



STATE OF WASHINGTON  
DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
*Aging and Long-Term Support Administration*  
*PO Box 45600, Olympia, Washington 98504-5600*

February 28, 2025

AL TSA: NH #2025-006

**RESCINDING THE TEMPORARY PROCESS FOR VERIFICATION OF NURSING ASSISTANT-REGISTERED (NAR) ELIGIBILITY TO CONTINUE WORKING PAST 120 DAYS IN A NURSING HOME (NH)**

Dear Nursing Facility/Home Administrator:

This letter is to inform you that the temporary process for verification of NAR eligibility beyond four months (120 days) in NHs **will end March 1, 2025**. This supersedes the guidance in **AL TSA: NH #2024-011**.

**Background:**

The Code of Federal Regulations (CFR) 483.35(d) (1-3) mandates that NH NARs complete a training and competency evaluation program or compensate evaluation program. During the public health emergency (PHE), this requirement was temporarily suspended due to the federal 1135 waiver which remained in effect until May 11, 2023.

On March 15, 2024, Residential Care Services (RCS) implemented a temporary process to address the Department of Health (DOH) backlog of NAR certifications, while determining compliance with federal requirements in [CFR 483.35\(d\)\(1-3\)](#). This process, which was detailed in **AL TSA NH #2024-011**, allowed NH NAR staff to work for more than four (4) months while awaiting their DOH certification when all training and testing requirements were successfully completed. The temporary process was later extended, and further clarification was provided in a revised version of **AL TSA NH #2024**, which was republished on July 25, 2024.

**The temporary process for NAR verification between March 15, 2024, and February 28, 2025, was as follows:**

This allowance permits NARs to continue to work in NH beyond four months (120 days), when they can provide evidence of the following:

- 1. Successful completion of training** - Acceptable documentation includes:
  - A certificate of completion from an approved nursing assistant training program; **or**
  - Authorization to test from DOH-Credentialing or the Washington State Board of Nursing (WABON)
- 2. Successful completion of competency evaluation (state test)** – Acceptable documentation includes:
  - Passing skills test score sheet emailed from WABON; **and**
  - Passing online written test score sheet from Credentia
- 3. Completion of the Certification Application Attestation Form ([DSHS Attestation Form](#))** – Acceptable documentation includes:
  - Signed and dated [DSHS Attestation Form](#)

**What Has Changed:**

**Effective March 1, 2025**, the temporary guidance for verification of NAR eligibility will conclude as the DOH NAR credentialing backlog has been resolved. State training and testing still had to be completed

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during the past year as NARs had to complete the training and the testing within the 4-month (120-day) period. Given that the standard process did not change, there is no reason for reinstatement.

On November 8, 2024, DOH issued an additional letter to long-term care providers (see attachments). This letter acknowledged a significant reduction in the backlog of NAR credentialing, resulting in faster processing times. It also noted that the credentialing team had successfully managed the pending online NAR applications and expected to resolve the backlog of paper applications by February 2025.

Please follow the guidelines below:

**The NAR will:**

- **If hired on or after March 1, 2025:**
  - Complete the required training and testing within 120 days of their hire date.
  - NARs are no longer allowed work in the NAR role if they have not completed the required training and testing within the 120-day period.

**The NH will:**

- **For NARs impacted by the certification backlog:**
  - Ensure required documentation of NAR staff hired during the NAR certification backlog is maintained in the employee's personnel file and includes:
    - The signed and dated [Nursing Assistant Registered \(NAR\) Certification Application Attestation Form](#) verifying:
      1. Evidence of successful completion of training;
      2. Evidence of successful completion of the competency evaluation (state test); **and**
      3. Submission of certification application along with the required fee.
  - Any other relevant documentation that reflects communication between the NAR and facility regarding status of the NARs certification during this timeframe.
- **For NARs hired on or after March 1, 2025:**
  - Ensure the NAR candidate is not working in the NAR role if they have failed to successfully complete the required training and testing prior to the 120<sup>th</sup> day of employment.

**RCS Surveyors will:**

- **For NARs impacted by the certification backlog:**
  - Follow the temporary guidance issued during March 15, 2024, to February 28, 2025, for assessing and verifying NAR eligibility during survey and complaint investigations and ensure the following required documentation is included in the NARs personnel file:
    - The signed and dated [Nursing Assistant Registered \(NAR\) Certification Application Attestation Form](#) verifying:
      1. Evidence of successful completion of training;
      2. Evidence of successful completion of the competency evaluation (state test); **and**
      3. Submission of certification application along with the required fee.
  - Any other relevant documentation that reflects communication between the NAR and facility regarding status of the NARs certification during this timeframe.

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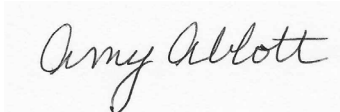
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- **For NARs hired on or after March 1, 2025:**
  - Revert to the standard process for assessing and verifying NAR eligibility during survey and complaint investigations when:
    - Conducting the Sufficient and Competent Nurse Staffing Review (Form CMS-20062); **and**
    - Conducting the Staff Qualification and Background Review (DSHS 10-631).

If you have any questions, please contact [Tiffany Meyers](#), Policy Program Manager, RCS at (360) 464-0373 or [Anne Richter](#), Nursing Assistant Training and Competency Evaluation Program Manager/OBRA Registry Manager, RCS at (360) 725-2596.

Thank you for your continued commitment to resident health and safety.

Sincerely,



Amy Abbott, Director  
Residential Care Services

DSHS: *"Partnering with People"*

*Attachments:* [DOH Dear Provider/Administrator Letter 11.08.2024](#)

Related References: [42 CFR 483.35\(d\)](#)  
[CMS-20062](#)  
[DSHS 10-631](#)  
<https://fortress.wa.gov/doh/providercredentialsearch/>