



# **Certification Training Programs Unit Town Hall Meeting**

**November 13, 2025**

MBON Staff

# GNA Testing

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## **GNA Testing Vendors**

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- Two testing vendors:
  - Credentia
  - Headmaster
- Board approved Headmaster as an additional testing vendor.

# **Certified Nursing Assistants – Licensing Requirements and Administrative Updates (House Bill 1125/SB0999)**

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## **CNA Bill (HB 1125/SB0999) Overview**

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- Effective date: April 1, 2026
- Alters the designation of and licensure requirements for a certified nursing assistant to include:
  - CNA-I: new name for what is currently called a CNA/GNA
  - CNA-II: new name for what is currently called a CNA
- The applicable Code of Maryland Regulations (COMAR) are under revision
  - Will be presented to the Board once finalized
  - COMAR 10.39.01. Certification of Nursing Assistants
  - COMAR 10.39.02. Nursing Assistant Training Programs

## Understanding the Difference Between CNA-I & CNA-II

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### CNA-I

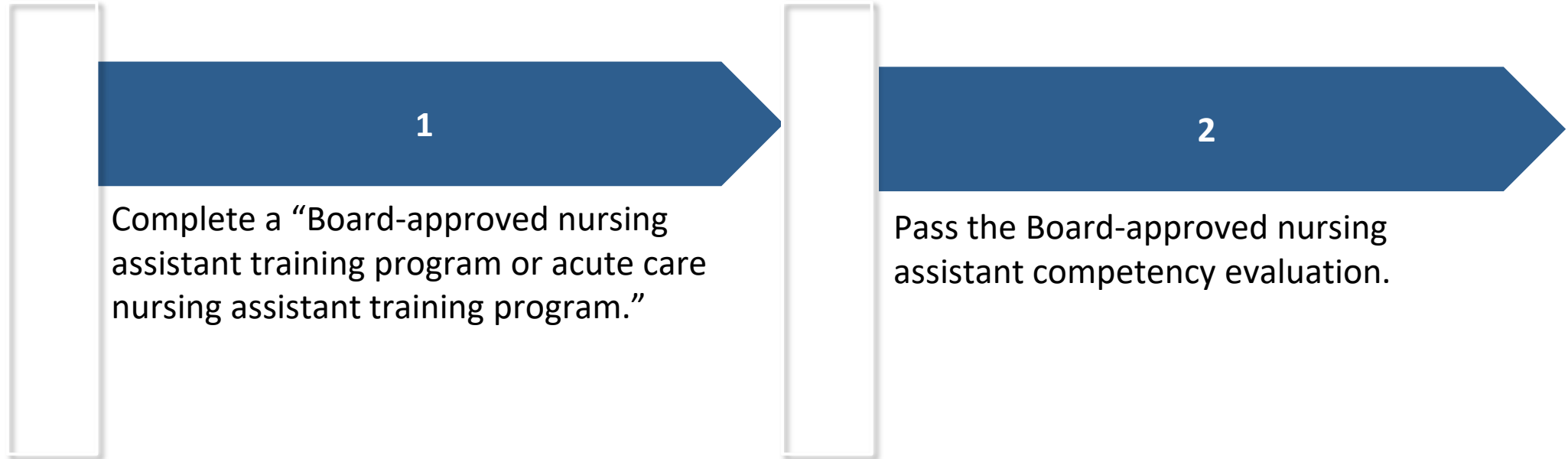
- May practice in any work setting, including:
  - A nursing facility
  - A skilled nursing facility (i.e., long-term care)

### CNA-II

- May practice in any work setting, **except**:
  - A nursing facility
  - A skilled nursing facility (i.e., long-term care)

## Initial Requirements: CNA-I Certification

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**NOTE:** Federal law prohibits nursing facilities and skilled nursing facilities from using individuals as “nurse aides” (the federal term for nursing assistant) if the individuals have not successfully completed a “nurse aide” training and competency evaluation program or competency evaluation program approved by the State.

## **Renewal Requirements: CNA-I or CNA-II Certification**

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Current language in draft regulations:

CNA-I      16 hours of active employment, for compensation, as a nursing assistant within the 2-year period immediately preceding the date of expiration or is required to take and pass a nursing assistant competency evaluation.

