



# Washington State Auditor's Office

Government that works for citizens

## Performance Audit

### I-1163: Long-term Care Worker Certification Requirements 2016

August 4, 2016

We conducted a performance audit of Washington's voter-approved Initiative 1163. We found the Department of Social and Health Services and the Department of Health made several improvements since our last performance audit (published in December 2014); as a result, more people have become certified home care aides. However, completion rates remain at about the same level as our previous audit at 56 percent, suggesting that more work may need to be done to address any barriers to certification.



Report Number: 1017262

# Table of Contents

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Introduction .....	3
Background .....	4
Scope and Methodology .....	6
Audit Results .....	7
Recommendations.....	10
Agency Response .....	11
Appendix A: Initiative 900 .....	13

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# Introduction

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Initiative 1163, passed by voters in 2011, increased the required training, certification and criminal background checks needed to become a long-term care worker. It applies to home care aides who provide support and personal care to the elderly and adults with disabilities in their homes or in residential facilities. These aides help clients with eating, bathing, dressing and carrying out many activities of daily living. They may be employees of facilities or agencies or registered with the state as Individual Providers.

The initiative also requires the State Auditor's Office to conduct a performance audit of the long-term in-home care program every two years. Two state agencies are involved in administering the necessary training, background checks and certification requirements: the Department of Social and Health Services (DSHS) and the Department of Health (DOH).

## Previous audits showed many applicants did not complete the process

Our first audit, published in January 2013, examined the first four months of the program – January through April 2012 – and found that 71 percent of those who applied did not obtain a certificate.

In mid-2012, in response to our audit's findings, DSHS and DOH formed an executive workgroup to identify the barriers that hindered applicants as they attempted to meet certification requirements. The workgroup, composed of representatives from DSHS, DOH, the Training Partnership, Prometric (a private testing company), and other stakeholders, made several improvements.

Our second audit, published in December 2014, found that the improvements contributed to a higher certification rate but many applicants (42 percent) still did not complete the process.

## Audit objectives

The law mandating a performance audit does not specify what must be audited. We designed this audit to assess how successful the agencies' efforts to improve certification completion rates have been, and to determine whether they have implemented the recommendations made in the previous audit (see sidebar).

1. What progress have DOH and DSHS made in identifying barriers to certification?
2. Have the certification completion rates among home care aide applicants increased since the last audit?
3. Has DSHS implemented our recommendations regarding the monitoring of adult family homes?

This audit is the third in a series of audits required by I-1163. Earlier reports are on our website:

**I-1163: Long-Term Care Worker Certification Requirements**  
(December 2014)

**I-1163: Long-Term Care Worker Certification Requirements**  
(January 2013)

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## Recommendations made in the 2014 audit:

To ensure long-term care workers meet I-1163 requirements, we recommend:

- DOH and DSHS continue to work to identify barriers that are keeping workers from applying for, or not completing, the certification process.

We recommend DSHS:

- Send a written notification to all adult family home providers reminding them of their responsibility to ensure their workers meet I-1163 requirements. The letter should also reiterate that the Nursing Assistant-Registered certificate does not satisfy I-1163 requirements.
  - Immediately follow-up on the one caregiver who is still employed as a long-term care worker and has not obtained the required certification.
  - During the next inspection, review the qualifications of all caregivers in the homes that employed the other nine uncertified workers [we found] in September 2013.
  - Follow up with the adult family homes that did not respond to our audit request to ensure all their workers meet I-1163 requirements.
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# Background

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Individual Providers and workers employed by licensed home care agencies provide long-term care services to clients living in their own homes, while employees at adult family homes and assisted living facilities care for the people living in those facilities.

The law requires long-term care workers to complete five hours of orientation and safety training before providing paid personal care services. Workers have 120 days to complete an additional 70 hours of basic training and 200 days from the date of hire to successfully pass a certification exam. Applicants with limited proficiency in English can qualify for a provisional certificate that allows them an additional 60 days to pass the exam.

Certain categories of long-term care workers are exempt from some I-1163 requirements.

- People who worked in a long-term care setting between January 1, 2011, and January 6, 2012, and completed all training requirements at that time
- People caring for their biological, step or adoptive child or parent
- Registered Nurses, Licensed Practical Nurses, Advanced Registered Nurse Practitioners, and Nursing Assistants-Certified or people who are in the process of becoming Nursing Assistant-Certified within the required timeline
- Individual Providers caring for only one client and working 20 hours or less a month
- Respite care providers who provide 300 hours of care or less in a calendar year
- Certified teachers with a special education endorsement through the Office of Superintendent of Public Instruction

Applicants must pass a Washington state background check before they can begin working, and then are allowed to work for up to 120 days while the required federal fingerprint-based background check is processed. Workers must pass a state background check every two years.

