

Nurse Aide Training and Testing Reimbursement Frequently Asked Questions

Q: Who is eligible to submit a request to Wisconsin Medicaid for nurse aide training and testing reimbursement?

A: Only Medicaid-certified nursing facilities (NFs) are eligible for this reimbursement.

Q: How does Wisconsin Medicaid determine the amount of reimbursement for which an NF is eligible?

A: Wisconsin Medicaid has established a Medicaid Maximum Cap (Max Cap), which determines the maximum amount Wisconsin Medicaid will reimburse an NF for certified nursing assistant (CNA) training and testing costs, as well as a maximum amount an NF is required to reimburse a CNA. Currently, the Max Cap for training is \$225.00 and \$61.50 for the competency test.

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

Refer to the following table for the ratio of an NF'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
90.0% – 100.0%	100%
80.0% – 89.9%	90%
70.0% – 79.9%	80%
60.0% – 69.9%	70%
50.0% – 59.9%	60%
0.0% – 49.9%	50%

Q: How often does Wisconsin Medicaid review an NF's Medicaid utilization?

A: Annually. The NF's most current Medicaid cost report is reviewed to determine if the NF's Medicaid utilization has increased or decreased enough to require a change in the NF's reimbursement percentage. The annual effective date for any change is July 1.

Q: When is an NF eligible for reimbursement?

A: An NF is eligible to request reimbursement when the NF incurred training and/or testing costs for an employee or when the employee incurred training and/or testing costs within *365 days* of his or her hire date.

Federal law 42 CFR Part 483.152(c)(1) states that no one who was employed by or received an offer of employment from an NF on the date on which he or she began a facility-based nurse aide training and competency evaluation program may be charged for any portion of the program, including textbook fees and other required course materials.

Many NFs with facility-based training programs do not hire prospective CNAs until the CNA has either completed the classroom/clinical requirements or passed the competency test. Nursing facilities should only submit a reimbursement request for a CNA they hire.

For example, an NF has a facility-based training program. The NF incurs the training costs and the student incurs the testing costs. If the NF hires the CNA, the NF is eligible for training reimbursement, and the CNA is eligible for testing reimbursement.

Q: When is a CNA eligible for reimbursement?

A: Federal regulation 42 CFR Part 483.152(c)(2) states that nurse aides are not to bear any cost of training or testing if they become employed by or receive an offer of employment from an NF within 12 months of completing a nurse aide training and competency evaluation program.

In order to be in compliance with this portion of the federal regulation, an NF is required to reimburse *up to the current Max Cap* any CNA who independently completes a CNA program within 365 days of his or her hire date. Even though an NF may not receive 100 percent of the Max Cap, they are required to reimburse the CNA the Max Cap if the CNA's training and testing costs are **equal to** or **greater than** the Max Cap.

Q: Which date(s) should an NF use to determine if a CNA it has hired is eligible for reimbursement?

A: The NF should compare the CNA's competency test date to his or her hire date. If the number of days between the test date and hire date exceeds 365, the CNA is no longer eligible for reimbursement.

Q: If a CNA incurs training and/or testing costs within 12 months of hire by an NF, how much is the NF required to reimburse the CNA?

A: If the CNA's training cost is \$495.00, the NF is required to reimburse the CNA the training Max Cap of \$225.00. If the CNA's testing cost is \$100.00, the NF is required to reimburse the CNA the test Max Cap of \$61.50.

Q: By what date is the NF required to reimburse a CNA?

A: An NF has up to 365 days from the hire date to reimburse a CNA who incurred training and/or testing costs within 365 days of his or her hire date. This is referred to in the federal regulation as *pro rata*. If an NF is late in submitting a reimbursement request to Wisconsin Medicaid and the request is denied, the NF is still required to reimburse the CNA.

Q: Does an NF need to include any receipts with a reimbursement request?

A: No.

Q: What should an NF review prior to submitting a reimbursement request?

A: The following are the points an NF should review prior to submitting a reimbursement request:

- Does the request contain a valid hire date?
- If the CNA incurred training and/or testing costs prior to his or her hire date, was the hire date within 365 days of the CNA's certification date?
- Is the training date the same as or prior to the test date?
- Is the request being submitted within 365 days of the latest date on the request, either the test date or hire date?
- Was the CNA's Social Security number (SSN) and competency test date verified through the Wisconsin Nurse Aide Registry Web site? 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 in order to work as a CNA in Wisconsin. Prior to submitting a reimbursement request for a CNA whose basis for inclusion is reciprocity, NFs should contact the Division of Long Term Care at (608) 267-0996 to confirm that the CNA is eligible for reimbursement. Use the CNA's "Inclusion Date" for his or her "Competency Test Date" on the reimbursement request.