



STATE OF WASHINGTON

August 30, 2022

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

Dear Auditor McCarthy:

Thank you for the opportunity to review and respond to the State Auditor's Office performance audit on Initiative 1163: Addressing Testing Barriers for Home Care Aides. The Department of Health and Office of Financial Management worked together to provide this response.

We appreciate the work of the performance audit team, and value the opportunity to respond to your recommendations. We acknowledge that the home care aide credentialing process has room for improvement. We will work with our partners to implement several of the recommended changes to make this process easier and more efficient for applicants.

We also appreciate that the report recognizes the additional challenges that the COVID-19 pandemic posed for every aspect of the home care aide credentialing process. Due to the impacts of the pandemic, we believe the data and timeframes reflected in this audit do not represent what applicants experienced prior to the pandemic, nor what they will experience going forward. Given the unpredictable work stoppages and backlogs unique to this time period, it is challenging to build a timeline-centered improvement plan based upon these data.

We thank your team for their work on this audit. We look forward to engaging with our partners and applicants to identify and mitigate barriers to completing the credentialing process in a reasonable amount of time.

Sincerely,

A handwritten signature in blue ink, appearing to read "Umair A. Shah".

Umair A. Shah, MD, MPH
Secretary of Health

A handwritten signature in black ink, appearing to read "David Schumacher".

David Schumacher
Director
Office of Financial Management

cc: Jamila Thomas, Chief of Staff, Office of the Governor
Kelly Wicker, Deputy Chief of Staff, Office of the Governor
Nick Streuli, Executive Director of Policy and Outreach, Office of the Governor
Mandeep Kaundal, Director, Results Washington, Office of the Governor
Tammy Firkins, Performance Audit Liaison, Results Washington, Office of the Governor
Scott Frank, Director of Performance Audits, Office of the Washington State Auditor

OFFICIAL STATE CABINET AGENCY RESPONSE TO THE PERFORMANCE AUDIT ON INITIATIVE 1163: ADDRESSING TESTING BARRIERS FOR HOME CARE AIDES – AUGUST 30, 2022

The Department of Health and Office of Financial Management provide this management response to the State Auditor’s Office performance audit report received on August 5, 2022.

SAO PERFORMANCE AUDIT OBJECTIVES:

This performance audit was designed to address the question:

- How can the Department of Health (DOH) reduce testing barriers for home care aides?
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Recommendations to DOH:

SAO Recommendations 1-2: To address delays between training and testing, we recommend considering solutions pursued by comparable professions and other states, including:

1. Introduce legislation requesting similar authority and discretion in testing home care aides as the Nursing Commission has for testing certified nursing assistants.
2. Work with the Department of Social and Health Services (DSHS), the SEIU 775 Benefits Group, Prometric, and community trainers to:
 - a. Develop and implement a plan to integrate testing into training, allowing applicants to test at the same location where they train
 - b. Allow remote testing within home care aide training programs, immediately after graduation or shortly after completion of the program
 - c. Determine the benefits and costs of having home care aide training programs authorizing applicants to test instead of DOH

STATE RESPONSE:

1. DOH agrees that testing flexibility could benefit applicants. DOH is working with DSHS, which has authority over training programs, and Prometric to explore whether training programs are willing and able to authorize applicants to test.
2. DOH agrees with exploring this recommendation; however, the department does not have statutory authority over training programs.

DOH will conduct a cost-benefit analysis of having trainers (rather than the department) authorize applicants to test. Implementation of these changes would require significant technological changes by Prometric or an alternative testing vendor (at this time there are no other vendors interested).

Action Steps and Time Frame:

- Work with DSHS, the Training Partnership, community trainers, and Prometric to evaluate the viability of integrating testing into training and allowing remote testing. *By Jan. 31, 2023.*
 - Conduct a cost-benefit analysis of having trainers (rather than the department) authorize applicants to test. *By June 30, 2023.*
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SAO Recommendation 3: To address these delays, we also recommend DOH:

3. Work with Prometric to allow applicants to schedule tests during training, so they can plan on testing shortly after completing training.

STATE RESPONSE:

3. DOH agrees with this recommendation and is currently working with Prometric, DSHS, SEIU, Training Partnership and community trainers to implement a process that allows applicants to schedule their own exam during or shortly after completing training.

Action Steps and Time Frame:

- Work with Prometric, DSHS, SEIU, the Training Partnership and community trainers to allow applicants to schedule their own exam. *By June 30, 2023.*

SAO Recommendations 4-5: If after considering the recommendations listed above, in-person skills testing is still considered necessary, to address challenges related to a lack of test sites, we recommend:

4. Develop objective criteria (such as applicant travel times and availability of testing for comparable professions) to determine:
 - How many test sites are needed and where these sites should be located
 - How often test sites should be available to applicants
 - If there are areas of the state where it would be best to give applicants stipends for travel expenses
5. Based on the analysis described in Recommendation #4:
 - Determine how much it would cost to establish and supply additional test sites
 - Work with the Department of Social and Health Services (DSHS), the Service Employees International Union (SEIU) Healthcare 775 NW, Prometric, and other stakeholders to determine the best way to establish appropriate partnerships that can lead to new test sites
 - Establish appropriate protocols to apply for travel stipends
 - Determine how often applicants' tests are delayed due to insufficient testers at a site, and further determine how much it would cost to subsidize sites that regularly do not attract four applicants at a time
 - Work with the Legislature to acquire the necessary funding to enact these recommendations

STATE RESPONSE:

4. DOH agrees with the recommendation to develop criteria for how many test sites are needed, where they should be located and how often test sites should be available. DOH will conduct work sessions with Prometric, DSHS, SEIU, the Training Partnership, community trainers, and other interested parties on developing these criteria.