CNA-II     16 hours of active employment, for compensation, as a nursing assistant within the 2-year period immediately preceding the date of expiration or is required to complete a nursing assistant training program.

## **Becoming a CNA-I after April 1<sup>st</sup>, 2026**

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CNA-II certificate holders who wish to become a CNA-I must:

- Successfully complete a Board-approved nursing assistant training program;
- Pass the Board-approved nursing assistant competency evaluation; and
- Submit to the Board an application on the form that the Board requires.

## **Nursing Assistant Training Program vs Acute Care Nursing Assistant Training Program**

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- Programs will differ mainly by curriculum content.
- Current draft regulations require Board approval of both CNA and acute care CNA training programs. Both are subjected to all requirements.

## **Nursing Assistant Training Program: Faculty Qualification**

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- The Board is currently reviewing/revising the faculty requirements and awaiting a response from the Centers for Medicare & Medicaid Services regarding the interpretation of 42 CFR 483.152(a)(5)(i).
- Board will share updated language as soon as it is finalized.

## Accredited Nursing Education Programs

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**Current Law:** A student enrolled in an accredited nursing education program may perform nursing assistant tasks while practicing under the direct supervision of qualified faculty or preceptors.

**CNA Bill (HB1125/SB0999):** A student who is enrolled in an accredited nursing education program may also perform nursing assistant tasks after successfully completing a portion of the nursing education program that the Board determines meets the requirements of an approved CNA training program.

**Note:** Upon graduation from an accredited nursing education program, the graduate must apply for CNA-I certification in order to continue performing nursing assistant tasks.

## **Accredited Nursing Education Programs: Qualifying Courses**

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### **Qualifying Courses under CNA Bill (HB 1125/SB0999):**

- The draft regulations will specify the courses that qualify.
- The Board will also have the flexibility to review other courses as well.

## Hybrid Nursing Assistant Training Programs

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- Revised regulations will include the requirements for Hybrid Nursing Assistant Training Programs.
- Programs will learn more once the revised regulations are finalized and approved by the Board.

## **Nursing Assistant Training Programs: Training Program Application and Supporting Forms**

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- Training program application and supporting forms are under revision.
  - They will be made available once reviewed and approved by the Board.
  - Contingent upon revised regulations reviewed and approved by the Board.
- CNA-only training programs should:
  - Begin taking the necessary steps to comply with federal law as soon as possible.
  - Consider resubmitting their programs for approval at least 120 days before April 1, 2026.
  - Utilize the current application for program conversions until the Board approves the revised application.

## **Nursing Assistant Training Programs: Training Program Application and Supporting Forms Cont'd**

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- After March 31, 2026, the Board will be unable to certify any applicant who attended a CNA-only program.
- Contact: [mbon.cnatrainingprogram@maryland.gov](mailto:mbon.cnatrainingprogram@maryland.gov)

# **Nursing Assistant Training Program Application Submission Process: Initial vs Renewal**

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## Nursing Assistant Training Program: Documents for Approval

	Application for Initial Approval	Application for Renewal of Approval
Cover Letter	✓	✓
Approval grid	✓	✓
Completed Application	✓	✓
Statement of approval/waiver by the Maryland Higher Education Commission or approval by the Department of Education	✓	✓
Statement of Agency Approval	✓	✓
Statement of Equal Opportunity	✓	✓

## Nursing Assistant Training Program: Documents for Approval Cont'd

	Application for Initial Approval	Application for Renewal of Approval
Statement of Financial Support	✓	✓
Copy of Faculty CV/Resume(s)	✓	✓
Copy of Maryland RN license(s) or multistate license(s)	✓	✓
If applicable, copy of train-the-trainer certificate(s)	✓	✓
List of supplemental personnel with supporting documentation, if applicable	✓	✓
Faculty job description or policy statement regarding job responsibilities	✓	✓

Note: The new regulations will not require programs to submit a statement of financial support.