All Individual Providers, and certain home care agency employees, are members of the Service Employees International Union (SEIU) Healthcare 775 NW. The state enters into an agreement with the SEIU every other year that covers the terms and conditions of members' employment.

## **DSHS and DOH share responsibility for the home care aide program**

DSHS and DOH are responsible for implementing, overseeing and enforcing I-1163's requirements.

- DSHS is responsible for background check screening, approving training curriculum, approving trainers, and forwarding individual provider applicant information for those who must be certified to DOH. DSHS also monitors providers working in client homes and state licensed facilities to ensure compliance with I-1163 requirements.

- DOH is responsible for certifying workers who have passed the exam and have met the background check and training requirements. DOH contracts with Prometric, an independent testing company, to administer the certification exam. DOH is also responsible for maintaining this information in its licensing database.

In fiscal year 2015, DSHS spent \$26.5 million and DOH spent \$1.7 million to administer and monitor the home care aide certification program.

Two systems provide training for applicants. The Training Partnership, a nonprofit school formed by SEIU Healthcare 775 NW and participating employers, including the state of Washington, trains about 60 percent of home care aides. The remainder are trained through a network of community instructors approved by DSHS.

# Scope and Methodology

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We used three approaches to address the audit objectives:

**To determine what progress DSHS and DOH have made in identifying barriers to certification** – We followed up with the agencies on their progress in implementing our recommendation to identify and address barriers that deter workers from completing the certification process.

**To calculate completion rates** – We analyzed DOH’s certification data for workers who applied for certification between January 1, 2014, and June 30, 2015, to determine if completion rates had improved since the last audit. We removed applicants exempt from the certification process and ended up with a pool of almost 14,000 applicants — 9,029 applicants from 2014, and 4,632 applicants from 2015. We calculated the overall completion rate as a percentage of applicants who were issued a certificate.

**To determine if DSHS implemented our recommendations regarding monitoring of adult family homes** – We followed up with DSHS management, reviewed the agency action plan and verified actions taken.

## **Audit performed to standards**

We conducted this performance audit under the authority of state law (RCW 43.09.470), approved as Initiative 900 by Washington voters in 2005, and in accordance with Generally Accepted Government Auditing standards (December 2011 revision) issued by the U.S Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. See **Appendix A**, which addresses the I-900 areas covered in the audit.

## **Next steps**

Our performance audits of state programs and services are reviewed by the Joint Legislative Audit and Review Committee (JLARC) and/or by other legislative committees whose members wish to consider findings and recommendations on specific topics. Representatives of the State Auditor’s Office will review this audit with JLARC’s Initiative 900 Subcommittee in Olympia. The public will have the opportunity to comment at this hearing. Please check the JLARC website for the exact date, time, and location ([www.leg.wa.gov/JLARC](http://www.leg.wa.gov/JLARC)). The State Auditor’s Office conducts periodic follow-up evaluations to assess the status of recommendations and may conduct follow-up audits at its discretion.

# Audit Results

## DSHS and DOH continue to identify and address barriers to certification

We found both agencies have made efforts to respond to our earlier recommendation to identify and address barriers some applicants face in the certification process. We observed four areas in which the agencies have made progress.

**Sharing data to identify trends and monitor progress.** Our last report showed that DOH, DSHS and the Training Partnership were working on ways to share data that would help them identify trends, monitor applicant progress and enforce compliance. Agencies implemented data sharing by late 2014 as planned.

DSHS is using the shared data to identify trends. For example, one report tracks exam passage rates by instructor, language and exam site, while another identifies the points in the process where people tend to drop out. DSHS is particularly concerned about why some people finish training but do not take the exam. DSHS hired one full-time employee in May 2016 who will use the trend reports to help identify barriers to completing certification and maintaining a stable workforce.

To monitor applicant progress and terminate contracts for ineligible providers, the Training Partnership sends DSHS a separate, daily report on provider training progress. DSHS reported that in 2015, payments to providers were appropriate 99 percent of the time based on training requirements.

**Helping applicants with limited English proficiency.** The 2014 audit found that the passing rate for non-English-speakers was much lower than for English speakers. In October 2015, as part of their effort to help applicants with limited English proficiency, DSHS and the Training Partnership published a glossary of terms that do not easily translate to other languages. Prometric also incorporated this glossary into the exam terminology to help applicants understand multiple choice questions and skills-based tasks.

In August 2014, DOH started paying for translator services through a pilot project for exam takers who speak a language other than one of the 13 languages already offered. Due to the success of the project, DOH secured funds to extend the services through June 2017.

**Streamlined the applications.** At the time of our 2014 audit, DSHS and DOH were working to create a universal application form, with a planned completion date of December 31, 2015. DOH and Prometric combined their two forms – DOH’s home care aide certificate application and Prometric’s exam application – into one form in April 2016. DSHS management decided that their form, which is an application to contract with DSHS as an Individual Provider, cannot be combined because it is not part of the certification application process.

