State of California-Health and Human Services Agency

California Department of Public Health (CDPH)
Licensing and Certification Program (L&C)
Aide and Technician Certification Section (ATCS)
eLearning Review Unit (ELRU)
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Online Nurse Assistant Training Program Sample Policies and Procedures

Please submit completed form to the eLearning Review Unit at **eLearning@cdph.ca.gov**

In an effort to assist training program applicants, the Department has prepared the following template, which is comprised of the five minimally required policies per Title 22 of the California Code of Regulations §71828 plus confirmations of knowledge and adherence to regulatory requirements in the form of attestations A-H.

- An applicant may choose to develop and submit their own policy and procedure manual as part of their application for an online Nurse Assistant Training Program (NATP), or they may adopt and submit this template after filling in the blanks and signing policies numbered one through five and attestations A-H at the bottom of each page.
- This sample includes a Skilled Nursing Facility (SNF) specific attestation G, which is ONLY to be completed by SNF/ICF owned/operated online NATP applicants. All other applicants should disregard attestation G.
- Items in [ ] have been added to clarify the referenced regulation.
- The job descriptions and organizational chart required per regulation 22 CCR §71828(b), as well as the instructor monitoring tool are not included in this template. The applicant must develop these documents, include them in the submission package and incorporate them into the policy and procedure manual.
- Once approved, each training program is encouraged to expand the policy and procedure manual to reflect the rules of their organization as they have determined.
- Please note that the Department survey will include a review of the provider's adherence to their own policies and procedures. The NATP is required to follow all policies adopted and/or written by the provider.

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Administrative Policies and Procedures

Per 22 CCR §71828 (a)(b)(1)(2)(3)(4)(5), each online NATP is required to develop and implement written administrative and management policies to govern the training program and instructors. Such policies shall be reviewed annually and revised as often as the provider determines necessary. A copy of the written policies shall be made available upon request to the Department.

Policies shall include but not be limited to:

1. Job descriptions detailing qualifications, duties, responsibilities, and limitations for the licensed nurse Program Director (RN) and the instructors.
2. An organizational chart showing the person in charge of the program, the lines of authority, responsibility, communication, staff assignments, and schedules.
3. The method of monitoring instructors by the individual responsible for the training program.
4. The ratio of students to instructor(s) for the clinical training, not to exceed a ratio of 15 students to 1 instructor.
5. How student absenteeism and makeup classes will be handled.

Policy #1

Topic: Staffing	Effective:
Title: **Job Descriptions**	Revised:
Regulatory references: **22 CCR §71828(b)(1)**	Reviewed:

Policy: The online NATP shall develop and maintain job descriptions detailing qualifications, duties, responsibilities, and limitations for the Registered Nurse Program Director (RNPD) and the instructors. 22 CCR §71828(b)(1).

Purpose: Job descriptions are important for successful operation of the NATP and provide structure to the organization. They set clear job expectations; support salary, promotion, and termination decisions; and provide guidelines regarding the supervision of employees.

Scope: All online NATP employees

Responsibilities:
The _____ is responsible for development of the job descriptions.
The _____ is responsible for monitoring the implementation of the job descriptions.
The _____ is responsible for reviewing and editing each job duty statement annually and as necessary.

Procedures:
- A job description for the Registered Nurse Program Director (RNPD) and the Director of Staff Development (DSD)/Instructor(s) will be developed by _____.

- Each job description will detail qualifications, duties, responsibilities, and limitations for a specific job title. 22 CCR §71828(b)(1)

- Job descriptions will be reviewed annually by _____ and edited as necessary when job duties change or evolve.

- This policy shall be reviewed annually and revised as often as the online NATP determines necessary. The policy will be reviewed by _____. 22 CCR §71828(a)

- Copies of the job descriptions are to be incorporated into the policy and procedure manual.

Policy #2

Topic: Staffing	Effective:
Title: **Organizational Chart**	Revised:
Regulatory references: **22 CCR §71828(b)(2)**	Reviewed:

Policy: The NATP shall develop and maintain an organizational chart showing the person in charge of the program, the lines of authority, responsibility, communication, staff assignments, and schedules. 22 CCR §71828(b)(2)

Purpose: The organizational chart is important as it shows the activities of the organization, provides information about different management levels, highlights subdivisions of the organization and identifies different types of work performed.

