



# Oregon

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## **NF-22-043 – Provider Alert (Revised Links)**

**Date:** Revised July 21, 2022

**To:** All Nursing Facilities

**From:** Safety, Oversight and Quality  
DHS Aging and People with Disabilities Program

**RE:** **Personal Care Assistant Training Program**

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The Oregon Department of Human Services (ODHS), Safety, Oversight and Quality (SOQ) unit is aware of the ongoing impact the statewide staffing shortage of Certified Nursing Assistants (CNAs) has had on nursing facilities. Due to these ongoing staffing challenges, the Oregon Department of Human Services is implementing guidance for the long-term use of Personal Care Assistants (PCAs) in nursing facilities. This guidance adds additional training and limits the scope of practice for PCAs in order to promote the highest quality of care in nursing facilities.

### **PCA Minimum Pre-Service Training Requirements**

Prior to a PCA providing direct care to residents, the facility must ensure each PCA has completed all of the following trainings:

- Personal Care Assistants must successfully complete one of the following free online training courses:
  - **8-hour online training course and associated skills competency checklist** developed by the American Health Care Association in association with Academic Platforms, LLC (branded as CNAOnline.com) - <https://educate.ahcancal.org/p/ORTNA>; or
  - **9-hour online training course and associated skills competency checklist** developed by [EduCare© in association with LeadingAge](#).

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- ❑ The Personal Care Assistant Training Program must include successful completion of the following free supplemental online training courses:
  - **Oregon Care Partners:** [Infection Prevention: What You Need to Know About COVID-19 for Assisted Living, Residential Care and Skilled Nursing Communities](#);
  - **AHCA/NCAL:** *Temporary Feeding Assistant* - <https://educate.ahcancal.org/p/ORTFA>; and
  - **Making Oregon Vital for Elders (MOVE):** [Let's Get Real - Being Person-Centered in a Task Oriented World](#).
- ❑ Additionally, nursing facilities must ensure each PCA receives all facility specific training and orientation necessary to ensure the PCA can competently provide care and services for which they will be assigned. These trainings shall at a minimum, include topics such as resident care planning, residents' rights, and identifying and reporting abuse, neglect and misappropriation of resident property as outlined in [OAR 411-086-0310](#).

*Note: Nursing homes are not required to have a current Oregon State Board of Nursing (OSBN) approved CNA training program in order to participate in the Personal Care Assistant training program.*

**PCA Allowable Duties**

Nursing facilities are responsible for the care and services provided by Personal Care Assistants and shall not allow any PCA to perform tasks in which they are not adequately trained and determined competent. PCAs must always be under the direct supervision of a licensed registered nurse or licensed practical nurse. **PCAs cannot perform duties that require NA/CNA certification and cannot be used in place of NA/CNAs for minimum staffing requirements.**

Personal Care Assistants are limited to performing the following types of duties:

- ❑ Duties allowed under the dining assistant program as outlined in [411-086-0250\(7\)](#), and shall not assist with feeding residents with complicated feeding problems,

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- Assisting with personal grooming,
- Distributing meal trays, snacks and water,
- Assisting with safety and emergency procedures,
- Transporting residents in wheelchairs,
- Socializing with residents,
- Supporting resident activities, and
- Other non-CNA tasks such as bed making, cleaning, etc.

**Documentation**

Nursing facilities are responsible for maintaining the following documentation showing that each PCA has completed the PCA training program. This documentation shall include, at a minimum:

- Evidence the individual has successfully completed either the 8-hour or 9-hour training program and pass the online exam with a passing score of 80% or higher,
- Certificate or proof of completion for all supplemental online trainings as required above,
- Documentation of supervised training and verification of demonstrated skills by a member of the nursing staff at the facility (sample skills checklist is included with this alert), and
- Documentation the PCA has successfully completed all facility specific orientation and training.

**Using RN and LPN Students as PCAs**

Nursing homes may employ current nursing students who are enrolled in an RN or LPN training program in Oregon as Personal Care Assistants without taking the 8-hour or 9-hour training program if the nursing student has:

- Completed Nursing 101 and Nursing 102,
- Successfully completed the supplemental online training courses outlined above,
- Received at least 2 hours of supervised training, and
- Documentation of supervised training and verification of demonstrated skills by a member of the nursing staff at the facility (sample skills checklist is included with this alert).

Note: Nursing students hired as PCAs do not have a larger scope of duties than other PCAs. Personal Care Assistants may only perform tasks that are consistent with typical CNA job responsibilities that do not require NA/CNA certification.

**Minimum Staffing Requirements and Mitigation**

**PCAs must not be counted toward the minimum staffing requirement as outlined in OAR 411-086-0100(5). For staff to be counted as NA/CNAs, they must complete the required Nurse Aide Training and Competency Evaluation Program (NATCEP) per federal and state regulations and successfully pass the exam.**

SOQ may mitigate the staffing shortages if **all** of the following have been documented in the quarterly staffing report:

- Facility has attested that all resident care was provide for each shift,
- Facility has documented what attempts were made to fill the NA/CNA shortages for each shift, and
- Facility has outlined what specific duties PCAs completed on each shift to ensure care was provided to all residents.

If you have any questions, please contact your licensing team:

[NF.licensing@dhsosha.state.or.us](mailto:NF.licensing@dhsosha.state.or.us)

For general information about the DHS Office of Safety, Oversight and Quality, visit the DHS Web site at [www.oregon.gov/DHS/](http://www.oregon.gov/DHS/).

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***ePOC Practice Tip:***

Facility Administration - ASPEN Web: e POC (electronic Plan of Correction) is the centralized worksite for completing all steps in CMS & State survey POC processing including:

- Receiving and reviewing Statements of Deficiencies (SODs),
- Formulating POCs,
- Submitting POCs and if desired,
- Attaching supporting Informal Dispute Resolution request & documents.

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Register and maintain an active ePOC account to efficiently access your surveys at no cost to your facility. ePOC registration passwords are effective for 90 days and must be renewed timely to maintain an active ePOC account. As an active ePOC user, you will receive notifications of pending password expiration with renewal instructions. It may also be advantageous to have multiple ePOC registrants for your facility to ensure an active ePOC account is maintained at all times. For ePOC assistance and/or questions contact QTSO (<https://www.qtso.com>).