## Nursing Assistant Training Program: Required Documents for Approval Cont'd

	Application for Initial Approval	Application for Renewal of Approval
Description of the layout of the educational facility(ies)	✓	✓
List of educational facility(ies)	✓	✓
List of training equipment	✓	✓
List of instructional learning resources and materials with publication dates	✓	✓
List of clinical facilities	✓	✓
Completed clinical facility profile form for each clinical facility	✓	✓

# Nursing Assistant Training Program: Required Documents for Approval Cont'd

	Application for Initial Approval	Application for Renewal of Approval
Copy of statement of approval for clinical site	✓	✓
If applicable, written agreements with clinical facilities	✓	✓
Course schedule noting number of hours in classroom, laboratory, and clinical training	✓	✓
Course syllabus including curriculum and unit objectives and performance indicators (pages numbered)	✓	✓
Skill inventory with required <i>Maryland Skills Listing</i> highlighted	✓	✓

Note: A revised Maryland Skills Listing will be made available once approved by the Board.



## Nursing Assistant Training Program: Required Documents for Approval Cont'd

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	Application for Initial Approval	Application for Renewal of Approval
Student evaluation criteria	✓	✓
Final written examination	✓	✓
Achievement award	✓	✓

## **Nursing Assistant Training Programs: Other Considerations**

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- Clinical facilities
  - Civil money penalties
  - Substandard quality surveys
- Nursing Assistant Competency Evaluation Performance (New regulations)
  - Require an approved nursing assistant training program and an acute care nursing assistant training to maintain an average pass rate of 90% of the average pass rate for all states using the applicable Board-approved vendors for the nursing assistant competency evaluation.
  - Board will review the performance of graduates from each nursing assistant training program and acute care nursing assistant training program on the nursing assistant competency evaluation on an annual basis.

## **Nursing Assistant Training Programs: Other Considerations**

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- Quarterly Reports
  - Covers statistics on enrollments, program completions, and attrition rates.
  - Due on a quarterly basis (current regulations).
  - The new regulations will require programs to submit an annual report instead of a quarterly report.
  - Annual report will capture enrollments, program completions, attrition rates, and nursing assistant competency evaluation results.

## **Nursing Assistant Training Programs: Other Considerations Cont'd**

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- Substantial Program Change(s)
  - Must request and obtain Board approval of any substantial changes prior to implementation.
  - Utilize the current application to report and request approval (check change in existing program).
    - Cover letter must address the substantial change(s)
    - Submit supporting documentation

# **Health Occupations – Nursing – Dialysis Technicians (HB 218): Certified Dialysis Technician Training Programs**

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## **HB 218 Overview**

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- Repeals the requirement that a dialysis technician be a certified nursing assistant (CNA) except under certain circumstances
- Establishes a separate certification for a "certified dialysis technician" (CDT)

## CDT Regulations

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- Regulations
  - COMAR 10.39.06
  - Effective date: August 4, 2025
  - 42 CFR 494.140(e)

## **What is an approved Dialysis Technician Training Program?**

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- An approved dialysis technician training program is a course of training approved by the Board that:
  - Prepares the applicant for national certification
  - Meets specified federal requirements
  - Meets requirements set by the Board

## Requirements for Dialysis Technician Training Programs

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- Current CNA-DT training programs interested in becoming a dialysis technician training program are required to submit a completed Dialysis Technician Training Program Application for Approval.
  - Current CNA-DT training programs may operate as a CNA only Training program but must comply with federal laws by April 1, 2026.
- Training programs must obtain Board approval by demonstrating that the program meets all the requirements under state and federal law.
- Training programs that were approved under the former regulations may not operate as a dialysis technician training program until they have obtained Board approval in accordance with COMAR 10.39.06.09.
- Email application to [mbon.cdttrainingprogram@maryland.gov](mailto:mbon.cdttrainingprogram@maryland.gov)

# Program Application Submission Requirements

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**APPLICATIONS MUST INCLUDE THE FOLLOWING DOCUMENTS**  
(Please organize documents as listed below)

