National Nurse Aide Registry – Results of State Survey

A request to participate in a National Nurse Aide Registry (NNAR) survey was sent in January of 2017 to the following participants in the National Background Check Program (NBCP) sponsored by the Centers for Medicare and Medicaid Services: Alaska, Washington DC, Georgia, New Mexico, Utah, West Virginia, Oregon, Florida, Ohio, Oklahoma, Nevada, Connecticut, California, North Carolina, Rhode Island, Kentucky, Minnesota, Michigan, Missouri, Maine, Kansas, Hawaii, Delaware, Illinois, and Maryland.
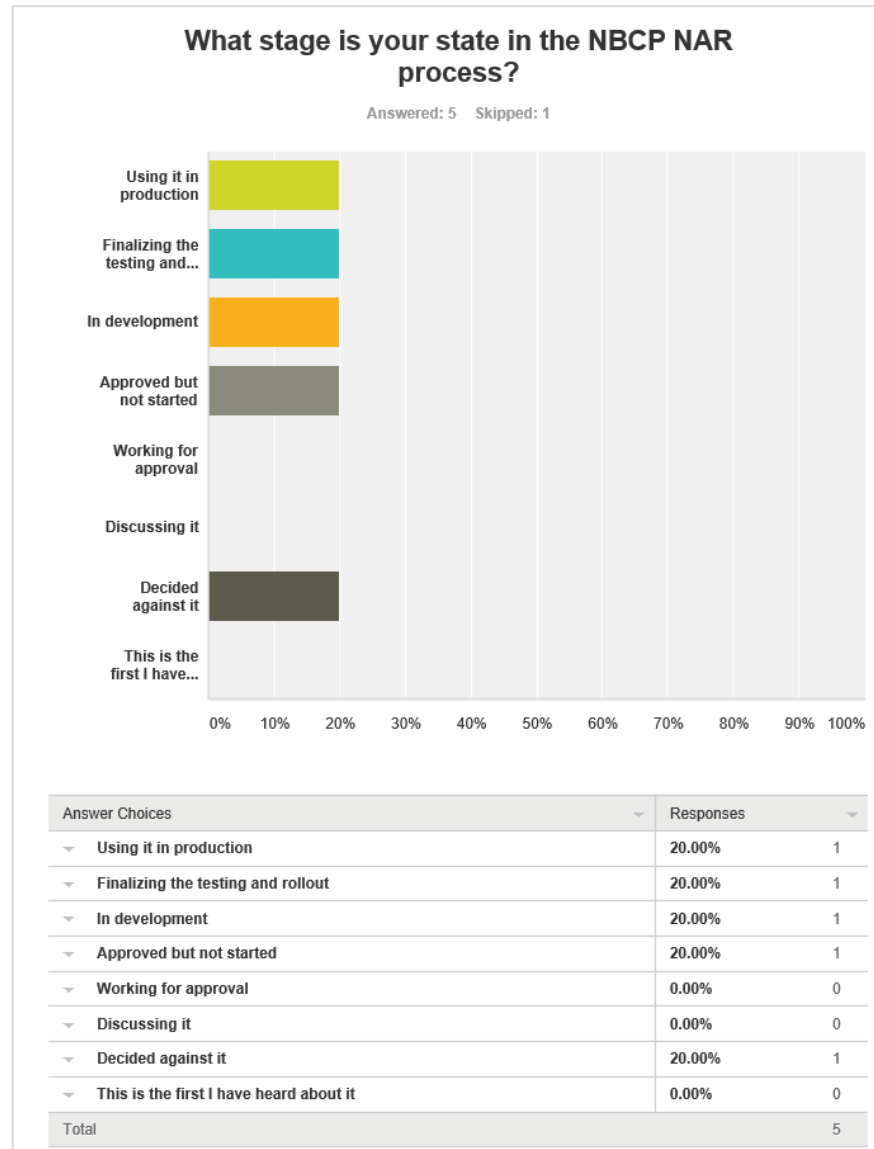
The survey sought to capture the status of state participation in a National Nurse Aide Registry. This registry will operate through a common web service interface to state registries that provides results to participating states' screening software. Of the 25 NBCP states polled, 12 responded. Of respondents, two states were participating at the time of the survey (DC, WV), six states were in development (CA, FL, NV, OH, OK, OR) and two states expressed intent to participate (HI and KS). UT and NM were also participating when the survey was sent, even though they did not respond.

