

**Community Health Worker Administrative Rules
Summary of Stakeholder Input and Proposed Changes**

*Presentation to the Promotor(a)/Community Health Worker (CHW) Training and Certification Advisory
Committee
July 25, 2014*

DSHS conducted a review of the administrative rules regarding the training and certification of promotores(as) or community health workers (CHWs) provide the guidelines for operating the training and certification program; [25 Texas Administrative Code, §§146.1-146.12](#). The review included extensive stakeholder input from community health workers (CHWs) and CHW networks/associations, members of the Promotor(a)/CHW Training and Certification Program Advisory Committee, instructors and training programs, employers, and other stakeholders. Input was gathered through meetings with stakeholders and an online survey with more than 700 responses.

Stakeholder input primarily focused on the following areas:

- A. Eligibility and certification requirements
- B. Training
- C. Employment
- D. Evaluation/outcomes

Below is a brief summary of input received and key proposed changes to CHW administrative rules.

A. Eligibility and Certification Requirements

1. Certification based on experience

- a. **Stakeholder Input:** Some stakeholders expressed concern about certification for CHWs based on experience, requesting either ending the option to become certified based on experience or requiring more stringent qualifications for certification based on experience. Other stakeholders expressed support for continuing CHW certification based on current requirements related to experience.

Discussion:

- DSHS values the levels of knowledge and experience held by many individuals applying for CHW certification.
- Experience-based knowledge brings in the practical skills learned in the field and knowledge learned through successes and failures.
- Current DSHS rules provide for CHW certification based on experience for individuals with at least 1,000 hours of community health work experience in the most recent six years. DSHS verifies an applicant's experience through supervisors.
- Strengthening the language of the rule related to CHW certification based on experience will ensure that the criteria for experience are clearly defined and verified to ensure competence in the eight core competencies.

Proposed rule change: *Eligibility requirements and application procedures - Language added to rules to strengthen provisions for verification of experience and competence.*

- §146.4 (re-ordered number) Mostly rule change to reflect current process for verification of experience – emphasis on **competence** in the tasks that reflect the core competencies

- b. Stakeholder Input:** A small number of stakeholders suggested changes to requirements for CHW instructor certification, including allowing any CHW with community experience to be certified as a CHW instructor.

Discussion:

- Current DSHS rules provide for CHW instructor certification based on experience of at least 1,000 hours of instructing or teaching CHWs, promotores, health care professionals or paraprofessionals.
- Verification of this experience with supervisors assures that the applicant has an understanding on how adults learn, the different learning styles, how to adapt their teaching to different situations, and an understanding of assessment. This is necessary to effectively deliver messages and ensure students obtain a good comprehension of the subject matter.
- Strengthening the language of the rule related to CHW instructor certification based on experience will ensure that the criteria for experience are clearly defined and verified to ensure competence in instructing or teaching the eight core competencies.

Proposed rule change: Eligibility requirements and application procedures - Language added to rules to strengthen provisions for verification of experience and competence.

- §146.4 (re-ordered number) Mostly rule change to reflect current process for verification of experience – emphasis on competence in the teaching the core competencies

- c. Stakeholder Input:** The CHW Training and Certification Advisory Committee recommended that an individual applying for certification as a CHW instructor include a signed/notarized letter to verify that the applicant has completed a minimum of 1,000 hours of training promotores or community health workers within the last six years and specifying that the applicant has met all eight core competency requirements by listing the training hours by competency and curriculum.

Discussion:

- Currently DSHS verifies instructor experience based on instructing or teaching the eight core competencies with supervisors.
- DSHS feels that strengthening the language of the rule related to CHW instructor certification based on experience will ensure that the criteria for experience are clearly defined and verified to ensure competence in instructing or teaching the eight core competencies.
- Current application procedures include an applicant’s signature certifying that all the information provided by the applicant in connection with an application is true and complete and documenting an understanding that providing false or misleading information may result in the voiding of the application and failure to be granted any certificate or the revocation of any certificate issued.
- DSHS feels that additional requirements for a notarized letter and training hours listed by competency and curriculum would present unnecessary barriers for the application process.

Proposed rule change: No additional change

- d. Stakeholder Input:**

The CHW Training and Certification Advisory Committee recommended considering ways to make recertification courses count for both CHW certification and CHW instructor certification or other ways that an individual with both certifications would not have to complete 20 CEUs for the CHW certification and another 20 CEUs for the instructor certification.

Discussion:

- CHW certification and CHW instructor certification are separate certifications with specific criteria for continuing education.
- Continuing education for CHW and CHW instructors provides the means by which the CHW Training and Certification Program can ensure highest standards of accountability.
- Allowing individuals who are certified as both a CHW and CHW instructor to complete only 20 hours for both certifications will weaken these standards.
- Although the two certifications have elements that are similar to and consistent with the other, the existing requirements recognize the importance of ongoing continuing education specific to each role.

