



TO: District Superintendents  
Superintendents of Schools  
Public School Administrators  
Nonpublic School Administrators  
Charter School Administrators

From: Betty A. Rosa, Interim Commissioner

Date: August 28, 2020

Re: Updated Guidance on Clinical Hours Required for Secondary Nurse Aide Training, Home Health Aide Training, and Emergency Medical Technician Training Programs in Response to COVID-19

## **Background**

With the August 7, 2020 announcement by Governor Cuomo that schools are permitted to open in the fall, the Office of Career and Technical Education (CTE) has recently received an influx of questions from school districts and BOCES regarding their secondary Nurse Aide Training, Home Health Aide Training, and Emergency Medical Technician education programs. In order to address the possibility of limited clinical opportunities through school scheduling adjustments in response to the COVID-19 pandemic, the Office of CTE has put forth the following guidance with respect to these programs for the 2020-2021 academic year.

## **Recommendations for Approved CTE Programs in Secondary Schools**

### **Nurse Aide Training Programs**

NYSED-approved Nurse Aide Training Programs require a minimum of 108 clinical hours. Due to COVID-19 school scheduling adjustments, NYSED will now require all nurse aide trainees to complete a minimum of 30 hands-on clinical hours in a long-term care or skilled nursing facility consistent with the requirements to be eligible to sit for the NYS Department of Health Nurse Aide examination per Sections 1819e and 1919e (1) and (2) of the Federal (OBRA, PL 100-203) and Section 415 of Title 10 of the New York Code, Rules and Regulations (10 NYCRR). The remaining 78 clinical hours required by NYSED for program operation and approval may be delivered using an in-person, remote, or hybrid model, based on individual districts/schools/BOCES re-opening plans, and may be comprised of experiences that meet the curricular program requirements through required skill

performance, project-based learning, and experiences which are all taught and supervised by the registered professional nurse educator in these specific circumstances. As with all nurse aide training programs, professional discretion must be used when attesting that students are safely applying learned concepts as demonstrated by a completer of a nurse aide training program. All student instructional hours must be properly documented.

### **Home Health Aide Training Programs**

NYSED-approved Home Health Aide Training Programs require a minimum of 30 clinical hours. Due to COVID-19 school scheduling adjustments and NYS Department of Health's revised guidelines, NYSED will now require all home health aide trainees to complete 16 supervised clinical hours (including the 8 hands-on clinical hours) in a skills laboratory, under the direct supervision of an approved nurse instructor consistent with the NYS Department of Health requirements to be eligible for completion per Part 484 of Title 42 of the Code of Federal Regulations (42 CFR) and Section 700.2 of Title 10 of the New York Code, Rules and Regulations (10 NYCRR). The remaining 14 clinical hours required by NYSED for program approval may be delivered using an in-person, remote, or hybrid model, based on individual districts/schools/BOCES re-opening plans, and may be comprised of experiences that meet the curricular program requirements through required skill performance, project-based learning, and experiences which are all taught and supervised by the registered professional nurse educator in these specific circumstances. As with all home health aide training programs, professional discretion must be used when attesting that students are safely applying learned concepts as demonstrated by a completer of a home health aide training program. All student instructional hours must be properly documented.

### **Emergency Medical Technician Training Programs**

NYSED-approved Emergency Medical Technician Training Programs require a minimum of 10 clinical hours. There have been no changes to this requirement. All emergency medical technician trainees must complete 10 hours of clinical rotation which could be done either with a NYS certified ambulance service or at a hospital's Emergency Department, or a combination of both consistent with NYS Public Health Law 30-A, 3052. This is required in order to be eligible to take the NYS Department of Health EMT certification exam.

### **Technical Assessment Flexibility:**

Without the required minimum hands-on clinical hours, students completing the approved Nurse Aide Training Programs will be ineligible to sit for the culminating Prometric assessment per the Department of Health. Some students may still wish to enroll in such

programs with the intent to complete their clinical hours and be eligible for the examination in the future. In an effort to provide high school seniors in the 2020-21 school year the opportunity to utilize the Nurse Aide Training Program for the 4+1 graduation pathway as well as receive the CTE endorsement on their diplomas, NYSED will allow those programs unable to meet the required minimum hands-on clinical hours to utilize an alternate technical assessment other than the Prometric assessment in the 2020-21 school year. These programs must submit a program amendment identifying the new technical assessment no later than January 31, 2021 to the Office of CTE for review. Any alternative assessment used for the 2020-21 school year is not a substitution for the regulatory requirement that all students completing a New York State Nurse Aide Training Program must take and pass the Prometric Certified Nursing Assistant Exam in order to work as a Certified Nursing Assistant in the state of New York.

### **Notification Requirements**

If programs plan to suspend hands-on clinical hours or anticipate required hands-on clinical hours will not be met by the end of the academic year, notification must be given immediately to component districts, students, and their families. Such notification shall clearly indicate that students who choose to complete the program while still eligible for the 4+1 CTE pathway and the technical endorsement will not be eligible to sit for the certification exam required to work as a Certified Nurse Aid in the State of New York.

Questions about the above flexibilities to program requirements can be directed to the office of Career and Technical Education at [emsccte@nysed.gov](mailto:emsccte@nysed.gov) .