Scope: All online NATP employees

Responsibilities:
The _____ is responsible for the development of the organizational chart.
The _____ is responsible to monitor the implementation of the organizational chart.
The _____ is responsible to review and edit the organizational chart annually and as necessary.

Procedures:
- An organizational chart for the online NATP will be developed by _____.

- The organizational chart must include the person in charge, lines of authority, and include job titles.

- This policy shall be reviewed annually and revised as often as the online NATP determines necessary. The policy will be reviewed by _____.

- A copy of the organizational chart is to be incorporated into the policy and procedure manual. 22 CCR §71828(b)(2)

Training Program Name: _____ T

Policy #3

Topic: Program Monitoring	Effective:
Title: **Instructor Monitoring**	Revised:
Regulatory references: **22 CCR §71828(b)(3)**	Reviewed:

Policy: The online NATP shall monitor instructors. The monitoring will be completed by the RNPD responsible
   for the training program. 22 CCR §71828(b)(3)

Purpose: Monitoring of instructors ensures that ethical and regulatory compliant processes are followed.

Scope: All online NATP employees

Responsibilities:

The RNPD is responsible for the monitoring of NATP instructors.

Procedures:

- An instructor monitoring checklist will be developed by _____ and will
  be used to monitor each instructor. The checklist must include verification that the instructor is compliant
  with the online NATP policies and procedures and applicable State and Federal regulations.

- The RNPD will monitor each instructor at least once or more if necessary during the theory instruction and
  clinical skills training for each class or cohort.

- When completing instructor monitoring, the _____ will verify that there are no
  more than 15 students per instructor during clinical training.

- This policy shall be reviewed annually and revised as often as the online NATP determines necessary. The
  policy will be reviewed by _____. 22 CCR §71828(a)

Policy #4

Topic: Clinical Training	Effective:
Title: **Student to Instructor Ratio**	Revised:
Regulatory references: **22 CCR §71828(b)(4)**	Reviewed:

Policy: The ratio of students to instructor shall not exceed 15 students to 1 instructor during clinical training.

Purpose: Appropriate student ratios help to ensure that all students receive the required training for successful completion of the training program.

Scope: All online NATP employees

Responsibilities:

_____ is responsible for ensuring that the student to instructor ratio is adhered to during clinical training.

Procedures:

- At the time of enrollment, the _____ must verify that there will be no more than 15 students per instructor for all clinical training.

- If more than 15 students per instructor are enrolled for the theory portion of the course, the additional students will be required to enroll in the next clinical class or another Department approved instructor will be required to provide clinical training to the additional students.

- This policy shall be reviewed annually and revised as often as the online NATP determines necessary. The policy will be reviewed by _____. 22 CCR §71828(a)

Policy #5

Topic: Attendance	Effective:
Title: **Student Absenteeism and Make-Up**	Revised:
Regulatory references: **22 CCR §71828(b)(5)**	Reviewed:

Policy: In the case of student absences, the training program will provide an opportunity for make-up training to complete the program.

Purpose: To ensure that students receive all required classes following an absence and that make-up training classes are provided according to regulatory requirements, including the 16 hours of federally-mandated theory classes found in Modules 1-6, 12, and 14 prior to attending training.

Scope: All online NATP employees

Responsibilities:

The _____ is responsible to monitor student absences.

The _____ is responsible to ensure students complete the missed module/training prior to proceeding with the next module/training.

The RNPD is required to verify all missed training was completed according to the approved curriculum and training schedule in compliance with all State and Federal regulations.

Procedures:

- A student absence log will be developed by_____. The log must include the student name, date(s) and time(s) missed classes, the assignment(s) missed and specific information regarding the make-up classes. A copy of the student absence log shall be made available to the Department upon request. 22 CCR §71828(a)

- All makeup assignments must be completed following the Department approved lesson plans and must include the same content as the original assignment that was missed.

- Students may only proceed to clinical training after completing the 16 hours of federally mandated training per 42 CFR §483.152(b). This federal training is considered to be met when 16 hours of training is provided from Modules 1 through 6, 12, and 14.

