

ForwardHealth **UPDATE**

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REIMBURSEMENT INCREASE FOR NURSE AIDE TRAINING AND TESTING

The Medicaid Maximum Cap (Max Cap) determines the maximum amount Wisconsin Medicaid will reimburse a nursing facility for certified nursing assistant (CNA) training and testing costs, as well as the maximum amount a nursing facility is required to reimburse a CNA. The facility is responsible for submitting the request and facilitating the reimbursement.

Beginning January 1, 2026, ForwardHealth will:

- Increase the Max Cap for CNA training from \$225.00 to \$700.00.
- Increase the Max Cap for competency testing from \$61.50 to \$135.00.

Training and Testing Reimbursement Overview

Since October 2008, ForwardHealth has reimbursed nursing facilities that care for Medicaid members for the training and/or testing costs of CNAs they hire.

AFFECTED PROGRAMS

BadgerCare Plus, Medicaid

TO

Nursing Homes, HMOs and Other Managed Care Programs

QUICK LINKS

- [Forms](#) page

The information provided in this ForwardHealth Update is published in accordance with 42 C.F.R. § 483.152(c)(2).

Wisconsin skilled nursing facilities submit their claims for reimbursement through ForwardHealth.

Training and Testing Reimbursement Timing

CNAs in training have 365 days from the date they complete their classroom and clinical requirements to pass the competency test. The nursing facility must submit the reimbursement request with a training completion date within 365 days of the date the CNA passed their competency test.

ForwardHealth will deny the training portion of the reimbursement request if:

- The CNA took the test more than 365 days after completing the training.
- The nursing facility submitted the reimbursement request more than 365 days after the CNA took the competency test.

ForwardHealth will deny the entire reimbursement request if:

- The competency test date is invalid or incorrect.
- It is submitted with an invalid date of hire or with the date of hire field left blank.

CNAs can receive partial reimbursement of training and/or testing costs that they pay for themselves if they are hired by a Medicaid-enrolled nursing facility within 365 days of their certification (test) date. If the timeframe between the certification or recertification (test) date and hire date exceeds 365 days, ForwardHealth will deny the request.

Testing and Training Rate Increase

Nursing facilities must reimburse CNAs who paid for their own training and testing if that training or testing took place within 365 days of being hired. Effective January 1, 2026, when a nursing facility reimburses a CNA, they must reimburse:

- Up to a maximum amount of \$700.00 for training.
- Up to a maximum of \$135.00 for the competency test.

(Previously, a nursing facility was required to reimburse a CNA a maximum amount of up to \$225.00 for training and up to \$61.50 for the competency test.)

Nursing facilities must request reimbursement using the Nurse Aide Training and Competency Test Reimbursement Request form, F-01013 (11/2018). This form can be found on the [Forms](#) page of the ForwardHealth Portal.

REMINDER

The nursing facility is responsible for submitting the request and facilitating the reimbursement.

If the timeframe between the certification or recertification (test) date and hire date exceeds 365 days, ForwardHealth will deny the request.

Refer to the table in the [Attachment](#) to this ForwardHealth Update for answers to some frequently asked questions and more information on maximum reimbursement amounts.

Documentation Retention

Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § [DHS 106.02\(9\)](#). Providers are required to produce or submit documentation, or both, to the Wisconsin Department of Health Services (DHS) upon request. Per Wis. Stat. § [49.45\(3\)\(f\)](#), providers of services shall maintain records as required by DHS for verification of provider claims for reimbursement. DHS may audit such records to verify the actual provision of services and the appropriateness and accuracy of claims. DHS may deny or recoup payment for services that fail to meet these requirements. Refusal to produce documentation may result in denial of submitted claims, recoupment of paid claims, application of intermediate sanctions, or termination from the Medicaid program.

RESOURCES

Division of Quality Assurance

- 608-261-9315
- dhswidqa_natcep@dhs.wisconsin.gov

The information provided in this ForwardHealth Update is published in accordance with <<insert relevant citations from CE here>>

This Update was issued on 12/29/2025 and information contained in this Update was incorporated into the Online Handbook on 01/05/2026.

The ForwardHealth Update is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Medicaid Services within the Wisconsin Department of Health Services (DHS). The Wisconsin HIV Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health within DHS.

For questions, call Provider Services at 800-947-9627 or visit our website at www.forwardhealth.wi.gov/.

ATTACHMENT

Nurse Aide Training and Testing Reimbursement FAQs

Training and Testing Reimbursement

Q1: Who can submit a request to ForwardHealth (Wisconsin Medicaid) for nurse aide training and testing reimbursement?

A: Only Medicaid-certified nursing facilities can request this reimbursement.

Q2: When can a nursing facility request nurse aid training and certification reimbursement?

A: A nursing facility can request reimbursement when it is charged training or testing costs for an employee up to 365 days prior to their hire date, or when an employee incurs training or testing costs up to 365 days prior to their hire date.

Many nursing facilities with facility-based training programs do not hire prospective certified nursing assistants (CNAs) until the CNA has either completed the classroom and clinical requirements or passed the competency test. Nursing facilities must only submit a reimbursement request for a CNA they hire. They cannot receive reimbursement for CNAs they do not hire.