The Committee also recommended that an individual certified as both a CHW and CHW instructor be required to complete a certain number of hours in the field as well as continuing education.

Discussion:

DSHS currently lacks data to determine whether individuals certified as both a CHW and CHW instructor have provided services as a CHW or provided training as an instructor during certification renewal periods, therefore, is not prepared to propose a rule change at this time. DSHS will consider ways to gather additional information to provide data.

No proposed rule change

2. Certification based on training

- a. Stakeholder Input:** Most stakeholders expressed support to continue the current requirements related to CHW certification based on training, including requiring certification courses to include at least 160 hours. Some stakeholders suggested allowing certification based on a combination of experience and training including establishing amount of training required on a case by case basis taking into account an individual's specific amount of experience and/or requiring all applicants to complete at least some amount of training and to have experience.

Discussion:

- DSHS supports the current requirements for initial certification training of at least 160 hours because it builds a strong foundation based on core competencies and roles of a CHW and CHW instructor and recognizes the value of incorporating opportunities to practice skills learned through training.
- Currently, some DSHS sponsoring organizations incorporate a "hands on" component within their initial CHW or instructor certification course to provide CHW or CHW instructor students with the opportunity to practice skills. DSHS proposes the addition of a requirement for all initial certification curricula for CHWs or instructors to incorporate practical "hands-on" application of skills.

Proposed rule change: *Standards for approval of curricula: Requirement added to include practical "hands on" application of skills to standards for the approval of CHW or instructor initial certification course curricula.*

- 146.8 - include a component for hands-on learning, such as field practice, internship or practicum

3. Core competencies

- a. **Stakeholder Input:** Several stakeholders noted the importance of the core competencies as the foundation of the CHW and CHW instructor workforce and a few suggested an increased focus in the core competencies for hours of experience and training of CHWs and CHW instructors.

Discussion: DSHS shares this concern and proposes to strengthen rules emphasizing the achievement of core competencies through completion of training or verified experience.

Proposed rule change: *Eligibility requirements and application procedures - Language added to rules to strengthen provisions for verification of experience and competence.*

- b. **Stakeholder Input:** The CHW Training and Certification Advisory Committee recommended that the Committee develop and recommend a list of specific standard topics and skill sets to be included in each of the core competencies.

Discussion – Activities to date:

- U.T. School of Public Health – Houston, in collaboration with Texas AHEC East-Coastal Region, is working on a revised core Curriculum Framework under an 1115 waiver project to strengthen the foundations of 160 hour certification curricula utilized in the Houston area.
- The development of the curriculum framework process includes gathering background information, conducting research, and reviewing the eight core competencies and related domains. The framework will include lesson topic, description, learning objectives, activities, sources and resources, as well as activity suggestions for each lesson.
- Intent is to share with other training programs for consideration when completed.

No proposed rule change

- *DSHS has and will continue to share information from the work in Houston with the Committee.*

4. Texas residence

- a. **Stakeholder Input:** The CHW Training and Certification Program has received several inquiries from individuals interested in CHW certification who do not live in Texas.

Discussion:

- The CHW Training and Certification Program currently processes applications for CHW or CHW instructor certification for individuals who live in Texas. Limited resources challenge DSHS from managing out of state certifications.

Proposed rule changes: Eligibility requirements and application procedures: Addition to minimum eligibility requirements to require that applicant must currently live in Texas. Changes of name and address: Addition to note that DSHS will change an individual's certification status to inactive upon receipt of notification that the certificate holder no longer lives in Texas.

B. Training

1. Training Opportunities

- a. Stakeholder Input:** Many stakeholders expressed a need for additional CHW training opportunities in specific counties, including Dallas, El Paso, McLennan, Bell, San Patricio, Nueces, Webb counties, and areas of North Texas; more training available in Spanish; and additional opportunities for CHW CEUs through CHW network/association meetings and at established conferences. Some stakeholders suggested areas to include in CHW initial certification training or continuing education, including community resources, basic computer skills, internet skills, web page navigation, stages of learning, health sciences, HIV/STDs, medical/dental/overall health topics (Healthy People 2020), mental health, emotional well-being, and substance abuse, ethics, confidentiality, counseling, family support, health care reform, accessing and utilizing health care benefits, diabetes, nutrition education, tools for career development, environmental issues, and more hands-on training and incorporation of actual life experiences.