**Lowered exam passing scores.** In May 2014, DOH created three exam forms, each with its own passing score determined by the difficulty of the questions. For two exams, the passing score is 70; the third has a passing score of 74. All are lower than the previous required score of 82. DOH did this to better reflect the minimum competency actually required to perform personal care tasks.

### Process improvements made by DSHS and DOH

- Continued focus on applicants with limited English proficiency
- Successful efforts at sharing data to identify trends and monitor progress
- Streamlined the application
- Lowered the exam’s passing score

### Home care aide certification checklists, training and testing are available in

Arabic • Cambodian  
Chinese • English • Korean  
Laotian • Russian • Samoan  
Somali • Spanish • Tagalog  
Ukrainian • Vietnamese

DOH applied the new passing score retroactively to July 1, 2013, and 200 applicants received passing scores. Of those 200 applicants, 65 took advantage of their new passing score and became certified.

### The number of applicants has increased since our 2014 report, but completion rates remain the same

As shown in Exhibit 1, certification completion rates have remained flat, although the number of applicants has increased. In 2013, the completion rate was 58 percent. During our audit period, 56 percent of applicants completed the certification process. The previous audit found that 6,776 workers applied for certification in 2013; the number of applicants increased by approximately one-third in 2014 to 9,029.

### Challenges to raising certification numbers remain, not all of which are in the agencies' control

As we learned during the last audit, many factors contributing to a flat completion rate are outside the state's control. For example, some people caring for a family member might decide not to pursue the 75 hours of training required to gain the certificate. Some people decide to pursue other types of employment, while others fail the background checks.

That said, additional barriers to certification may be within the control of the administering agencies or their partners, the Training Partnership or Prometric. Other barriers that might exist:

- The complexity of the certification process
- Access to training and exams
- Challenges related to limited English proficiency

We are exploring these potential barriers in another audit, which we expect to publish in late 2016.

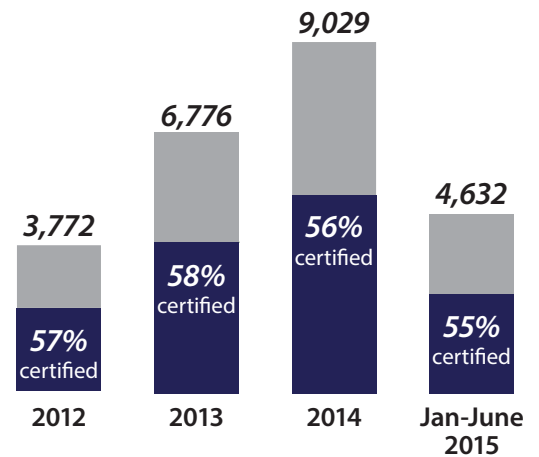
### DSHS implemented our recommendation related to monitoring of adult family homes

In the 2014 audit, we reviewed workers credentials at a sample of adult family homes to assess DSHS' efforts to monitor whether employees meet the initiative's requirements.

Most workers met I-1163 requirements, suggesting monitoring efforts are reasonable.

- About 95 percent did not need a home care aide certificate
- About 4 percent (10 people) needed but did not obtain a certificate

Exhibit 1 – Completion rates for total number of applicants 2012 through June 2015



Source: Auditor prepared using data from DOH.



DSHS implemented our recommendations to notify adult family homes about their responsibilities related to I-1163, and to follow up with homes that employed uncertified workers and those homes that did not respond to our 2014 survey.

- In December 2014, DSHS sent a written notice to all adult family homes reminding them of their responsibility to meet I-1163 requirements
- DSHS took appropriate actions to ensure workers in adult family homes were certified:
  - Staff immediately followed up with the adult family home with a caregiver who was still employed but did not have a home care aide certificate
  - At the next scheduled monitoring inspection, staff reviewed the qualifications of all caregivers in the homes where the nine uncertified workers we identified had been employed
  - In January 2015, staff followed up with the homes that did not respond to our audit request

# Recommendations

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We recommend that DSHS and DOH continue to work to identify and address barriers to home care aide certification.

We expect to identify additional recommendations as a result of our audit examining barriers to certification, due to be published by December 2016.

# Agency Response

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## STATE OF WASHINGTON

August 2, 2016

The Honorable Troy Kelley  
Washington State Auditor  
P.O. Box 40021  
Olympia, WA 98504-0021

Dear Auditor Kelley:

Thank you for the opportunity to review and respond to the State Auditor's Office (SAO) performance audit report on I-1163: Long-Term Care Worker Certification Requirements 2016. The Office of Financial Management worked with the Department of Health and Department of Social and Health Services to provide this coordinated response.

