



RON DESANTIS  
GOVERNOR

MARY C. MAYHEW  
SECRETARY

March 28, 2020

Emmett Reed  
Executive Director  
Florida Health Care Association  
307 West Park Avenue  
Tallahassee, FL 32301

Steve Bahmer  
President and CEO  
Florida LeadingAge  
1812 Riggins Road  
Tallahassee, FL 32308

Dear Mr. Reed and Mr. Bahmer,

Thank you for your letter concerning the certification allowing a personal care attendant to perform resident care procedures currently delivered by certified nursing assistants. We appreciate your willingness to help while we work to address workforce shortages.

Section 400.211, Florida Statutes, states:

(1) To serve as a nursing assistant in any nursing home, a person must be certified as a nursing assistant under part II of chapter 464, unless the person is a registered nurse or practical nurse licensed in accordance with part I of chapter 464 or an applicant for such licensure who is permitted to practice nursing in accordance with rules adopted by the Board of Nursing pursuant to part I of chapter 464.

(2) The following categories of persons who are not certified as nursing assistants under part II of chapter 464 may be employed by a nursing facility for a period of 4 months:

(a) Persons who are enrolled in, or have completed, a state-approved nursing assistant program;

Based on the Agency's review of the proposal and our discussions about implementation, the Agency temporarily approves this program effective March 28, 2020 through May 1, 2020, or until such time the Agency finds it necessary to extend or discontinue the program to meet the needs of this crisis.

Sincerely,

Molly McKinstry  
Deputy Secretary



March 26, 2020

Molly McKinstry  
Deputy Secretary  
Agency for Health Care Administration  
2727 Mahan Dr  
Tallahassee, FL 32308

Dear Ms. McKinstry:

Please find FHCA's updated proposal to temporarily allow a Personal Care Attendant to perform resident care procedures currently delivered by a Certified Nursing Assistant. The enclosed proposal is revised to reflect current Florida Law. As we previously shared, this program has been successfully implemented by the state of Indiana and not only helps expand our current long term care workforce, but also offers a solution to support the many Floridians who are currently out of work due to business closures across the state. We have vetted this program among FHCA's Senior Clinicians Council and many of our nursing home companies, and these providers are able and willing to start these training programs immediately should the Agency for Health Care Administration grant a waiver for them to implement this program.

Florida's skilled nursing center shortages have been exacerbated due the COVID-19 outbreak: school closures have caused significant childcare issues; workers are being quarantined due to travel and exposure; and staff responsibilities have been expanded resulting from required visitor screenings and restrictions on communal dining and group activities. We have only begun to see the impact of the COVID-19 outbreak across our state, and it is likely the staffing challenges will significantly increase over the next few weeks. The situation could become even more dire should a facility be impacted by a positive COVID-19 case and surrounding staff are required to follow the self-isolation protocols. The ability to staff at the level of care residents require could be put at risk.

As always, our goal is to continue meeting the care needs of our residents, keeping them safe from this virus and giving our caregivers currently on the front lines the added support they need to do both.

Please contact me at [ereed@fhca.org](mailto:ereed@fhca.org) or 850-224-3907 if you have any questions about this proposal.

Sincerely,



Emmett Reed  
Executive Director

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*Representing the Florida Long Term Care Community*

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**Temporary COVID-19 Personal Care Attendant  
Eight (8) Hour Preservice Course  
5-Hour Classroom & 3-Hour Simulation/Competency Check-Off  
with Continued On-the-Job Training**

**Overview**

This program permits a skilled facility (Chapter 400, FS) to employ a trained Personal Care Attendant (PCA) to assist direct care staff with resident's activities of daily living in accordance with their training. The resident care tasks allowed of a PCA are those defined as the competencies trained in the preservice 8-hour course. This program will enable the PCA to further obtain skills and training toward the goal of successfully passing the CNA exam and moving into a career as a Certified Nursing Assistant (CNA).

The goal is to provide nursing homes with additional staff to care for residents during the period of the State of Emergency and to train new workers to obtain the skills necessary to become a CNA. The Personal Care Attendant program is established under section 400.211 (2)(a) Florida Statutes addressing "persons who are enrolled in or have completed a state-approved nursing assistant program" to be "employed by a nursing facility for a period of 4 months."

**Scope**

The PCA position is a temporary accommodation made by the State of Florida to address work increases and staffing shortages caused by the 2020 COVID-19 pandemic. The position and its attendant training are implementations by the Agency for Health Care Administration (AHCA) for the purposes and directives of Governor Ron DeSantis on March 1, 2020, "Declaration of Public Health Emergency for Coronavirus Disease 2019 Outbreak" (Executive Order). The PCA position will be authorized from March 28 through May 1, 2020, or until such time the Agency for Health Care Administration finds it necessary to extend or discontinue the program to meet the needs of the crisis.

**Personal Requirements**

A candidate for training must be at least eighteen (18) years of age. There are no minimum educational requirements.

**Training Standards**

Completion of all training and documentation requirements for PCA candidates is the ultimate responsibility of the training/hiring facility.

The PCA training course must be taught by an RN.