- Prior to signing the CDPH 283B form for each student, the RNPD will verify that all hours, modules, components, assignments, skills demonstrations and exams were successfully completed.

- This policy shall be reviewed annually and revised as often as the online NATP determines necessary. The policy will be reviewed by _____. 22 CCR §71828(a)

Policy #6

Topic: Attendance	Effective: 3/23/2020
Title: **Make-Up/Remediation Plan**	Revised: 3/23/2020
Regulatory references: **22 CCR §71828(b)(5)**	Reviewed: 3/23/2020

Policy: In the case of student absences, students are not allowed to advance to the next training section of the program until remediation is in action.

Purpose: To ensure that students receive all required classes following an absence and that make-up training classes are provided according to regulatory requirements, including the 16 hours of federally-mandated theory classes found in Modules 1-6, 12, and 14 prior to attending training.

Scope: All online NATP employees

Responsibilities:

The PROGRAM INSTRUCTOR is responsible to record each lecture video at the start of the lecture.

The RN PROGRAM DIRECTOR is responsible to host the recorded lecture video onto the website.

The RN PROGRAM DIRECTOR is responsible to monitor absentee's proof of remediation.

The DEAN will ensure that hosted videos will not have any skip-forward feature during the playback.

Procedures:

- All lecture videos must be recorded by the PROGRAM INSTRUCTOR at the beginning of each lecture. All lecture videos are archived and hosted for the duration of the program and will be removed at the end of the program, by the RN PROGRAM DIRECTOR.

- Absentees will have to show proof of remediation to the RN PROGRAM DIRECTOR, by methods including but not limiting to a screenshot at the end of the hosted lecture video(s). The completed hosted lecture video(s) must be the same lecture(s) missed during the absence(s).

- Absentees who began the remediation after the program has ended will need to wait until the missed online lectures are live-streamed again in the next program rotation.

- This policy shall be reviewed annually and revised as often as the online NATP determines necessary. The policy will be reviewed by the DEAN. 22 CCR §71828(a)

Policy #7

Topic: Attendance	Effective: 3/23/2020
Title: **Online Attendance**	Revised: 3/23/2020
Regulatory references: **22 CCR §71828(b)(5)**	Reviewed: 3/23/2020

Policy: The PROGRAM INSTRUCTOR will monitor student's online participation and will retain proof of attendance at the end of every online lecture.

Purpose: To ensure that students follow strict attendance protocols throughout the entirety of this program.

Scope: All online NATP employees

Responsibilities:
The DEAN is responsible to develop and maintain an attendance tracker that can be integrated with Google Sheet to track the attendance of all students/participants in the online classroom provided by Google Meet.

The PROGRAM INSTRUCTOR is responsible to submit and retain proof of attendance of every theory lecture and clinical training.

The PROGRAM INSTRUCTOR is responsible to submit proof of attendance to the RN PROGRAM DIRECTOR at the end of each online theory lecture.

The PROGRAM INSTRUCTOR is responsible to submit all physical timesheets to the RN PROGRAM DIRECTOR at the end of clinical training.

The RN PROGRAM DIRECTOR is responsible to ensure all proof of attendance is available to the DEAN.

The DEAN is responsible to submit proof of attendance to State and Federal Regulators upon request.
HSC § 1337.16

Procedures:

- At the beginning of each lecture, the PROGRAM INSTRUCTOR is responsible to sign onto the online session 10 to 15 minutes before and remove any participants from the meeting room. The Google Meet room is only available to students during the assigned online session period for attendance purposes. Students are only allowed to enter the meeting room during actual class time and should be removed during breaks and or extended periods of inactivity.

- The PROGRAM INSTRUCTOR needs to obtain proof of online attendance by utilizing Google Admin's reporting feature which logs the online activity for each online meeting session. The report log is exported onto a Google Sheet, and with the exported data, the PROGRAM INSTRUCTOR needs to calculate the total duration for each participant throughout a lecture by methods including but not limited to utilizing the attendance tracker developed and maintained by the DEAN.

