

## THE REIMBURSEMENT OF COSTS FOR THE NURSE AIDE TRAINING AND COMPETENCY EVALUATION PROGRAM (NATCEP)

### Frequently Asked Questions (FAQ)

This FAQ outlines the goal of the Nurse Aide Training and Competency Evaluation Program (NATCEP), explains how certified nurse aides (CNA) may be reimbursed for the costs of participating in this program, and provides resources for additional information. The FAQ and related NATCEP documents will be made available for your review on the MDHHS website at [www.michigan.gov/medicaidproviders](http://www.michigan.gov/medicaidproviders). The [NATCEP webpage](#) can be accessed through the following links:

[www.michigan.gov/medicaidproviders](http://www.michigan.gov/medicaidproviders) >> Billing and Reimbursement >> Provider Specific Information >> Nursing Facilities >> [Nurse Aide Training and Testing Reimbursement](#)

The FAQ was last updated October 2018.

What is the NATCEP Program?	NATCEP is a program that supports CNA training and testing for nursing facility employment.
Does an individual have to complete the program to work as a CNA in a nursing facility?	Yes, all individuals who will be or are working as nurse aides in a nursing facility must complete the competency evaluation program.
Can a CNA be reimbursed for funds spent on participation in the program?	Yes, CNAs can be reimbursed for their training and testing costs by their employer if they: <ul style="list-style-type: none"> <li>1. Complete the competency evaluation program; and</li> <li>2. Are hired by or working for a Medicaid certified nursing facility within <b>twelve months</b> of the completion of their testing.</li> </ul>
How can a CNA request reimbursement from his or her employer?	The CNA should retain the receipts and documentation from the training and testing program. The CNA should request reimbursement from his or her employer within the <b>six month</b> time period. The CNA should complete form <a href="#">MSA-1326</a> , which can be found on the website, and submit it to his or her employer.
What are the “six month” and “twelve month” time periods?	A nursing facility has <b>six months</b> after the CNA’s hire date to reimburse them for training and testing costs. A CNA must secure employment with a certified nursing facility within <b>twelve months</b> of completing his or her testing to be eligible for reimbursement.

Is a CNA who works for a hospital, hospice provider, Home and Community-Based Service provider, or independent living setting eligible for reimbursement?	No, only nursing facilities are obligated to reimburse CNAs under NATCEP.
How will a CNA be reimbursed by his or her employer?	The employer may either reimburse the CNA through a lump sum payment or installments.
How much will a CNA be reimbursed for training and testing costs?	<p>For training costs, a Medicaid certified nursing facility will be paid to reimburse a CNA up to the current limit for training costs, which can be reviewed through the <a href="#">Reimbursement Limit document</a> on the website.</p> <p>For testing costs, a Medicaid certified nursing facility will be paid based on the fees charged by the testing center. The testing center fees can be viewed in the <a href="#">Nurse Aide Testing Fee Schedule document</a> located on the website.</p> <p>A nursing facility may reimburse a CNA for more than the specified amounts for training and testing costs, but the facility will not receive additional reimbursement from Medicaid.</p>
How long does an employer have to reimburse a CNA?	The employer has <b>six months</b> from the CNA's hire date to reimburse the individual if the employer would like to be reimbursed by Medicaid.
If a CNA leaves a nursing facility before the six month time period expires, is the employer still obligated to reimburse the CNA?	No, a nursing facility is not obligated to reimburse a CNA who leaves the nursing facility for any reason before the <b>six month</b> time period expires.
If a nursing facility has not reimbursed a CNA after the six month time period has expired and the CNA is still employed with the same facility, what can the CNA do?	Please contact the LTC Services Division at 517-241-4079 for additional assistance.
If a CNA is hired by a facility after the twelve month time period has expired, is the CNA eligible for reimbursement?	No, a nursing facility is not obligated to reimburse a CNA who is hired after the <b>twelve month</b> time period expires.