DOH also agrees it would be beneficial for some applicants to have travel stipends. We will work with our partners to explore which agency may be best equipped to administer a stipend program and what resources would be needed.

5. DOH will include in the analysis the cost and viability of providing additional test sites. We will partner with DSHS, SEIU, the Training Partnership and community training programs to determine how and if it is possible to establish new test sites.

We agree that it would be beneficial for some applicants to have travel stipends.

DOH will also work with partners to determine whether the current structure requiring at least four applicants to conduct a test is a barrier to timely testing. However, the data we currently have is not sufficient to determine the impact of lowering the four-applicant threshold. We will work with our partners to evaluate and determine the resources needed to mitigate the impact.

Action Steps and Time Frame:

- Conduct work sessions with Prometric, DSHS, SEIU, the Training Partnership, community trainers, and other interested parties to develop criteria. *By Jan. 31, 2023.*
 - Explore with our partners which agency could best administer a stipend program and the resources needed. *By Jan. 31, 2024.*
 - Explore with our partners the cost and viability of supplying additional test sites. *By June 30, 2023.*
 - Work with our partners to evaluate the requirement of having four applicants to conduct a test and determine what resources are needed to lower the four-applicant threshold. *By June 30, 2023.*
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SAO Recommendations 6-9: To address delays related to gaps in tracking and monitoring described in Chapter 3, we recommend:

6. Within a new or existing action plan, establish goals related to:
 - Reducing the overall length of time between training and testing
 - Increasing the number of available test sites
7. Establish performance measures for the goals in recommendation #6.
8. Assign one of the two offices responsible for aspects of home care aide credentialing responsibility for monitoring overall length of time between training and testing. To determine if the goals are being achieved:
 - Specifically monitor the length of time between when applicants complete training and when this information reaches DOH and regularly share these results with DSHS and the Training Partnership
 - Work with Prometric to set an agreed-upon target for length of time to get applicants scheduled to test once Prometric receives their authorizations
 - Until applicants can schedule their own tests, monitor the length of time between when Prometric learns applicants are ready to test and applicants receive their test dates
9. Establish accountability mechanisms for the overall training to testing process.

STATE RESPONSE:

6. DOH agrees with the recommendation to develop meaningful performance metrics for the home care aide program. DOH acknowledges the gap between training and testing. However, many factors beyond the department’s control may contribute to this. These factors include applicants not submitting their credential application within 14 days of hire, applicants not responding to department requests for additional information, and delays in receiving confirmation of training completion. These factors reflect the unique nature of this population. Applicants often juggle multiple clients at once; they may also have additional jobs outside long-term care and work schedules that change with little to no notice.

7. DOH disagrees with the recommendation to use length of time between training and testing as a metric for success in credentialing this unique profession for reasons detailed above. We agree that it is important to develop meaningful performance metrics to evaluate this process. DOH will engage applicants and other stakeholders to solicit feedback about customer experience and to identify what potential improvements are within the department's control.
8. This is addressed in No. 7.
9. DOH agrees with the recommendation to establish accountability mechanisms. The feedback we solicit as described in No. 7 will help us to understand from the customers' perspective the barriers to completing credentialing. This feedback will help us establish accountability mechanisms and performance metrics for the training to testing process.

Action Steps and Time Frame:

- Engage applicants and stakeholders for feedback on the customer experience to inform DOH's improvement efforts, performance metrics and accountability mechanisms. *By June 30, 2023.*
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SAO Recommendations 10-11: To address gaps in contract management described in Chapter 3, we recommend:

10. In future contract amendments, comply with state law by including all key performance measures, defining what sufficient access to test sites entails, and moving towards a performance-based contract
11. Detail the costs Prometric is expected to bear, and which are the state's responsibility, so contract management will not have to rely on the benevolence of the vendor.

STATE RESPONSE:

10. DOH agrees with the recommendation and will continue to work on meaningful performance measures to add through future contract amendments. We anticipate that the feedback we solicit from our customers can help with this effort.
11. DOH agrees with this recommendation and will continue to work with partners to evaluate all the services needed to support testing for this profession. We will also discuss with Prometric the costs and or resources associated with amending the contract to ensure that the real-time needs of the profession are met. This evaluation and discussion occur on an ongoing basis.

Action Steps and Time Frame:

- Identify performance measures to add in future contract amendments. *By Jan. 30, 2024.*
 - Evaluate and identify the costs and resources needed to support testing. *By June 30, 2023.*
 - Once the above actions are completed, DOH will put forward funding requests to ensure that implementation can be completed. *By June 2024*
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