



Center for Medicaid and State Operations/Survey and Certification Group

Ref: S&C-10-03-ESRD

**DATE:** October 30, 2009

**TO:** State Survey Agency Directors

**FROM:** Director  
Survey and Certification Group

**SUBJECT:** Centers for Medicare & Medicaid Services (CMS) Approval of State and National Certification Programs for Patient Care Dialysis Technicians (PCTs) under the new End Stage Renal Disease (ESRD) Conditions for Coverage

**Memorandum Summary**

- **PCT Certification:** CMS regulations require certification of Patient Care Dialysis Technicians (PCTs) by April 15, 2010, for all PCTs who have been employed in dialysis facilities since October 14, 2008.
- **Ongoing Certification Dates:** PCTs hired after October 14, 2008, must be certified within 18 months of their date of hire.
- **Approved Certification Programs:** CMS has approved 3 National PCT certification programs and 10 State PCT certification programs as meeting CMS requirements.
- **Obtaining CMS Approval of Certification Programs:** National or State certification programs that desire CMS approval must show that their programs meet CMS requirements of (1) a qualifying standardized test; (2) an independently-proctored and protected test environment; and (3) ongoing re-certification. Requests for program review and approval should be addressed to [ESRDSurvey@cms.hhs.gov](mailto:ESRDSurvey@cms.hhs.gov).
- **Attachments to Memo:** Two appendices are attached to this Memorandum. Appendix A describes State PCT certification programs. Appendix B describes the National PCT certification programs.

**Background:**

The new ESRD Conditions for Coverage require that dialysis patient care technicians (PCTs) who have been employed since October 14, 2008, must be certified by either a State or a National PCT certification program by April 15, 2010. PCTs hired after October 14, 2008 must be certified within 18 months of their date of hire. CMS will count all PCT work experience, regardless of changes in employer, in determining the 18-month time period allowed for completion of certification. If a PCT has a break in employment as a PCT for 18 months or more, then the 18-month count for certification begins anew.

## **CMS Approval of State and National Certification Programs for PCTs**

Certification can occur under the aegis of either a CMS-approved State or National PCT certification program. The CMS requirements for an approved program include (1) a qualifying standardized test; (2) an independently proctored and protected testing environment; and (3) ongoing re-certification. For a PCT certification program to be approved by CMS, the sponsoring entity (State or National program) must apply to CMS. The request for approval and a statement describing how the program meets CMS PCT certification requirements should be submitted to the ESRD mailbox at [ESRDSurvey@cms.hhs.gov](mailto:ESRDSurvey@cms.hhs.gov). Two appendices describing the CMS requirements for an approved PCT certification program are attached to this Memorandum. Appendix A describes States that either have State-provided PCT certification programs or require PCT certification from a CMS-approved National program. Appendix B describes the National programs that provide PCT certification.

### **Definition of a PCT**

The CMS requirement for PCT certification applies to unlicensed individuals providing **direct patient care**. PCTs are described in a variety of terms, including “biomedical technician” and “dialysis assistant.” For purposes of CMS technician certification requirements, a PCT is any unlicensed staff member who has responsibility for direct patient care, including setting up the dialysis machine for patient use and testing reprocessed dialyzers that have been placed on the machine for presence or absence of germicide. A person who reprocesses dialyzers and/or maintains or “takes down” dialysis machines after use and who has no direct patient care contact is not considered a PCT by CMS.

### **Certification and Additional Requirements**

In addition to being certified by a CMS-approved program, PCTs must meet applicable Federal and State requirements for education, training, and competency to provide patient care in dialysis facilities. This includes any State requirements related to practice standards, certification, credentialing, licensure, or registration. Federal requirements, in addition to certification, include that the PCT have a high school diploma or equivalency (GED). Recognizing that there were PCTs with extensive experience working in dialysis facilities on the effective date of these new regulations (10/14/2008) who may not have verification of a high school diploma or GED, PCTs with greater than 4 years of PCT work experience in dialysis as of 10/14/08 may use that work experience in lieu of the requirement for a high school diploma or GED. CMS also requires that PCTs complete a job-specific training program which addresses the curricula prescribed by the ESRD Conditions for Coverage (CfCs) at §494.140(e)(3) before independently providing care to patients.

### **Currently Approved PCT Certification Programs**

At the time of the publication of the new ESRD CfCs, there were three National, commercially-available PCT certification programs: the Board of Nephrology Examiners for Nursing and Technology (BONENT), the Nephrology Nursing Certifying Commission (NNCC); and the National Nephrology Certification Organization (NNCO). CMS has approved all three of these National programs as meeting CMS requirements for PCT certification. The three National certification programs are described in Appendix B.

To identify States that have implemented PCT certification programs which are equivalent to the approved commercial National certification programs, CMS researched information pertaining to all States & Territories. The results of this investigation are presented in Appendix A. The information in Appendix A was obtained by using the following search methods: (1) searching State government Web sites for licensing rules and language in the State Nurse Practice Acts applicable to the regulation of PCTs; (2) contacting national organizations involved with PCTs including the National Association of Nephrology Technicians (NANT), the National Kidney Foundation’s Council of Nephrology Nursing and Technologists (NKF-CNNT), the American Nephrology Nurses’ Association (ANNA), and the National Renal Administrators’ Association (NRAA); (3) working with ESRD Networks; and (4) interviewing specialists from State Survey Agencies, State Boards of Nursing, and State Kidney Programs. Those State programs listed in Appendix A with a checkmark under the first column are approved by CMS. Additional States that wish to apply for CMS approval of their State PCT certification program, may apply by using the process described in this Memorandum. The Appendices describing the State and National PCT certification programs will be posted on the Providing Data Quickly (PDQ) Web site and periodically refreshed. In addition, CMS will make the current and all updated versions of the Appendices available to the nephrology community for posting on publicly-available Web sites.

Please address questions and comments about this memorandum to Judith Kari at [judith.kari@cms.hhs.gov](mailto:judith.kari@cms.hhs.gov).

**Effective Date:** The information contained in this memorandum is current policy and is in effect for all ESRD facilities. The State Agency should disseminate this information within 30 days of the date of this memorandum.

/s/  
Thomas E. Hamilton

Attachment: State Certification Grid for Patient Care Dialysis Technicians

cc: Survey and Certification Regional Office Management

## Appendix A: State PCT Certification Programs - States with Provisions or Requirements that Meet CMS Approval

**Purpose:** Appendix A was developed to identify States that have implemented PCT certification programs which are equivalent to the approved commercial national certification programs and includes the following information:

- **State Meets CMS Requirements for PCT Certification through Option A or Option B:** CMS requirements include the following elements: (1) a qualifying standardized test; (2) an independently proctored and protected test environment; and (3) ongoing recertification. A √ indicates the State program meets these requirements by either Option A (a State provided equivalent program); or Option B (State requires PCTs be certified by a National certification program); or choosing elements from each of these options to meet all three of the CMS required elements.
- **Qualifying Standardized Test:** A √ indicates that the State test is a “qualifying standardized test” that meets the following CMS definition:
  - **Expert development and review:** The test is developed by a group of subject matter experts representing more than one provider entity. The test is reviewed by a qualified entity (i.e., a university, State licensing board, test-development company, or another entity approved by CMS) for internal consistency and to ensure the test covers both common and critical tasks.
  - **Content adequacy, validity, equivalency, and scoring:** The test measures a student’s performance against specific standards; in this case against the required curricula items for a PCT and the knowledge and skills a PCT must demonstrate. The test measures similar information under the same testing conditions; all test takers (with the exceptions of those with certain disabilities) must be given the same amount of time to compete their exams; the test environment must be quiet and controlled. The “qualifying standardized test” must be equivalent to a national standardized test. The test must be scored and have a set passing score.
  - **Reliability:** The test produces consistent scores among different testing conditions or versions of the test. The test works the same way for all test takers; the language and wording of test questions are free of cultural, racial, ethnic, gender, and other forms of bias that may inappropriately affect students’ performance.
  - **Integrity:** The test questions are protected from distribution outside of the test environment. The test questions are refreshed periodically to prevent future test takers from receiving biased learning from past test takers.
  - **Protected:** The test is protected from casual distribution.
- **Independently Proctored and Protected Test Environment:** A √ indicates that the test (either State or National) is given in a controlled environment by an independent proctor, and the test environment safeguards the test from inappropriate review. **Ongoing Recertification:** A √ indicates the State requires maintenance of certification by continuing education requirements equivalent to those for recertification by the National certification organizations, or requires recertification by the National certification organization.
- **State Requires National Certification:** A √ in these boxes indicates the State requires the certification elements (i.e., standardized test, independently proctored and protected environment, and ongoing certification) for PCTs be met through the use of a CMS-approved National certification organization. The following organizations have been approved:
  - **BONENT: Board of Nephrology Nursing & Technology**
  - **NNCC: Nephrology Nursing Certifying Commission**
  - **NNCO: National Nephrology Certification Organization**
- **State Has Dialysis Regulations:** A √ indicates there are State regulations affecting dialysis clinics. The regulations may or may not address regulation or certification of PCTs.
- **State Requires PCT Certification:** A √ indicates there is a State regulation requiring certification of PCTs by a either a State-administered program or by a National certifying board

## Appendix A: State PCT Certification Programs

State Information		Option A State Provides Elements of CMS Approval			Option B State Requires National Elements for CMS Approval			State Requirements	
State Meets CMS Requirements for PCT Certification through Option A or Option B	State or Territory	Qualifying Standardized Test	Independently Proctored & Protected Test Environment	Ongoing Recertification	Standardized Test	Independently Proctored & Protected Test Environment	Ongoing Recertification	State Has Dialysis Regulations	State Requires PCT Certification
	AK								
	AL							√	
	AR								
	AS								
√	AZ				√	√	√	√	√
√	CA	√	√	√				√	√
√	CO				√	√	√	√	√
√ <sup>1</sup>	CT				√	√	√	√	√ <sup>1</sup>
	DC								
	DE								
	FL								
	GA							√	
	GU								
	HI								
	IA								
	ID								
	IL							√	
	IN								
	KS								
	KY			√				√	√
	LA							√	
	MA							√	
	MD	√		√				√	√
	ME							√	
	MI								
	MN								
	MO								
√	MS				√ <sup>2</sup>	√ <sup>2</sup>	√ <sup>2</sup>	√	√
√	MT				√ <sup>3</sup>	√	√ <sup>3</sup>	√	√
	NC								
	ND								
	NE								
	NH								

## Appendix A: State PCT Certification Programs

State Information		Option A State Provides Elements of CMS Approval			Option B State Requires National Elements for CMS Approval			State Requirements	
State Meets CMS Requirements for PCT Certification through Option A or Option B	State or Territory	Qualifying Standardized Test	Independently Proctored & Protected Test Environment	Ongoing Recertification	Standardized Test	Independently Proctored & Protected Test Environment	Ongoing Recertification	State Has Dialysis Regulations	State Requires PCT Certification
	NJ							√	
√	NM	√	√	√				√	√
	NMI (Saipan)								
	NV							√	
	NY							√	
√	OH			√ <sup>4</sup>	√ <sup>5</sup>	√		√	√
√	OK								
√	OR			√ <sup>6</sup>	√	√		√	√
	PA								
	PR							√	
	RI							√	
	SC							√	
	SD							√	
	TN							√	
	TX							√	
	UT							√	
√	VA				√	√	√	√	√
	VT							√	
	VI								
	WA							√	
	WI								
√ <sup>7</sup>	WV				√	√	√	√	√ <sup>7</sup>
	WY							√	

<sup>1</sup> CT requires PCT certification if the PCT gives medications (saline, heparin, lidocaine); CMS requires all PCTs be certified

<sup>2</sup> MS accepts only NNCC exams and requires PCTs to take the exam at the Board of Nursing office; accepts only NNCC recertification

<sup>3</sup> MT accepts only NNCC or BONENT exams for PCT certification /recertification

<sup>4</sup> OH provides an equivalent state recertification program independent from the national certification boards

<sup>5</sup> OH accepts only NNCO or BONENT exams for PCT certification

<sup>6</sup> OR provides an equivalent state recertification program independent from the national certification boards

<sup>7</sup> WV has required national certification for PCTs since 7/1/2006; PCTs employed or trained prior to that date were grandfathered; CMS does not allow this exception

## Appendix B: National Commercial PCT Certification Organizations

National Organization	Board of Nephrology Examiners Nursing and Technology (BONENT)	Nephrology Nursing Certifying Commission (NNCC)	National Nephrology Certification Organization (NNCO)
<b>Certification provided</b>	Certified Hemodialysis Technologist/Technician (CHT)	Certified Clinical Hemodialysis Technician (CCHT)	Certified Clinical Nephrology Technology (CCNT)
<b>Certification period</b>	Every 4 years	Every 2 years prior to 11/1/2009; every 3 years effective 11/1/2009	Every 4 years
<b>Recertification offered</b>	Re-exam or 40 contact hours of in-person continuing education, of which 15 contact hours can be earned from other education specified on BONENT Web site	Re-exam or <b>prior to 11/1/09</b> , 20 contact hours of continuing education plus 2000 work hours every 2 years; <b>effective 11/1/2009</b> , 30 contact hours of continuing education plus 3,000 work hours every 3 years; <b>effective 11/1/2011</b> , 10 contact hours of continuing education plus 1,000 work hours/year with recertification every 3 years.	Re-exam or 30 contact hours of continuing education, of which 15 contact hours can be earned from work in nephrology (3.75 contact hours/year)
<b>Educational requirement(s) to apply for examination</b>	High school diploma or equivalency; if no evidence of high school diploma, > 4yrs of dialysis work experience can substitute	High school diploma or GED; if no evidence of either, dialysis work experience >4 years can substitute	High school diploma or equivalency OR four years of full time experience in the field of nephrology technology
<b>Training/experience requirement(s) to apply for examination</b>	12 months of experience in nephrology patient care and current active work in an ESRD facility or successful completion of an accredited dialysis course approved by the BONENT Board.	Successful completion of PCT training program (classroom & supervised experience); signed verification by preceptor of training and clinical experience; recommend ≥6 months (1000 hours) of clinical experience, including training, prior to exam	1 year training program in nephrology technology with clinical experience and/or training program and clinical experience equivalent to 1 year. OH requires 12 months specified dialysis care experience
<b>Testing sites</b>	Providers may be test sites for paper & pencil tests. Independent test sites are used for computer-based tests. BONENT accommodates people with ADA disabilities.	ANNA chapters & dialysis clinics may host paper & pencil tests at on or off-site locations. In 2010 NNCC will offer computer-based tests at CBT centers. NNCC accommodates disabilities & religious convictions against Saturday tests.	Computer-based tests are offered at hundreds of PSI/LaserGrade Computer Testing sites in the U.S. and Canada. NNCO accommodates ADA disabilities & religious convictions against Saturday tests.
<b>Proctored Test</b>	Yes	Yes	Yes
<b>Web site</b>	<a href="http://www.bonent.org">http://www.bonent.org</a>	<a href="http://www.nncc-exam.org">http://www.nncc-exam.org</a>	<a href="http://nnco.nbccc.net">http://nnco.nbccc.net</a>