The most common barrier to adoption was security. The methodology employed for system to system registry queries is not unique to the NNAR and NBCP states would benefit from access to education on developments and methods to protect against unauthorized disclosures. As noted by Ohio, CNA provided a document that explained the program and addressed the technical and security issues. A teleconference to discuss the national nurse aide registry and provide everyone an opportunity to ask questions and get answers was provided and through this process concerns were overcome and Ohio was able to move forward.

Below is a summary of the responses of the states that participated.
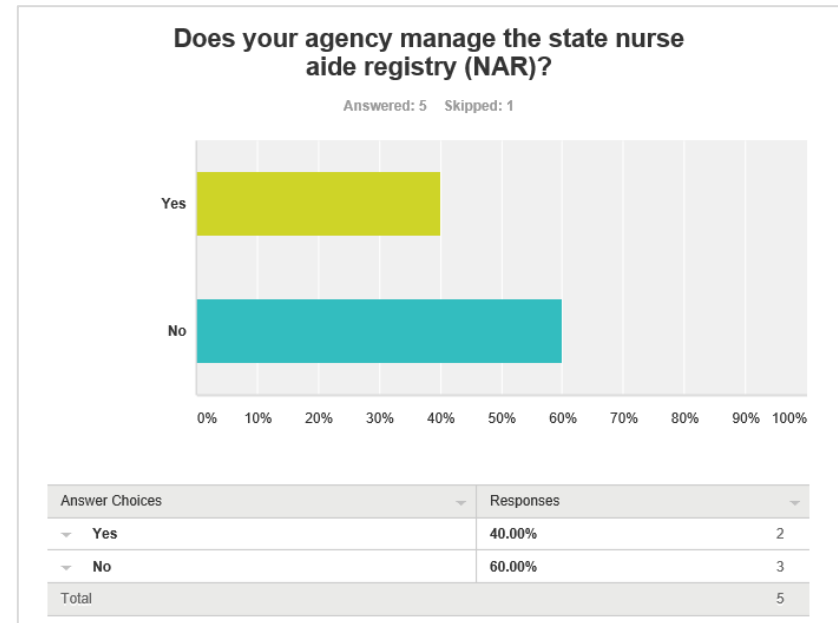
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Q1: What stage is your state in the NBCP NAR process?

- **Nevada** – In development – We are working with NAR agency on web services to Core System, specifically obtaining the correct field we need to show the CNA had a substantiated finding.
- **Ohio** – Finalizing the testing and rollout
- **Michigan** – Decided against it
- **Oregon** – Finalizing the testing and rollout
- **Oklahoma** – Approved but not started
- **West Virginia** – Using it in production
- **California** – In development
- **Florida** – Finalizing the testing and rollout
- **DC** – In production
- **Kentucky** – Decided against it (Agency responsible for NAR does not want to build a web service or make data available – note from spreadsheet)
- **Hawaii** – Open to idea in March 2017 – from spreadsheet)
- **Kansas** – Is currently developing their core system and plans on implementing NBCP NAR as part of the core development process.

What stage is your state in the NBCP NAR process?

Answered: 5   Skipped: 1

Answer Choices		Responses	
Using it in production		20.00%	1
Finalizing the testing and rollout		20.00%	1
In development		20.00%	1
Approved but not started		20.00%	1
Working for approval		0.00%	0
Discussing it		0.00%	0
Decided against it		20.00%	1
This is the first I have heard about it		0.00%	0
Total			5

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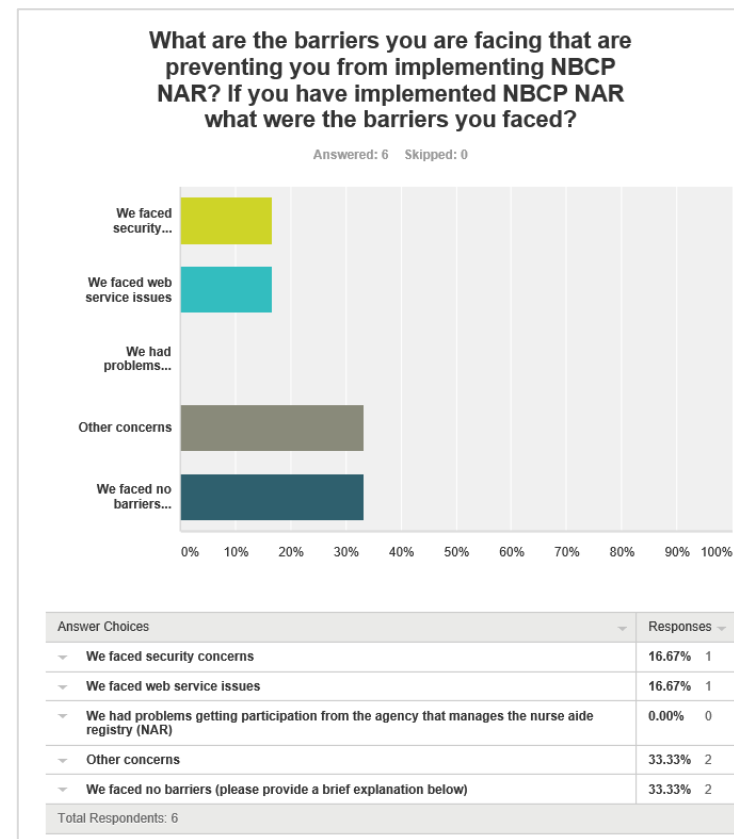**Q2: Does your agency manage the state nurse aide registry (NAR)?**

- **Nevada** – No
- **Michigan** – Michigan decided to delay participation in the NAR for the time being. One reason is that Michigan had a deliverable under its current CMS background check program for regional cooperation with contiguous States.
- **Oregon** – No
- **Oklahoma** – Yes
- **West Virginia** – No
- **California** – Yes
- **Florida** – No
- **DC** – Yes (BON)

Does your agency manage the state nurse aide registry (NAR)?

