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DIVISION OF QUALITY ASSURANCE

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October 1, 2014

Tom Ramsey  
Vice President of Public Policy & Advocacy  
LeadingAge Wisconsin  
204 South Hamilton Street  
Madison, WI 53707

Dear Mr. Ramsey:

Thank you for your September 17, 2014 email requesting additional consideration of the Division of Quality Assurance (DQA) interpretation of 2013 WI Act 357 criteria for nurse aide reciprocity to the Wisconsin Nurse Aide Registry.

The DQA Office of Caregiver Quality (OCQ) has given careful consideration to the questions you have raised. We recognize the importance of developing reasonable interpretation to the provisions outlined in DHS 129 and in 2013 WI Act 357 to enhance the ability of WI providers to better meet the needs of the residents they serve with well-trained, competent nurse aides.

DQA/OCQ has reconsidered the decision to accept only states that administer the National Council of State Board of Nursing (NCSBN) National Nurse Aide Assessment Program (NNAAP) as the competency evaluation program for persons who work as nurse aides. Wisconsin will now accept any of the 3 nationally recognized standardized nurse aide competency exams which include PearsonVue, Prometric or Headmaster. These standardized competency exams include both a written and skills portion of the exam as required by DHS 129.

I have included a document titled "Reciprocity to the WI Nurse Aide Registry" which identifies several ways that a nurse aide from another state can satisfy Wisconsin's requirements and be included on the WI Nurse Aide Registry. I have summarized parts of the document to address your concerns regarding the bordering states of Iowa, Illinois and Michigan:

1. Nurse aides in good standing on registries in states with training programs which are less than Wisconsin's 120 hour requirement, who have successfully completed a standardized nurse aide competency exam and have worked a minimum of 2088 hours as a nurse aide in the last 24 months are granted reciprocity and included on the WI Nurse Aide Registry.

This change allows nurse aides from 31 states, including Michigan, who meet these criteria be included on the WI Nurse Aide Registry.

2. Nurse aides in good standing on registries with training programs which meet or exceed Wisconsin's 120 hour requirement but who have not successfully completed a standardized nurse aide competency exam must take a standardized competency exam in order to qualify for placement on the WI Nurse Aide Registry.

Illinois requires 120 training hours for nurse aides. However, Illinois only requires a written portion for the competency exam. Nurse aides from Illinois have been required to test in order to transfer to Wisconsin for over ten years.

Tom Ramsey  
Page 2  
October 1, 2014

3. Nurse aides in good standing on registries with training programs which are less than Wisconsin's 120 hour requirement, have not successfully completed a standardized competency exam but have worked a minimum of 2088 hours as a nurse aide in the last 24 months must take a standardized competency exam in order to qualify for placement on the WI Nurse Aide Registry.

Iowa requires 75 training hours for nurse aides. Iowa does not test with a nationally recognized testing entity.

In your email, you also identify concerns with PearsonVue's contradiction to OCQ regarding the requirement that Illinois nurse aides be required to successfully complete the WI competency exam in order to be placed on the WI Nurse Aide Registry. We understand the frustration that likely caused you and your member. OCQ will again remind PearsonVue staff to refer questions regarding reciprocity directly to OCQ staff. Your email also highlights some of the confusion between the WI Nurse Aide Candidate Handbook and the Out-of-State Application. OCQ staff will review, clarify and update the requirements for reciprocity.

The Division believes that the decision to accept any of the 3 nationally recognized standardized nurse aide competency exams is fair and reasonable. This change will allow greater flexibility for nurse aides in states that administer any of these standardized tests to be included on the WI Nurse Aide Registry while still maintaining a minimally competent entry level nurse aide who is reasonably expected to perform certain tasks in order to meet the needs of persons served in our health care facilities.

I must reiterate that Wisconsin's process, once complete with successful passage of all tests, permits the individual to work in one of four (4) licensed settings; home health, hospices, hospitals, and nursing homes. We have not determined if other states following this process with similar laws, hence we must also ensure that the individual is competent to work across these settings.

If you have any additional questions, please contact Laurie Arkens, OCQ Director, at (608) 264-9876 or [Laurie.Arkens@dhs.wisconsin.gov](mailto:Laurie.Arkens@dhs.wisconsin.gov).

Sincerely,



Otis L. Woods  
Administrator

Enclosure  
Reciprocity to the Wisconsin Nurse Aide Registry

cc: Laurie Arkens, Director, Office of Caregiver Quality

## Reciprocity to the Wisconsin Nurse Aide Registry

A nurse aide from another state must be included on the Wisconsin Nurse Aide Registry before providing any hands-on care in any Wisconsin nursing home, hospital, home health agency or hospice. There are several ways that a nurse aide from another state can satisfy the Wisconsin requirements and be included on the WI Nurse Aide Registry:

Nurse aides in good standing on registries in the following states with **training programs which meet or exceed Wisconsin's 120-hour requirement and have successfully completed a standardized competency exam\*** are granted reciprocity and included on the WI Nurse Aide Registry:

*Alaska – Arizona – California – Delaware – District of Columbia – Florida – Idaho – Oregon – Virginia*

A nurse aide who has completed a 120-hour or more program in any state not listed above and successfully completed a standardized competency exam\* is also granted reciprocity. Several states have multiple training programs which offer training hours that vary from the minimum 75 hours and above. Michigan and Minnesota are two examples of states that have additional programs approved above their 75-hour minimum.