Training must consist of five (5) hours of classroom teaching and three (3) hours of supervised simulation in which the PCA candidate exhibits competency in all areas of training.

PCA program must be developed using applicable portions of the Nurse Aide Curriculum. The curriculum may be supplemented with additional resources relevant to current industry concerns and regulatory directives or guidance concerning COVID-19.

Upon the completion of instruction, PCA candidates must simulate and demonstrate competency in all required care procedures.

Under observation by the instructor, PCA candidates will first simulate procedures while working together in pairs or teams. Next, the instructor (or the instructor with the assistance of a licensed nurse) must observe each candidate's simulation of required skills and document the candidate's competency.

Upon completion of the eight (8) hour course, the facility will maintain a record of all PCA candidates who complete training and demonstrate required competencies to AHCA. When requested by AHCA, the facility will provide the names of all PCAs working in the facility at the time of the request.

The facility must fully notify its certified and licensed staff members that PCAs have a limited scope of permissible work, and detail what duties may not be delegated to PCAs. If the facility learns that any PCA is performing duties outside the limited scope of permissible work, it must immediately intervene, stop the PCA, and reassign those duties to authorized personnel.

PCAs shall report to the facility's Charge Nurse/Manager on Duty.

## **Required Areas of Instruction/Competency**

### **I. Resident Rights/HIPAA/Abuse & Neglect (15 minutes)**

- A. Response to a witnessed (or reported) breach
- B. Immediate reporting of Abuse and Neglect to Nurse/Manager on Duty

### **II. Infection Control (30 minutes)**

- A. How infection is spread (chain of infection/modes of transmission)
  - 1. COVID-19 and facility policy for screening
- B. Hand Hygiene (Handwashing, ABHR, Cough Etiquette)
- C. Standard Precautions/Personal Protective Equipment
- D. Handling of clean and soiled linens
- E. Disinfection of common use articles/equipment/high touch objects/areas

*Note: The PCA will not be assigned or provide care or services to a resident in Isolation Precautions.*

### **III. Emergency Procedures (15 minutes)**

- A. What to do when a Resident is found on the floor
- B. Choking: Heimlich Maneuver

### **IV. Activities of Daily Living (120 minutes)**

- A. Initial Steps/Responding to a call light
- B. Obtaining a temperature (all routes other than rectal), reporting/documentation
- C. Making an unoccupied bed/handling of linens
- D. Turning and repositioning the Resident while in bed
- E. Making an occupied bed
- F. Transfer from bed to chair/wheelchair/Use of Gait belt- One person standby/transfer
- G. Assistance with Dressing/Undressing
- H. Incontinence/Perineal Care
- I. Assist to Toilet/Use of urinal (only for a resident requiring one person/standby assistance)
- J. Oral Care - conscious residents only
- K. Devices/Use/Storage
  - 1. Hearing Aids
  - 2. Eyeglasses
  - 3. Dentures

*Note: Emphasis on orthotics and prosthetics must be placed by a certified nursing assistant.*

- L. Final Steps/Observations to report to the Nurse

**V. Skin Care/Pressure Prevention (15 minutes)**

- A. Basic care/interventions/devices
- B. Offloading/floating heels
- C. Observations to report to the Nurse/Manager on Duty
  - 4. Open area or skin condition observed to be lacking a dressing
    - a. Emphasis on no dressing applied by the Personal Care Attendant
  - 5. Observed bruises, abrasions or skin tears

**VI. Oxygen Use/Safety (15 minutes)**

- A. Nasal cannula/tubing/storage/observing liter flow
- B. Potential hazards/safety

**VII. Nutrition/Hydration (15 minutes)**

- A. Mechanically Altered Diets/Thickened Liquids/Adherence to Diet
- B. Passing Trays/Retrieving Trays (set up/opening packages for residents who can consume meals independently)
- C. Passing ice water
- D. Food storage/safety

**VIII. Dementia Care (30 minutes)**

- A. Stages of Dementia/Overview
- B. Tips on communicating with cognitively impaired Residents
- C. Recognition of when to seek additional staff assistance

**IX. Mental Health/Challenging Behaviors (30 minutes)**

- A. Responding to a challenging behavior
- B. Recognition of when to seek additional staff assistance
- C. Reporting a challenging behavior to Nurse/Manager on duty

**X. Review of Resident Rights, Abuse & Neglect Reporting, and Reporting to the Nurse (15 minutes)**

- A. Sample scenarios of situations involving Resident Rights, abuse and neglect
- B. Review of immediate protection of Resident until assistance arrives, if abuse is in process
- C. Review of duty to immediately report to the Nurse/Manager on Duty

**Continued On-the-Job Training**

Upon completion of the initial 8-hour course, the Personal Care Attendant will work under the direct supervision of the nursing staff and in collaboration with the Certified Nursing Assistants providing ADL services to the residents. During this on-the-job training period, facilities will work with the Personal Care Attendant to further improve and expand his/her resident care skills. Facilities are further encouraged to provide continued educational training so that those Personal Care Attendants who seek a career as a Certified Nursing Assistant rise to the competency level in which they can become a Certified Nursing Assistant.