted by the Administrator. The Administrator must agree in writing to any recommendation for remediation that involves taking disciplinary action against a student or staff member before that action can be implemented.

Issue Investigation

When possible, issues will be investigated and resolved in the same fashion as grievances or complaints. However, this will not always be possible, and special circumstances must be taken into consideration.

1. *Involvement of Government Agencies*—if a government regulatory, or law enforcement agency is involved in an issue, the NATP faculty will automatically refer the issue to the Administrator.
2. *Legal, Liability and Health Care Issues*—faculty and students have insurance coverage that provides them with protection if they become involved in an issue that impacts legal liability or health care concerns for them.
 - A. Faculty are covered by corporate liability and workmen's compensation insurance policies.
 - B. Students are covered by corporate liability and workmen's compensation insurance policies.
3. *Issues Involving Concern for Safety*—If a grievance or complaint alleges that a student or faculty member represents an active danger to the safety of a facility resident, a staff member, a faculty member or student, that individual will be removed from the host facility immediately and barred from returning until an investigation has been completed.
 - A. If the investigation substantiates the grievance or complaint, the individual who was subject to the complaint will be terminated from the training program, or from employment. If appropriate, CDPH and local law enforcement will be notified by the Administrator.
 - B. If the investigation exonerates the subject of the complaint every effort will be made to compensate them for the missing time they lost. For students this may include providing them with additional instructor time at no cost, or, if necessary, allowing them to make up lost time with a subsequent class.

SCHOOL

SCHOOL Investigation Report: <input type="checkbox"/> Grievance <input type="checkbox"/> Complaint	
Date Investigation Started:	Date Finished:
Name of Investigator:	
Subject of Investigation:	
Reason for Investigation:	
Details of Investigation Conducted (people interviewed, documents reviewed, etc.):	
Key Findings of Fact:	
Recommendation:	
Signature of Investigator:	Date:
Reviewed By:	
Decision of Reviewer:	
Signature of Reviewer:	Date: