



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.
- **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. 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.

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