

## CNA Consolidation: What You Need to Know

In support of the new administrative rules consolidating the CNA levels (effective July 1, 2025), the Oregon State Board of Nursing Board (OSBN) hosted virtual lunch & learn education events in August and October, 2024, and March 2025 to discuss the revised Oregon Administrative Rules (Chapter 851 Division 63 Standards and Authorized Duties for the Certified Nursing Assistant and Certified Medication Aide).

Following is a collection of commonly asked questions with answers including those from the lunch and learn events.

1. **Q: Will there be any changes to the nursing assistant curriculum content?**  
**A:** No, there will not be any changes to the nursing assistant (NA) curriculum content that has been in place since August 1, 2023. NA curriculum task force and rule advisory committee members reviewed the NA curriculum, and no changes or additions were recommended. The Board approved keeping the NA curriculum as was previously approved in 2023.
2. **Q: Can an employer do a group teaching for those additional authorized duties?**  
**A:** Certainly. It is up to each employer to manage teaching and competency validation by a Registered Nurse (RN) representing the CNA employment site.
3. **Q: How soon can an organization transition to the CNA role vs CNA 1 and CNA 2?**  
**A:** An organization may begin transitioning now.
4. **Q: I am a CNA2 and have already invested in the CNA2 training. How can I remain competitive for positions now that there is only one level?**  
**A:** The skills you learned during your CNA2 training are still useful. If you're using certain skills in your job now, you will likely continue to use them. Contact your employer regarding which skills, training and competency validation will be needed for your role.
5. **Q: If I learn CNA2 skills at my job but then decide to get a job at a different location, will I still be able to use the skills I learned?**  
**A:** If it is a new employer, you will need to complete training and competency evaluation again. If it is the same employer, but a different location, it will be up to the employer to determine.

6. **Q: If a CNA who is working in home health or hospice has documentation of competency in an additional authorized duty, does this mean that “duty” does not need to be delegated? (I think some of us in community-based care will be confused on this point.)**

**A:** Community based care settings are no longer included in Div. 63 since they are governed by the Oregon Department of Human Services, Residential Care and Adult Foster Home Divisions.

7. **Q: Will it be up to each employer to figure out how they want to document the competency of an additional authorized duty or does the OSBN have a suggested form or format?**

**A:** Yes, it is up to each employer to determine how additional authorized duties are documented. OSBN does not have suggested competency validation forms for employers to use to document additional authorized duties. If your organization has someone in a clinical educator role, collaborate with them to adopt what they already have in place or develop one that will meet your organization’s needs. The frequency of competency validation is up to each organization to determine, which may be based on the clients’ needs, safety concerns, and other external regulatory bodies’ requirements.

8. **Q: Is there a frequency recommended or required for documenting the maintenance of the competency in the additional authorized duty?**

**A:** It is up to the organization to determine the frequency and maintenance of the competency of the selected additional authorized duties for their CNAs.

9. **Q: Can a CNA2 teach the additional authorized duties to the current CNA1s or do they need to be an RN?**

**A:** No, RNs must teach and perform competency validation.

10. **Q: Will the State be checking for competency of additional authorized duties of CNA during survey, to ensure that the duties have been trained.**

**A:** OSBN does not survey employment sites. You may want to reach out to ODHS.

For more information on the journey to consolidation of the two CNA levels, please review these previous *Sentinel* articles available on the OSBN website ([www.oregon.gov/osbn/pages/publications](http://www.oregon.gov/osbn/pages/publications)):

- Part 1: *OSBN Works to Remove Barriers for CNA Applicants*—February 2023 *Sentinel*
- Part 2: *OSBN Journey to Removing Barriers to Becoming a CNA in Oregon Continues*—February 2024 *Sentinel*
- Part 3: *Removing Barriers to Becoming a CNA in Oregon: How Do I Apply for My CNA Certificate?* May 2024 *Sentinel*