FROM: Adam Mather  
Inspector General

DATE: April 14, 2020

SUBJECT: Temporary COVID-19 Personal Care Attendant – Revisions in Red Font

Eight (8) Hour Course

Minimum Five (5) Hour Classroom and Three (3) Hour Simulation/Competency Check-Off

Overview: This temporary waiver permits a long-term care facility to employ a trained Personal Care Attendant (“PCA”) to perform defined resident care procedures that do not require the skill or training required for a State Registered Nurse Aide (“SRNA”) who has successfully completed the nurse aide training and competency evaluation program established by 907 KAR 1:450.

Scope: The PCA position is a temporary accommodation made by the Commonwealth to address work increases and staffing shortages caused by the COVID-19 pandemic. The position and its attendant training are permitted by the Office of Inspector General in collaboration with the Kentucky Department of Public Health and Department of Medicaid Services pursuant to authority granted in KRS 214.020 and Executive Order 2020-215. The PCA position will be authorized only while the Executive Order remains in effect, plus any additional time afterward that the Cabinet for Health and Family Services may deem necessary to facilitate providers’ orderly resumption of normal staffing.

Requirements:

- A candidate for training must be at least eighteen (18) years of age. There are no minimum educational requirements.
- A PCA who completes training and is employed by a facility must:
  - Satisfy the same criminal background checks requirements as required for long-term care facility employees pursuant to KRS 216.788 – 216.793;
  - Submit to a check of the nurse aide abuse registry; and
  - Be registered through the Kentucky Board of Nursing.

Training Standards:

- Completion of all training and documentation requirements for PCA candidates is the ultimate
responsible of the training/hiring facility.

- Any licensed long-term care facility may train PCA candidates without regard to any current Nurse Aide Training and Competency Evaluation Program training ban that may be in place.
- The PCA training course must be taught by an instructor who is a licensed nurse confirmed by the facility to have completed all training in accordance with 907 KAR 1:450, Section 3 necessary to be a Nurse Aide Program Instructor for the Nurse Aide Training and Competency Evaluation Program. An online training program that meets the course components identified under Required Areas of Instruction/Competency below may be used in lieu of an instructor who has completed the training required by 907 KAR 1:450, Section 3.

- Training must consist of a minimum of five (5) hours of classroom teaching and three (3) hours of supervised simulation in which the PCA candidate exhibits competency in all areas of training.
- Classroom teaching must be developed using applicable portions of the standardized Nurse Aide Training and Competency Evaluation Program Curriculum. The curriculum may be supplemented with additional resources relevant to current industry concerns and any regulatory directives or guidance concerning COVID-19.
- Upon the completion of classroom instruction, PCA candidates must simulate and demonstrate competency in all required care procedures. Under observation by the instructor, PCA candidates will first simulate procedures while working together in pairs or teams. Next, the instructor (or the instructor with the assistance of a licensed nurse) must observe each candidate’s simulation of required skills and document the candidate’s competency.
- Upon completion of the eight (8) hour course, the facility must submit the names of all PCA candidates who complete training and demonstrate required competencies to the Kentucky Board of Nursing for tracking under the Nurse Aide Registry. When requested by the Cabinet for Health and Family Services, the facility will update the names of all PCAs working in the facility at the time of the request.
- The facility must fully notify its certified and licensed staff members that PCAs have a limited scope of permissible work, and detail what duties may not be delegated to PCAs. If the facility learns that any PCA is performing duties outside the limited scope of permissible work, it must immediately intervene, stop the PCA, and reassign those duties to authorized personnel.
- PCAs shall report to the facility’s Charge Nurse/Manager on Duty.