<p>If a CNA leaves one nursing facility without receiving full reimbursement and is hired by another facility, can the CNA be reimbursed for the rest of the training and testing costs?</p>	<p>Yes, a CNA can request reimbursement from the second facility if:</p> <ol style="list-style-type: none"> <li>1. The CNA is hired by the second facility within the <b>twelve month</b> time period;</li> <li>2. The CNA has not been reimbursed for the full amount of his or her training and testing costs by the first facility; and</li> </ol> <p>The CNA can provide documentation to the second facility showing that the CNA has not been fully reimbursed by the first facility.</p>
<p>Can a CNA submit the form for reimbursement to the MDHHS and receive reimbursement directly from the department?</p>	<p>No, MDHHS does not directly reimburse CNAs training and testing costs associated with NATCEP. Facilities are responsible for reimbursing CNAs, and participating Medicaid facilities will be reimbursed by Medicaid through their annual cost report settlement.</p>
<p>How soon after being hired should a CNA turn in the MSA-1326 and any supplemental documentation to their employer?</p>	<p>While not required, it is recommended that the CNA turn in a completed <a href="#">MSA-1326</a> and any supplemental documentation (i.e. receipts, etc.) to their employer as soon as possible after being hired. This will help ensure that the facility reimburses the CNA within the required <b>six month</b> time frame.</p>
<p>Does the nursing facility have to reimburse the CNA for NATCEP costs?</p>	<p>Yes, a Medicaid certified nursing facility <u>must</u> reimburse a CNA for their training and testing costs. This is required by Section 9.9.C of the Nursing Facility Cost Reporting &amp; Reimbursement Appendix in the Medicaid Provider Manual. A provider that does not comply with the Medicaid Provider Manual is in direct violation of their Provider Enrollment agreement. The only exception to this policy is if a CNA has not secured employment within <b>twelve months</b> of their testing date or they have already been fully reimbursed for their NATCEP costs.</p>
<p>Does a nursing facility reimburse CNAs for NATCEP costs if the facility is in a NAT lockout?</p>	<p>Yes, a facility under a NAT lockout is still required to reimburse CNAs for their training and testing costs outside the facility. These costs are still allowable and reimbursable to the facility though their Medicaid per diem. A NAT lockout only prevents a facility from conducting and being reimbursed for facility-based training.</p>
<p>In order for a CNA to be reimbursed by a nursing facility do they need to be employed full time?</p>	<p>No, a CNA who is employed full time, part time, or per diem should be reimbursed for their training and testing costs.</p>
<p>If a CNA took out a loan to pay for their NATCEP costs what does the nursing facility reimburse the CNA for?</p>	<p>In this situation the nursing facility would reimburse the CNA for the NATCEP costs charged by the training and testing centers only. The facility is not required to reimburse the CNA for interest expense on the loan or their monthly loan payments.</p>

<p>Can a nursing facility bill any costs to a CNA for facility-based training costs?</p>	<p>No, a facility cannot bill a CNA for facility-based NATCEP training costs under any circumstance.</p>
<p>If a person hired by a facility fails to pass the CEP does the nursing facility have to reimburse them?</p>	<p>No, a nursing facility is only required to reimburse CNAs. If an individual fails to pass the CEP after the maximum number of retests the facility is under no obligation to reimburse them.</p>
<p>Can a nursing facility offset a CNA's wages in order to reimburse their NATCEP costs?</p>	<p>No, this practice is strictly prohibited by paragraph six of Section 9.9.C. of the Nursing Facility Cost Reporting &amp; Reimbursement Appendix of the Medicaid Provider Manual. If the facility is offsetting the CNA's wages they aren't truly reimbursing their NATCEP costs.</p>
<p>Is a nursing facility obligated to reimburse a CNA for fees associated with the Michigan Nurse Aide Registry?</p>	<p>Yes, Section 9.9.A. of the Nursing Facility Cost Reporting &amp; Reimbursement Appendix of the Medicaid Provider Manual requires facilities to reimburse CNAs for their initial registration and biennial registry fees. These fees are an allowable cost for nursing facility Medicaid reimbursement.</p>
<p>Can a nursing facility require a CNA to remain employed with that facility for a specific period of time greater than six months as a condition of reimbursement?</p>	<p>No, a facility must reimburse a CNA within <b>six months</b> for NATCEP related costs. Any reimbursed costs past <b>six months</b> are unallowable for nursing facility reimbursement purposes, and a facility cannot require a CNA to reimburse them if their employment is terminated.</p>
<p>Are there additional resources on NATCEP reimbursement? Where are they located?</p>	<p>CNAs can check to see if his or her employer has a published NATCEP reimbursement policy that may show how their employer fulfills the requirements of the program.</p> <p>CNAs and nursing facilities can review the entire State of Michigan policy on NATCEP reimbursement in the <a href="#">Medicaid Provider Manual</a>. The policy can be found in the Nurse Aide Training and Competency Evaluation Program (NATCEP) and Competency Evaluation Program (CEP) Section of the Nursing Facility Cost Reporting &amp; Reimbursement Appendix, which can be found on the website.</p> <p>If CNAs or nursing facilities have other questions about NATCEP reimbursement after reviewing this FAQ and other resources, they may contact the LTC Services Division at 517-241-4079.</p>