Answered: 5   Skipped: 1

Answer Choices	Responses	
Yes	40.00%	2
No	60.00%	3
Total		5

Q3: What are the barriers you are facing that are preventing you from implementing NBCP NAR? If you have implemented NBCP NAR what were the barriers you faced?
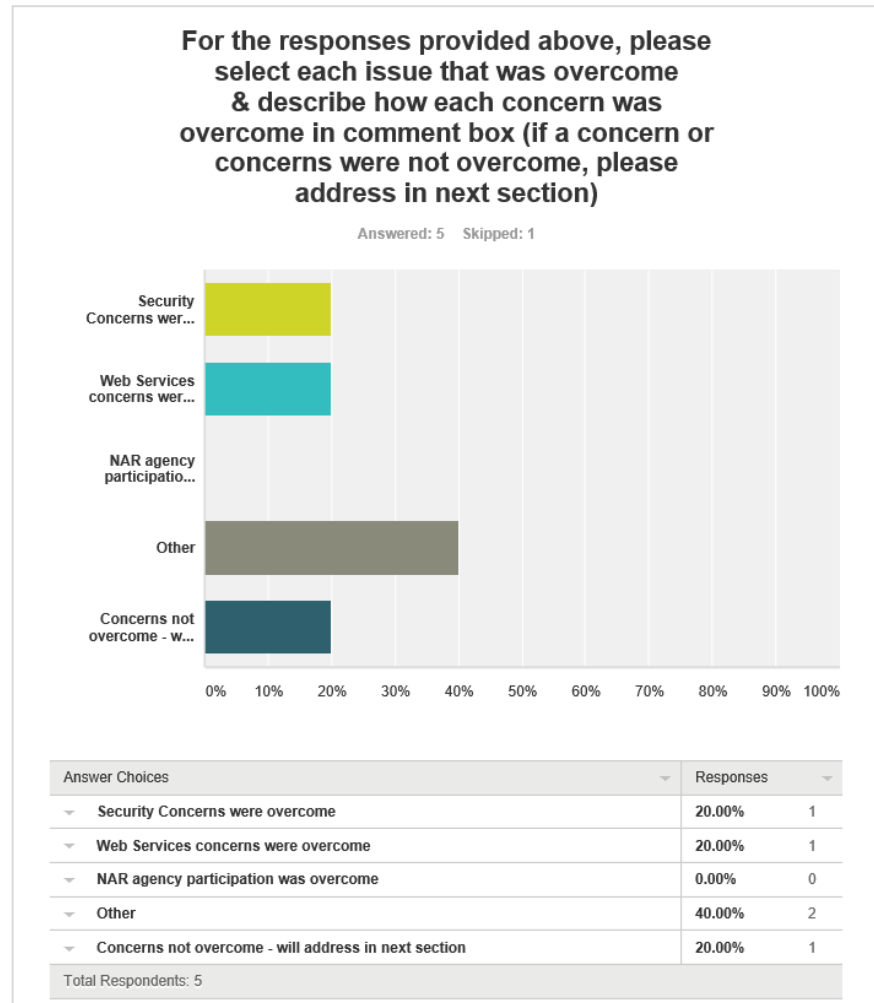
- **Nevada** – We faced web service issues – The NAR agency was having some major development work completed to the system which delayed us in moving forward. We have successfully worked through those issues and now need to get the correct field to display.
- **Ohio** – We faced security concerns – The Ohio Dept. of Health, which is the owner of Ohio's Nurse Aide Registry, initially was concerned about the security of the information. They also wanted reassurance that the user signed an official End User License Agreement.
- **Michigan** – Other concerns – Michigan decided to delay participation in the NAR for the time being, as it had other priorities. See number 5 above, as well as time commitment for other projects affecting its background check system, including the addition of an interface for child care requirements (CCDF).
- **Oregon** – We faced no barriers (please provide a brief explanation below) – Everyone was on board and the Board of Nursing both saw and agreed with the benefits of a NNAR
- **Oklahoma** – Other concerns – In house technical support delays.

- **West Virginia** – We faced no barriers (please provide a brief explanation below) – We approached the agency that manages the registry and they presented no barrier or concerns.
- **California** – We faced some security issues.
- **Florida** – We faced security concerns.
- **DC** – None

What are the barriers you are facing that are preventing you from implementing NBCP NAR? If you have implemented NBCP NAR what were the barriers you faced?

Answered: 6   Skipped: 0

Answer Choices	Responses	
We faced security concerns	16.67%	1
We faced web service issues	16.67%	1
We had problems getting participation from the agency that manages the nurse aide registry (NAR)	0.00%	0
Other concerns	33.33%	2
We faced no barriers (please provide a brief explanation below)	33.33%	2
Total Respondents: 6		

Q4: For the responses provided above, please select each issue that was overcome & describe how each concern was overcome in comment box (if a concern or concerns were not overcome, please address in next section)

