

9.C.2 Consideration of AFL/CIO Application as an Eligible Training Provider for Nurse Aide Training – (Action)

Department of Workforce Development (DWD) regulations require that each local WDB review eligible training provider (ETP) applications for all parties interested in providing training services within a WDA. The criterion for approving ETP applications is specified in the DWD/DWS Workforce Programs Guide, Part 2 – Workforce Investment Act (WIA) Program Guide, Section I.2.E.2. According to this regulation, among other criteria, the local WDB must verify that the training provider's program "performance information for the most recent 12-month period." A training vendor who meets all required criteria must be included on the local list.

In the Spring, the AFL/CIO submitted an application for a 96-hour Nurse Aide Training Program. Following SWWDB procedures, the application was distributed to Board members for comment. The application and comments were then considered by the Program Operations Committee (POC) at the May 23, 2006 meeting.

While several issues were expressed, the biggest concern centered on whether someone who participated in the training would be able to continue his/her education and have the credits transfer to one of the technical colleges. It was also noted that CNA does not meet the \$12.93 per hour definition of a high wage job but could be considered under the career laddering provisions being promoted by DWD. The program also does not have "demonstrated performance" for a 12-month period and, therefore, does not meet the minimum DWD criteria. It was the staff recommendation to disapprove the program.

However, POC members discussed the high demand for CNAs and thought the AFL/CIO should be able to reapply once it could obtain more information to answer POC questions about the program. The POC approved a motion to deny the application **"at this time until further clarification of the program is known to us, and SWWDB would encourage a career laddering approach rather than what is presented."**

The AFL/CIO has requested reconsideration of the Nurse Aide Training Program. In preparing for reconsideration of this ETP application staff have learned the following:

- The AFL/CIO will not be providing the training. Bartz and Associates, L.L.C. will actually provide the training under a contract with the AFL/CIO. Therefore, the ETP application should be submitted by Bartz and Associates.
- The Wisconsin Department of Health and Family Services requires that, "All nurse aide training programs must be approved by the Bureau of Quality Assurance (BQA) before training can be provided. The Bartz and Associates program does not appear on the BQA list of approved nurse aide training programs and cannot provide written documentation that its program is approved by BQA.
- The Bartz and Associates proposal states their intent to develop a program that

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meets the Department of Health and Family Services, BQA requirements. Bartz and Associates, as an organization, has not operated this specific program anywhere else in Wisconsin. Ms. Bartz has taught 12 C.N.A. programs for Vi Moran Associates since 2001 but has not offered training under the name of Bartz and Associates.

- Bartz and Associates acknowledges that this is a new program and it cannot provide the mandatory 12-month “demonstrated performance” data for the program.
- AFL-CIO LETC has provided documentation from Blackhawk Technical College’s catalog of offerings which states that program admission into the Associate Degree Nursing Program requires a potential student be “Listed on Wisconsin Nurse Aide Registry with current eligibility status for employment in federally certified facilities or comparable equivalent.” Although no direct contact was made with BTC, a student included on the Nurse Aide Registry would be considered eligible to apply for Associate Degree Nursing Program.
- BTC offers several sections of its Certified Nursing Assistant (CNA) with start dates at various times throughout the year. During the 2004-05 year, 233 Nursing Assistants were trained. This addresses one of the major justifications for the Bartz and Associates program.

Based on the information provided above, it is the recommendation of administration that the AFL/CIO and Bartz and Associates not be approved as an eligible training provider for the Nurse Aide training program at this time. Once the program has been approved by the BQA, operated successfully for one year, and performance data has been collected demonstrating program success, then the AFL/CIO and Bartz and Associates should be allowed to reapply as an ETP for this program.