Discussion:

- DSHS encourages programs to collaborate with CHWs, CHW network/associations, employers, and other stakeholders to identify training needs in their areas and provide training opportunities through in-person events and/or through distance learning to meet these needs.
- Training programs vary in the number of training opportunities offered, with some programs providing limited or no training over periods of time.

Proposed rule change: *Application requirements and procedures for sponsoring organizations: Requirement to include a program plan to provide training on at least an annual basis.*

- §146.6 - program plan to provide training for community health workers or instructors on at least an annual basis

2. DSHS-certified Curriculum

- a. Stakeholder Input:** Several stakeholders, including members of the CHW Training and Certification Advisory Committee, recommended allowing qualified individuals with topic expertise (but who are not certified CHW instructors) to provide instruction for CHWs or CHW instructors within the DSHS certified hours allotted to the course.

b. Discussion:

- DSHS has worked with the Advisory Committee and stakeholders to identify proposed change and criteria for implementation through procedures.
- Allowing the participation of non-certified CHW instructors to provide additional expertise within DSHS certified courses will strengthen comprehension of the subject matter.

Proposed rule change: Standards for the approval of curriculum. Provisions were added to state that training must be provided by a CHW instructor unless otherwise approved by DSHS.

- §146.8 (e) - Curricula to train persons to perform promotor(a) or community health worker services or to act as an instructor or DSHS-certified continuing education for promotores, community health workers, or instructors shall be provided by an instructor certified by the department, unless otherwise approved by the department.

- Specific criteria will be implemented through procedures. Initial conversations and study have already started on this section with stakeholders and advisory committee members. The responses were broad, therefore additional conversations and study will continue before this procedure can be finalized.

c. **Stakeholder Input:** Members of the CHW Training and Certification Advisory Committee suggested including breaks as part of approved certified CEUs for trainings over two hours in length.

DSHS Response:

- The CHW Training and Certification Program’s process for determining DSHS-certified CEUs is consistent with the process utilized by the agency’s Office of Academic Linkages which does not include breaks in CE hours for other healthcare professionals.

No proposed rule change

3. Oversight of training

a. **Stakeholder Input:** A small number of stakeholders recommended closer oversight of training and training programs.

Discussion:

- DSHS implements processes to ensure clear communication with training programs and quality program delivery and accessibility, including ongoing phone and email contact between department staff and training program contacts, review and approval of curricula, and tracking training opportunities and participation.

Proposed rule changes: DSHS proposed rule changes to clarify current processes and procedures related to standards for the approval of curricula, as well as new requirement for sponsoring organizations to include a program plan to provide at least one training annually.

- §146.5 - Change of name and address: Added provision that sponsoring organizations will notify DSHS of changes in organization name, contact information, mailing address, or physical location within 30 calendar days of such change(s).
- §146.6 - Application requirements and procedures for sponsoring organizations and §146.9 - Certificate renewal: Added provision that sponsoring organizations applying for certification or renewing as a training program must include a program plan to provide training for community health workers or instructors on at least an annual basis.
- §146.8 - Standards for approval of curricula Strengthened provisions regarding curricula requirements: Learner-centered objectives, Name/organization of the curriculum developer and approval for use, Participation by CHW instructor, Activities/strategies consistent with adult learning theory and principles, Literacy and cultural sensitivity, Translation if to be provided in language other than Spanish, Methods for delivery

C. Employment Challenges

- a. **Stakeholder Input:** Many stakeholders noted challenges related to employment opportunities for CHWs, fair remuneration for CHW services, a CHW career ladder, and opportunities for CHW professional advancement.

Discussion:

- The CHW Study Report (House Bill 2610) recognized the importance of promotores and community health workers facilitating access to certain public assistance benefits programs and health care providers and services.
- DSHS, the sponsoring organizations and CHW stakeholders, and employers will continue efforts to promote the effectiveness and value of the CHW workforce and improve employment opportunities for CHWs.

No proposed rule change

D. Evaluation/Outcomes

- a. **Stakeholder Input:** A small number of stakeholders noted a need for more evaluation to show the impact of CHW services in the community.

Discussion: The CHW Training and Certification Advisory Committee recommended and is working to finalize a set of questions to gather information from CHWs at the time of renewal.

No proposed rule change

Re-organization/re-ordering of existing rules

- DSHS proposes re-organization of the current rules to improve clarity and flow.

Next steps in the rulemaking process:

- Internal approvals (DSHS and HHSC) – Summer/Fall 2014
- DSHS Council – November 2014
- Publication of proposed rules in the Texas Register – mid January 2015
- Public comment period – mid January 2015 – mid February 2015
- Review of input from public comment and incorporation to final rules – March 2015
- Publication of final adopted rules in the Texas Register – April 2015
- Implementation of final adopted rules – May 2015