- The PROGRAM INSTRUCTOR will monitor student's online presence and participation by methods including but not limited to, utilizing a full grid view system of the online session. Doing so, the PROGRAM INSTRUCTOR will have proof of online presence of every participant during the online class meeting. If the student is not within view of his/her camera, the PROGRAM INSTRUCTOR will take note of the event, and further monitors the participant for the remainder of the online class session. If the student is not returned within 10 minutes of initial discovery, the PROGRAM INSTRUCTOR will remove the participant from the online session, and the participant can rejoin after his/her return from inactivity.

- The PROGRAM INSTRUCTOR will submit the proof of online theory attendance electronically via email, or a direct upload onto the Select Therapy Institute's designated Google Drive Storage.

- The PROGRAM INSTRUCTOR will submit all physical timesheets to the RN PROGRAM DIRECTOR at the end of clinical training.

- The RN PROGRAM DIRECTOR will monitor online lectures' proof of attendance weekly and ensure all physical timesheets of previous rotations are made available to the DEAN.

- The DEAN will submit proof of attendance in a readable fashion upon request to State and Federal Regulators. HSC § 1337.16

- This policy shall be reviewed annually and revised as often as the online NATP determines necessary. The policy will be reviewed by the DEAN. 22 CCR §71828(a)

Policy #8

Topic: Data Storage	Effective: 3/23/2020
Title: **bNATP Data Storage**	Revised: 3/23/2020
Regulatory references: **22 CCR §71828(b)(5)**	Reviewed: 3/23/2020

Policy: Each student's course related data must be safely stored via Online Cloud Storage after each rotation is complete. The data must be made available for State and Federal regulators.

HSC § 1337.16

Purpose: To ensure program data is securely stored and available upon request.

Scope: All online NATP employees

Responsibilities:
The RN PROGRAM DIRECTOR is responsible to export each program rotation's online data once the said program is complete; and safely store such data via Google Drive.

The RN PROGRAM DIRECTOR is responsible to scan each program rotation's physical files once the said program is complete; and safely upload the digital files onto Google Drive.

The DEAN is responsible to submit program data to State and Federal regulators upon request. The program data must be compiled in an organized and readable fashion. HSC § 1337.16

Procedures:

- The RN PROGRAM DIRECTOR will utilize Select Therapy Institute's online learning platform's export functionality to export the entire rotation's online program data including each student's module quiz and final exam performance.

- Once the online program data is exported, the RN PROGRAM DIRECTOR will upload the said data securely using Select Therapy Institute's dedicated Google Drive Storage.

- The RN PROGRAM DIRECTOR will scan each program rotation's physical files once the program rotation is complete. The RN PROGRAM DIRECTOR will also securely upload the digital files onto Select Therapy Institute's dedicated Google Drive Storage.

- Upon request by State or Federal Regulators, the DEAN will submit program data in a readable and organized fashion, in formats including PDF, Microsoft Excel Sheets and Google Sheet reference links.

  HSC § 1337.16

- All program files and data will be securely stored for a duration of four (4) years starting after the date of program completion.

- This policy shall be reviewed annually and revised as often as the online NATP determines necessary. The policy will be reviewed by the DEAN. 22 CCR §71828(a)

Policy #9

Topic: Rules to adhere to in an online classroom setting	Effective: 3/23/2020
Title: **Online Classroom Setting**	Revised: 3/23/2020
Regulatory references: **22 CCR §71828(b)(5)**	Reviewed: 3/23/2020

Policy: The DEAN will develop a set of policies to regulate an online classroom setting.

Purpose: To ensure that students follow strict protocols in an online classroom setting throughout the bNATP in regard to standards of behavior, attendance, make-up/remediation, hardware and software requirements.

Scope: All online NATP employees and students

Responsibilities:
The DEAN is responsible to develop and maintain policies specific to an online classroom setting for students enrolled in bNATP.

Procedures:

- The DEAN will develop and maintain a set of online classroom policies for all bNATP students to follow and adhere to throughout the entirety of their respective online training. The set of online classroom policies will reflect the bNATP operational policies as well as training requirements and encapsulate the student specific guidelines and protocols in an online classroom setting.

- This policy shall be reviewed annually and revised as often as the online NATP determines necessary. The policy will be reviewed by the DEAN. 22 CCR §71828(a)