*NAC FAQ*

*(Nursing Assistant Training Program Frequently Asked Questions)*

**Summary**

Below are the questions answered within this document:

**Are nursing facilities required by law to reimburse their employees for NAC training and testing costs?**

**How do facilities properly submit a NAC Reimbursement Packet since it contains confidential information?**

**How can NAC students get reimbursed for their training and testing costs?**

**How should a nursing facility go about obtaining reimbursement for student testing?**

**Can we be reimbursed for supplies and moveable assets even if they cost over $750 (the threshold for a Fixed Asset)?**

**Do nursing facilities have to pay employees in a lump sum all at once?**

**If paying employees quarterly, what do nursing facilities need to submit to the State for** **reimbursement?**

**What are common unallowable/restricted expenses?**

**What supporting documentation is required to receive reimbursement?**

**Don’t see your question listed? Contact Melissa Ayala, NAC Lead, at** **Melissa.Ayala@dshs.wa.gov** **or (360) 725-2416.**

**Questions and Answers**

Q: **Are nursing facilities required by law to reimburse their employees for NAC training and testing costs?**

A: **Yes.** All nursing facilities with a Medicaid contract are required by Federal law to provide 100% reimbursement for NAC training and testing costs to their employees, provided they meet the requirements. As part of the Omnibus Budget Reconciliation Act (OBRA) of 1987, Medicare and Medicaid regulations were amended to require the certification of nursing assistants employed by Medicare and Medicaid participating facilities. **The Code of Federal Regulations provides the following direction regarding the obligation and responsibilities for payment or reimbursement to Nurse Aides (NA) for Nursing Assistant Training and Competency Evaluation Program (NATCEP) training course work at 42 CFR §483.158(b)**

(b) FFP is available for State expenditures associated with nurse aide training and competency evaluation programs and competency evaluation programs only for-

(1) Nurse aides employed by the facility.

(2) Nurse aides who have an offer of employment from a facility.

(3) Nurse aides who become employed by a facility not later than 12 months after completing a nurse aide training and competency evaluation program or competency evaluation program; or

(4) Nurse aides who receive an offer of employment from a facility not later than 12 months after completing a nurse aid training and competency evaluation program or competency evaluation program.

Nursing facilities are **not** allowed to enter into a contract with the student to continue employment with the facility providing the training.

Q: **How do facilities properly submit a NAC Reimbursement Request since it contains confidential information?**

A: Beginning January 31, 2022, NAC reimbursement requests **MUST BE SENT VIA SECURED EMAIL OR IN AN EMAIL REPLY** to a secured email originated by DSHSALTSANACReimbursement@dshs.wa.gov. If you do not have the ability to secure an email and did not receive a secure email to reply to, contact the email address above with the **Subject**: Secure Email Needed.

* All NAC reimbursement packet submissions to be ***sent via secured email OR in a secured reply*** to the email above.
* In your secured email or secured reply, change the **Subject**: xx Quarter 202x NAC Submission.
* If you need a secured email to reply to but did not receive one, please send an email to DSHSALTSANACReimbursement@dshs.wa.gov with the **Subject**: Secure Email Needed.

Q: **How can NAC students get reimbursed for their training and testing costs?**

A: **The Washington State NAC reimbursement program only reimburses nursing facilities.** Students must contact the nursing facilities in their area to find out which offer reimbursement and how they make their payments. Some do a lump sum payment, but most pay quarterly over a year. All facilities with a Medicaid contract must offer reimbursement to NAC students, provided that the nursing facility is the first one the student works at within a year of completing their training and their training wasn’t paid for with a scholarship or some other form of public funding. For a current list of facilities with a Medicaid contract, see the bottom of our webpage at <https://www.dshs.wa.gov/altsa/management-services-division/nursing-assistant-certified-reimbursement-forms> and look for the “2018 Medicaid percentage used to calculate reimbursement” Excel document.

Q: **How should a nursing facility go about obtaining reimbursement for student testing?**

A: There are two ways nursing facilities can obtain reimbursement for student for testing:

1. They can either pay for the student’s test and then submit for reimbursement through the state
2. Or, they can have the student pay for the test and then reimburse the student for all costs upon certification and then request reimbursement from the state.