**Required Areas of Instruction/Competency:**

I. **Resident Rights/HIPAA/Abuse & Neglect (15 minutes)**
   A. Response to a witnessed (or reported) breach
   B. Immediate reporting of Abuse and Neglect to Nurse/Manager on Duty

II. **Infection Control (30 minutes)**
    A. How infection is spread (chain of infection/modes of transmission)
       1. COVID-19 and facility policy for screening
    B. Hand Hygiene (Handwashing, Alcohol-Based Hand Rub, Cough Etiquette)
    C. Standard Precautions/Personal Protective Equipment
    D. Handling of clean and soiled linens
    E. Disinfection of common use articles/equipment/high touch objects/areas

*Note: The PCA will not be assigned or provide care or services to a resident in Isolation Precautions.*
III. Emergency Procedures (15 minutes)
A. What to do when a Resident is found on the floor
B. Choking: Heimlich Maneuver

IV. Activities of Daily Living (120 minutes)
A. Initial steps/responding to a call light
B. Obtaining a temperature (all routes other than rectal)
C. Making an unoccupied bed/handling of linens
D. Turning and repositioning the resident while in bed
E. Making an occupied bed
F. Transfer from bed to chair/wheelchair/use of gait belt-one person standby/transfer
   Note: For anything beyond a one-person transfer, the PCA may only assist and must be directed by a certified/licensed staff member.
G. Bed bath/partial bath/shower
H. Assistance with dressing/undressing
I. Assist to toilet/use of urinal (only for a resident requiring one person/standby assistance)
J. Oral care - conscious residents only
K. Devices/Use/Storage
   1. Hearing Aids
   2. Eyeglasses
   3. Dentures
   Note: Emphasis on orthotics and prosthetics must be placed by a certified nursing assistant.
L. Final steps/observations to report to the nurse

V. Skin Care/Pressure Prevention (15 minutes)
A. Basic care/interventions/devices
B. Offloading/floating heels
C. Observations to report to the Nurse/Manager on Duty
   1. Open area or skin condition observed to be lacking a dressing
      a. Emphasis on no dressing applied by the Personal Care Attendant
   2. Observed bruises, abrasions or skin tears

VI. Oxygen Use/Safety (15 minutes)
A. Nasal cannula/tubing/storage/observing liter flow
B. Potential hazards/safety

VII. Nutrition/Hydration (15 minutes)
A. Mechanically altered diets/thickened liquids/adherence to diet
B. Passing trays/retrieving trays (set up/opening packages for residents who can consume meals independently)
C. Passing ice water
D. Food storage/safety

VIII. Dementia Care (30 minutes)
A. Stages of dementia/overview
B. Tips on communicating with cognitively impaired residents
C. Recognition of when to seek additional staff assistance

IX. Mental Health/Challenging Behaviors (30 minutes)
   A. Responding to a challenging behavior
   B. Recognition of when to seek additional staff assistance
   C. Reporting a challenging behavior to Nurse/Manager on duty

X. Review of Resident Rights, Abuse & Neglect Reporting, and Reporting to the Nurse (15 minutes)
   A. Sample scenarios of situations involving resident rights, abuse and neglect
   B. Review of immediate protection of resident until assistance arrives, if abuse is in process
   C. Review of duty to immediately report to the nurse/manager on duty

XI. Facility specific policies and procedures reviewed with signed attestation
   A. Abuse and Neglect
   B. Infection Control
   C. HIPAA
   D. Recognizing signs and Symptoms related to Coronavirus

Acceptable Scope of Practice for PCAs

- Transfer - residents requiring standby assist - can help with those who need more assist as long as CNA or Nurse is present. This includes Bed to Chair
- Handling Soiled Linen
- Passing Water
- Passing Trays
- Making Beds
- Disinfecting areas of care and other common areas
- Disinfecting equipment
- Respond to call lights
- Obtain Temperatures - can NOT obtain via rectal thermometer
- Help with re positioning
- Oral Care - Must be conscious resident only - included brushing of teeth or assistance with dentures
- Place Hearing Aides - Conscious resident only
- Place eye glasses
- Combing of Hair
- Help with Bed Bath and Bed Bath Setup
- Floating Heels and Off loading heels
- Transporting Residents via wheel chair
- Showering

Please visit KBN.KY.GOV to register new PCAs