Nurse aides in good standing on registries in the following states with **training programs which meet or exceed Wisconsin's 120-hour requirement but not have successfully completed a standardized competency exam\*** may take a **standardized competency exam\*** in order to qualify for placement on the WI Nurse Aide Registry:

*Illinois – Maine – Missouri – West Virginia*

A nurse aide from any of these states will only need to take a standardized competency exam\* (not retrain).

Nurse aides in good standing on registries in the following states with **training programs which are less than Wisconsin's 120-hour requirement, have successfully completed a standardized competency exam\* and have worked a minimum of 2088 hours as a nurse aide in the previous 24 months** are granted reciprocity and included on the WI Nurse Aide Registry once employment is verified by the Wisconsin Department of Health Services:

*Alabama – Arkansas – Colorado – Connecticut – Delaware – Georgia – Hawaii – Louisiana – Maryland – Michigan – Minnesota – Mississippi – Montana – Nevada – New Hampshire – New Jersey – New Mexico – New York – North Carolina – North Dakota – Ohio – Oklahoma – Pennsylvania – Rhode Island – South Carolina – South Dakota – Tennessee – Texas – Utah – Vermont – Washington – Wyoming*

A nurse aide who has completed a 120-hour training program in any of the above states and has taken a standardized competency exam\* is eligible for placement without employment verification. Several states have multiple training programs which offer training hours that vary from the minimum 75 hours and above. Hawaii and Texas are two examples of states that have additional programs approved above their 100-hour minimum.

Nurse aides in good standing on registries in the following states with **training programs which are less than Wisconsin's 120-hour requirement, have not successfully completed a standardized competency exam\* but have worked a minimum of 2088 hours as a nurse aide in the previous 24 months** may take a **standardized competency exam\*** in order to qualify for placement on the WI Nurse Aide Registry:

*Indiana – Iowa – Kansas – Kentucky – Massachusetts – Nebraska*

A nurse aide from any of these states will only need to take a standardized competency exam\* (not retrain).

Nurse aides in good standing on registries in states with **training programs which are less than Wisconsin's 120-hour requirement who do not meet any of the eligibility criteria above must successfully complete:**

- a 120-hour training program and successfully complete a standardized competency exam\* or
- a 45-hour bridge program and successfully complete a standardized competency exam\*

in order to qualify to be included on the WI Nurse Aide Registry.

\*DHS 129.05 (5) (b) allows an individual who is eligible to be included in the registry if the individual has successfully completed an approved training program and a competency evaluation program in another state that meet criteria for acceptance in this state. At this time, Wisconsin criteria defines a *standardized competency exam* as an evidence-based, legally defensible, standardized nurse aide competency examination consisting of both a written (or oral) exam and skills evaluation administered by Headmaster, Prometric or PearsonVue.

## Reciprocity to the Wisconsin Nurse Aide Registry

### Nurse Aide Training Requirements

WI Reciprocity	State	Minimum Training Hours	Minimum Clinical Hours
With employment verif	Alabama	75	16
Yes	Alaska	140	80
Yes	Arizona	120	40
With employment verif	Arkansas	90	16
Yes	California	150	100
With employment verif	Colorado	75	16
With employment verif	Connecticut	100	50
Yes	Delaware	150	75
Yes	District of Columbia	120	45
Yes	Florida	120	40
With employment verif	Georgia	85	16
With employment verif	Hawaii	100	70
Yes	Idaho	120	40
Must test	Illinois	120	40
With employment verif and test	Indiana	105	75
With employment verif and test	Iowa	75	30
With employment verif and test	Kansas	90	45
With employment verif and test	Kentucky	75	16
With employment verif	Louisiana	80	40
Must test	Maine	180	70
With employment verif	Maryland	100	40
With employment verif and test	Massachusetts	75	16
With employment verif	Michigan	75	16
With employment verif	Minnesota	75	16
With employment verif	Mississippi	75	16
Must test	Missouri	175	100
With employment verif	Montana	75	25
With employment verif and test	Nebraska	75	n/a
With employment verif	Nevada	75	n/a
With employment verif	New Hampshire	100	60
With employment verif	New Jersey	90	40
With employment verif	New Mexico	75	n/a
With employment verif	New York	100	30
With employment verif	North Carolina	75	16
With employment verif	North Dakota	75	16
With employment verif	Ohio	75	16
With employment verif	Oklahoma	75	16
Yes	Oregon	150	75
With employment verif	Pennsylvania	80	37.5
With employment verif	Rhode Island	100	20
With employment verif	South Carolina	80	40
With employment verif	South Dakota	75	16
With employment verif	Tennessee	75	35
With employment verif	Texas	100	40
With employment verif	Utah	80	16
With employment verif	Vermont	80	30
Yes	Virginia	120	40
With employment verif	Washington	85	50
Must test	West Virginia	120	55
NA	Wisconsin	120	32
With employment verif	Wyoming	75	16

Note that there are exceptions to the Reciprocity column based on the actual number of hours of training in cases where the program the aide completed was greater than the state minimum requirement. Nurse aide training requirements by state may be found at <http://phinational.org/policy/nurse-aide-training-requirements-state>.