For example, a nursing facility has a facility-based training program. The nursing facility incurs the training costs, and the student incurs the testing costs. If the nursing facility hires the CNA, the nursing facility can get reimbursed for the training, and the CNA can get reimbursed for testing. The nursing facility must pay the CNA for the test up to the Max Cap, and the nursing facility will receive the Medicaid reimbursement based on their Max Cap utilization. The nursing facility reimbursement will be less than the Max Cap if their Medicaid utilization is 0%–89.9%.

Q3: When can a CNA receive reimbursement?

A: If a CNA pays the cost for training and testing while employed, the nursing facility should reimburse them for 100% of those costs. If the CNA paid the costs for training and testing before they were hired, they can only be reimbursed up to the Max Cap.

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Reimbursable Amount

Q4: How does Wisconsin Medicaid determine the amount of reimbursement a nursing facility can receive for CNA training and testing?

A: On October 1, 1997, Wisconsin Medicaid implemented the Medicaid Maximum Cap (Max Cap), which established a maximum amount Wisconsin Medicaid would reimburse a nursing facility for CNA training and testing costs, as well as the maximum amount a nursing facility must reimburse a CNA. As of January 1, 2026, the Max Cap is \$700.00 for training and \$135.00 for the competency test.

Nursing facilities receive a percentage of these Max Caps based on their Medicaid utilization percentage. The Medicaid utilization percentage is calculated as Medicaid patient days divided by total patient days. The Max Cap ensures that training and testing costs are properly allocated between Wisconsin Medicaid, Medicare, and private pay residents.

The following table shows the ratio of a nursing facility's Medicaid utilization to its percentage of the Max Cap.

NURSE AIDE TRAINING AND COMPETENCY EVALUATION PROGRAM REIMBURSEMENT METHODOLOGY			
Medicaid Utilization	Percentage of Max Cap Rate	Nurse Aide Training Covered Amount	Nurse Aide Testing Covered Amount
90.0–100.0%	100%	\$700	\$135
80.0%–89.9%	90%	\$630	\$121.50
70.0%–79.9%	80%	\$560	\$108
60.0%–69.9%	70%	\$490	\$94.50
50.0%–59.9%	60%	\$420	\$81
0.0%–49.9%	50%	\$350	\$67.50

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Q5: If a CNA incurs training and/or testing costs up to 12 months prior to their date of hire by a nursing facility, how much is the nursing facility required to reimburse the CNA?

A: If the CNA's training cost is \$1,000, the nursing facility must reimburse the CNA the training Max Cap of \$700.00. If the CNA's testing cost is \$150.00, the nursing facility must reimburse the CNA the testing Max Cap of \$135.00.

The nursing facility would request reimbursement through ForwardHealth and would receive the Max Cap based on their Medicaid utilization rate. The nursing facility reimbursement will be less than the Max Cap if their Medicaid utilization is 0%–89.9%.

Requirements

Q6: How often does Wisconsin Medicaid review a nursing facility's Medicaid utilization?

A: Annually. The annual effective date for any change is July 1. ForwardHealth reviews the nursing facility's most current Medicaid cost report to determine the nursing facility's reimbursement percentage.

Q7: Which date(s) should a nursing facility use to determine if a CNA can be reimbursed for training and/or testing costs?

A: The nursing facility should compare the CNA's competency test date to their hire date. If the number of days between the test date and hire date exceeds 365, the CNA cannot be reimbursed.

Q8: By what date must the nursing facility reimburse a CNA?

A: A nursing facility has up to 365 days from the hire date to reimburse a CNA who incurred training and/or testing costs within 365 days of their hire date. If a nursing facility is late in submitting a reimbursement request to Wisconsin Medicaid and ForwardHealth denies the request, the nursing facility is still required to reimburse the CNA.

Q9: What is the timing of the Max Cap change?

A: The new rate is effective January 1, 2026, and applies to any requests submitted on or after January 1, 2026.

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Documentation

Q10: Does a nursing facility need to include any receipts with a reimbursement request?

A: No.

Q11: What should a nursing facility review prior to submitting a reimbursement request?

A: A nursing facility should review these points before submitting a reimbursement request:

- Does the request contain a valid hire date?
- Was the hire date within 365 days of the CNA's certification date if the CNA incurred training and/or testing costs prior to their hire date?
- Is the training date the same as or before the test date?
- Is the request being submitted within 365 days of the latest date, either the test date or hire date, on the request?
- Was the CNA's Social Security number (SSN) and competency test date verified through the Wisconsin Nurse Aide Registry website? An incorrect SSN or competency test date on a reimbursement request will result in a denial.
- Is the CNA's "basis for inclusion" reciprocity? This means the CNA trained/tested in another state and transferred to the Wisconsin Nurse Aide Registry to work as a CNA in Wisconsin. Prior to submitting a reimbursement request for a CNA whose basis for inclusion is reciprocity, nursing facilities should contact the Division of Quality Assurance at 608-261-9315 or email dhswidqa_natcep@dhs.wisconsin.gov to confirm that the CNA can be reimbursed. Use the CNA's inclusion date for their Competency Test Date on the reimbursement request.

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