TO: Certified Proprietary Schools Offering CNA, CMT, L1MA, or Insulin Administration Programs

FROM: Leroy Wade

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SUBJECT: Department of Health and Senior Services Regulations

As some of you are aware, the Department of Health and Senior Services (DHSS) has been reviewing its regulations on training agency approval and noted a discrepancy between previous interpretations of the policy and the current reading of the regulations. As a result, some schools that had been previously approved as training agencies are no longer considered to meet the letter of the regulations.

DHSS is the entity responsible for approving training agencies for the Certified Nurse Assistant (CNA), Certified Medication Technician (CMT), Level 1 Medication Aide (L1MA), and Insulin Administration programs. Graduates of schools that are not approved training agencies are not eligible for listing on the Certified Nurse Assistant Registry, which will negatively affect a graduate’s ability to find a job in the field. Because of this limitation, the MDHE will not approve programs in these subject areas in the absence of a current approval by DHSS.

The MDHE has been in close contact with DHSS staff to find a resolution for schools offering programs that may no longer be considered compliant with DHSS regulations. At this time, DHSS has agreed to accept MDHE certification for schools currently offering the CNA training program. Consequently, schools with MDHE-approved CNA programs are not impacted by this situation. However, schools offering CMT, L1MA, and Insulin Administration programs will be required to meet the criteria for DHSS approved training agencies as listed below. DHSS is considering potential revisions to its regulations but such changes can take a substantial time before final approval.

The MDHE understands some schools may have already applied for and received renewals from DHSS and such renewals may have included some or all of the identified programs. Those renewals are considered valid by DHSS and are acceptable documentation by the MDHE. The MDHE will require schools to provide a copy of the approval letter with recertification documentation. Failure to provide verification from DHSS of the school’s approval to act as a training agency will result in revocation of MDHE approval to offer the identified programs.
To offer CNA training as an approved training agency, the school must be one of the following:
- An area vocational technical school or comprehensive high school
- A community or junior college
- A private agency approved by the Department of Elementary and Secondary Education
- Accredited by a regional or national accrediting agency recognized by the USDE
- Certified to operate in Missouri by the Department of Higher Education (not currently in regulations - approval by policy only)

To offer CMT training as an approved training agency:
- An area vocational technical school or comprehensive high school
- A community or junior college
- A college or university offering at least a bachelor’s degree

To offer LIMA training as an approved training agency:
- An area vocational technical school or comprehensive high school
- Career centers
- A community or junior college
- A college or university offering at least a bachelor’s degree

To offer Insulin Administration training as an approved training agency:
- The instructor within the school must be approved by DHSS.