We appreciate the recognition of the State Auditor's Office of the significant efforts the agencies have made and continue to make since the last audit, including sharing data to identify trends and monitor progress, helping applicants with limited English proficiency, streamlining applications and lowering exam passing scores.

Identifying and removing barriers to certification, to the extent we are able, continues to be a primary objective. We look forward to reviewing additional recommendations that may come with the SAO's performance audit examining barriers to certification that is due later this year.

Sincerely,

Handwritten signature of David Schumacher in black ink.

David Schumacher, Director  
Office of Financial Management

Handwritten signature of Patricia K. Lashway in black ink.

Patricia K. Lashway, Secretary  
Department of Social & Health Services

Handwritten signature of John Wiesman in black ink.

John Wiesman, DrPH, MPH  
Secretary of Health  
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cc: David Postman, Chief of Staff, Office of the Governor  
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# OFFICIAL STATE CABINET AGENCY RESPONSE TO THE PERFORMANCE AUDIT ON I- 1163: LONG-TERM CARE WORKER CERTIFICATION REQUIREMENTS 2016

AUGUST 2, 2016

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This coordinated management response to the State Auditor's Office (SAO) performance audit report received July 14, 2016, is provided by the Office of Financial Management, Department of Health (DOH), and Department of Social and Health Services (DSHS).

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## **SAO PERFORMANCE AUDIT OBJECTIVES:**

The SAO designed the audit to assess how successful DOH and DSHS efforts to improve certification completion rates have been and if previous recommendations have been implemented.

1. What progress have DOH and DSHS made in identifying barriers to certification?
  2. Have the certification completion rates among home care aide applicants increased since the last audit?
  3. Has DSHS implemented our recommendations regarding the monitoring of adult family homes?
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**SAO Conclusion:** More people have become certified home care aides; however, completion rates remain about the same as our previous audit at 56 percent.

**SAO Finding:** More work may need to be done by DSHS and DOH to address barriers applicants face to become certified.

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**SAO Recommendation:** DSHS and DOH continue to work to identify and address barriers to home care aide certification.

**STATE RESPONSE:** DOH and DSHS agree with the recommendation and will continue to work closely together and with other stakeholders to identify and address barriers to home care aide certification.

## **Action Steps and Time Frame**

- The agencies will continue to work together and with other interested parties. *Ongoing.*
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# Appendix A: Initiative 900

Initiative 900, approved by Washington voters in 2005 and enacted into state law in 2006, authorized the State Auditor’s Office to conduct independent, comprehensive performance audits of state and local governments. Specifically, the law directs the Auditor’s Office to “review and analyze the economy, efficiency, and effectiveness of the policies, management, fiscal affairs, and operations of state and local governments, agencies, programs, and accounts.” Performance audits are to be conducted according to U.S. Government Accountability Office government auditing standards.

In addition, the law identifies nine elements that are to be considered within the scope of each performance audit. The State Auditor’s Office evaluates the relevance of all nine elements to each audit. The table below indicates which elements are addressed in the audit. Specific issues are discussed in the Results and Recommendations section of this report.

I-900 element	Addressed in the audit
1. Identify cost savings	<b>No.</b> The audit’s purpose was to determine completion rates and to follow up on previous recommendations. It did not address any cost savings potential.
2. Identify services that can be reduced or eliminated	<b>No.</b> While the audit identified improvements and completion rates, it did not seek to determine if any services could be reduced or eliminated.
3. Identify programs or services that can be transferred to the private sector	<b>No.</b> The audit’s purpose was to determine completion rates and to follow up on previous recommendations. It did not seek to determine if programs or services could be transferred to the private sector.
4. Analyze gaps or overlaps in programs or services and provide recommendations to correct them	<b>No.</b> This audit did not evaluate the certification process and therefore did not analyze any gaps or overlaps in services.
5. Assess feasibility of pooling information technology systems within the department	<b>No.</b> The evaluation of information technology systems were not relevant to the objectives of this audit.
6. Analyze departmental roles and functions, and provide recommendations to change or eliminate them	<b>No.</b> The audit’s purpose was to determine completion rates and to follow up on previous recommendations. It did not seek to provide recommendations to change or eliminate department roles and functions.
7. Provide recommendations for statutory or regulatory changes that may be necessary for the department to properly carry out its functions	<b>No.</b> This audit did not consider any possible changes to statutory or regulatory requirements as those items were not relevant to the audit objectives.
8. Analyze departmental performance, data performance measures, and self-assessment systems	<b>Yes.</b> This audit analyzed the completion rates of home care aide applicants and the progress the agencies made in implementing the recommendations made in the prior audit.
9. Identify relevant best practices	<b>No.</b> The Washington home care aide certification program is unique; there is no comparable program in the country that would allow for an analysis of best practices.