- **Nevada** – Web Services concerns were overcome – We are working on overcoming this barrier. The main issues have been overcome by working closely with the Core developers and the NAR agency. We have one main step left as noted previously to help complete this step.
- **Ohio** – Security Concerns were overcome – Innovative Architects provided a document that explained the program and addressed the technical issues. We also scheduled a teleconference to discuss the national nurse aide registry and provide everyone an opportunity to ask questions and get answers.
- **Michigan** – Other – Non–participation at this time is based on resource allocation.
- **Oregon** – Concerns not overcome – will address in next section
- **West Virginia** – Other – None
- **California** – Security concerns were overcome.
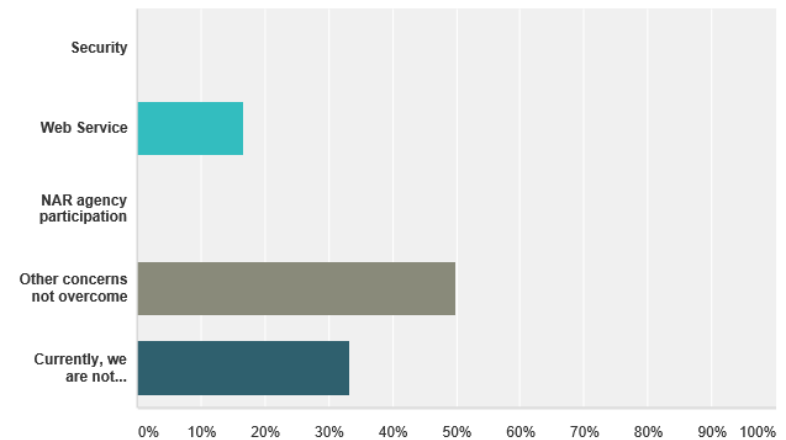- **Florida** – Security concerns were overcome.
- **DC** – None

For the responses provided above, please select each issue that was overcome & describe how each concern was overcome in comment box (if a concern or concerns were not overcome, please address in next section)

Answered: 5   Skipped: 1

Answer Choices		Responses	
▼	Security Concerns were overcome	20.00%	1
▼	Web Services concerns were overcome	20.00%	1
▼	NAR agency participation was overcome	0.00%	0
▼	Other	40.00%	2
▼	Concerns not overcome - will address in next section	20.00%	1
Total Respondents: 5			

Q5: If currently experiencing concerns that have not been overcome, what is the plan to help overcome those concerns? Please select concerns not overcome & provide plan to overcome concerns in comment box below.

- **Nevada** – Web Service – As noted previously, we are working through this and anticipate this being completed within the next month.
- **Ohio** – Currently, we are not experiencing any concerns that have to be overcome.
- **Michigan** – Other concerns not overcome – Awaiting outcome of NAR pilot project and possible regulatory actions by CMS, including a mandate in CFR.
- **Oregon** – Other concerns not overcome – We have not yet implemented due to staffing and criteria. We do not have staffing yet to cover the workload of additional "hits," nor have we approved the criteria for "hits" from the NNAR.
- **Oklahoma** – Other concerns not overcome – We have asked IA to rollout the enhancement and are hoping that will push our IT to complete a server upgrade based on diminishing timeline of IA support.
- **West Virginia** – Currently, we are not experiencing any concerns that have to be overcome
- **Florida** – Currently, we are not experiencing any concerns that have to be overcome.
- **DC** – None

If currently experiencing concerns that have not been overcome, what is the plan to help overcome those concerns? Please select concerns not overcome & provide plan to overcome concerns in comment box below.

Answered: 6   Skipped: 0

Answer Choices	Responses	
Security	0.00%	0
Web Service	16.67%	1
NAR agency participation	0.00%	0
Other concerns not overcome	50.00%	3
Currently, we are not experiencing any concerns that have to be overcome	33.33%	2
Total		6

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Q6: Is there any assistance the National Forum for Background Check Program can provide to help overcome the barriers? If yes, please explain in comment box below.

- **Nevada** – No
- **Ohio** – No – Ohio is ready to go live as part of the NBCP NAR in about two weeks. We are in the next group that includes OH, OK, OR, WV, and FL. A total of nine states/territories' nurse aide registries will be checked once we go live.
- **Michigan** – Yes – Provide updates on experience from other States and issues.
- **Oregon** – No
- **Oklahoma** – No
- **West Virginia** – No
- **California** – No
- **Florida** – No

Is there any assistance the National Forum for Background Check Program can provide to help overcome the barriers? If yes, please explain in comment box below.

Answered: 6   Skipped: 0

Answer Choices	Responses	
Yes	16.67%	1
No	83.33%	5
Total		6

July 31, 2017