A nursing facility cannot request reimbursement through the state before they pay for testing.

Q: **Can we be reimbursed for supplies and moveable assets even if they cost over $750 (the threshold for a Fixed Asset)?**

A: Yes. Supplies and moveable asset expenses over $750 per item will be paid through the NAC training program. **This is for classroom specific items only** and should correspond to average class sizes. For instance, if a facility generally only teaches 10 students, we will not allow 20 computers/tablets/etc. to be reimbursed. We would not allow items such as a bed hoist, since that is equipment that is normally used in the nursing home and could be borrowed for the class.

Q: **Do nursing facilities have to pay employees in a lump sum all at once?**

A: No. They can pay in a lump sum, but they can also spread out the payments over a year if you pay at least quarterly. Also, if paying quarterly they wouldn’t have to pay the remaining amount(s) if the employee left their employment before the year was up.  Conversely, employees do not have to pay the facility back if they leave before the year is up.

Q: **If paying employees quarterly, what do nursing facilities need to submit to the State for reimbursement?**

A: Nursing facilities must submit documentation from the employee showing the total cost, with a complete breakdown of charges, when filling out the reimbursement request. The nursing facility must also provide a copy of the check or payroll statement showing how much they paid the student during the current quarter. In addition, the nursing facility must provide a copy of the repayment plan contract provided to the student and specify which payment the reimbursement is covering. **Non-reimbursable items** include, but are not limited to, drug tests, background checks, and licensing fees paid to the Department of Health. These are not eligible for reimbursement through the NAC program, and if they are included in the packet, they will be disallowed and removed.

Q: **What are common unallowable/restricted expenses:**

A: Common unallowable/restricted expenses are as follows, but not limited to:

* For instructors, only 150 hours TOTAL for all teachers and helpers are allowed **per** class.
* For instructors, payroll taxes are limited to 7.85% of each person’s total hourly pay for the class (.0785 if multiplying times pay). We will disallow any amount claimed over 7.85%
* Department of Health expenses (including **nursing license application fees**) are non-allowable expenses.
* Utility bills are non-allowable expenses.
* Graduation gifts, awards, snacks, and celebrations are non-allowable expenses.
* Supply expenses from your facility’s stock supplies are non-allowable expenses.
* Train the trainer is a non-allowable expense through this program.
* Holiday and Overtime pay are non-allowable expenses through this program.
* **Supplies are limited to the number of students taught for the quarter.** For example, if you buy 10 books but only had 6 students, you can only claim 6 books for that quarter. You may mark on the receipt/bill that you used 6 for that quarter and then use the same receipt/bill for a subsequent quarter to claim the remaining 4 books (if you have 4 or more students that subsequent quarter). You may do this until all items have been claimed.

Q: **What supporting documentation is required to receive reimbursement?**

A: ***For All Instructors:***

* Payroll report or paystub identifying instructor, clearly showing name, SSN, and hourly wage.

***For Outside CPR & First Aid:***

* Proof of payment, (e.g., copy of check, cash receipt).
* Copy of invoice or statement.

***For Amount Reimbursed to Other and Amount Paid for Testing:***

* Copy of invoice or statement with breakdown of class components and cost of each component. (e.g., workbooks, supplies, registration fees).
* Copy of payment method (e.g., check copy, credit card statement, cash receipt).

***For Amount Reimbursed Online per Student:***

* The nursing facility must provide proof of their approved curriculum change from the Department of Health in order to incorporate the online training module and receive reimbursement.
* The nursing facility must provide proof of purchase for the online training program; proof includes the invoice which notes that the student login credential or that the monthly subscription was purchased along with payment verification (this can be a check or the credit card statement showing the purchase was made).
* A copy of the certification that the students receive upon program completion must be submitted with the quarterly reimbursement packet.
* The facility requesting reimbursement must verify that the student has not completed the program at another facility as the first facility receives the reimbursement.

***For Amount Reimbursed to Student:***

* Copy of invoice or statement for class.
* Copy of payment method (e.g., check copy, credit card statement, student pay stub).
* If reimbursement is part of a reimbursement repayment plan, the facility must provide a copy of the repayment plan contract provided to the student and specify which payment this reimbursement is covering.