- Cover letter
- Completed application
- CV/Resume(s) of all faculty
  - Experience that meets regulatory requirements must be clearly listed
- Copy of faculty Maryland license(s) or multistate license(s)
- If applicable, copies of faculty certificates of completion of an adult education course approved by the Board or evidence of completion of at least 6 credit hours of an adult education program at a college or university
- If the training program utilizes a certified dialysis technician in aspects of clinical training, provide the following:
  - Copy of Maryland Certified Dialysis Technician certificate
  - Proof of current national certification
  - CV/resume demonstrating at least two years of experience in hemodialysis services
- Faculty job description and policy statement regarding job responsibilities
- Description of the layout of the educational facility
- List of educational facilities
- List of training equipment
- List of instructional learning resources and materials with publication dates
- List of clinical facilities
- If applicable, written agreements with clinical facilities
- Copy of statement of approval for clinical sites
- Course schedule noting number of hours in classroom, laboratory, and clinical
- Course syllabus including curriculum, program objectives or outcomes, unit objectives, and performance indicators
- Student evaluation criteria
- Final written examination
- Program evaluation plan

## **Required Forms for Dialysis Technician Training Programs**

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- Dialysis Technician Training Program Application
- Dialysis Technician Training Program Faculty Change Form
- Dialysis Technician Training Program Substantial Program Change Request Form
- Dialysis Technician Training Program Annual Report
- Certificates of completion (2 choices)

# Where Do I Locate the Required Forms for Dialysis Technician Training Programs?

- Go to <https://health.maryland.gov/mbon>
- Scroll down on the left until you locate “Certified Dialysis Technicians (CDT)” and click on it



- Scroll down until you locate “CDT Training Programs”



# **Health Occupations – Nursing – Dialysis Technicians (HB 218): Dialysis Technician Certification Process**

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## **Background Check Requirements**

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- Pending federal approval for updating the livescan fingerprint form for background checks.
  - Delay with issuing initial and endorsement CDT certificates

## **Dialysis Technician Certification Process: Initial Certification**

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- Upon successful completion of a Maryland Board of Nursing approved CDT training program, applicants must provide the following documents:
  - A completed initial application for CDT certification
  - Certificate of completion issued by training program (attached to the application)
  - Full-face passport-sized photo (2x2 inches – attached to page 2 of the application)
  - Receipt verifying that fingerprints have been taken (attached to the application)
  - \$20 fee attached to the application
- Contact: [mbon.dt@maryland.gov](mailto:mbon.dt@maryland.gov)

## **Dialysis Technician Certification Process: Renewal of Certification**

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- Certificate holders applying for renewal of a certificate must provide the following documents:
  - A completed CDT Renewal application
  - Certification of completion demonstrating completion of three hours of continuing education approved by the Board
  - If applicable, copy of current certification as a CCHT by the NNCC, CNT by the NNCO, or CHT by BONENT
  - \$40 fee attached to the application
  - Implicit Bias Training attestation form
    - Required if it is the certificate holder's first renewal after April 1, 2022

## **Dialysis Technician Certification Process: Renewal of Certification Cont'd**

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- Certificate of completion of a Board-approved DT training program
  - Applicable to individuals who have not practiced 16 hours for compensation as a Dialysis Technician or have not completed three hours of continuing education approved by the Board.
- Contact: [mbon.dtrenewal@maryland.gov](mailto:mbon.dtrenewal@maryland.gov)

## **Dialysis Technician Certification Process: Endorsement Certification**

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- Endorsement applicants must provide the following documents:
  - A completed CDT endorsement application
  - Certificate of completion issued by the applicant's training program
  - \$20 fee attached to the application
  - Full-face passport-sized photo (2x2 inches – attached to page 2 of the application)
  - Receipt verifying that fingerprints have been taken (attached to the application)
  - Copy of current active certification as a DT from another state (attached to the application)
  - Copy of your National Certification as a CCHT by the NNCC, CNT by the NNCO, or CHT by BONENT
  
- Contact: [mbon.dt@maryland.gov](mailto:mbon.dt@maryland.gov)

# Where Do I Locate the Forms (Initial, Renewal, and Endorsement) for CDT Certification?

- Go to <https://health.maryland.gov/mbon>
- Scroll down on the left until you locate “Certified Dialysis Technicians (CDT)” and click on it



- You will find the applications and instructions for each type of CDT certification on the webpage:
  - [Application for Initial CDT certification](#)
  - [Initial CDT Application Instructions](#)
  - [Certified Dialysis Technician \(CDT\) Renewal Application](#)
  - [Certified Dialysis Technician \(CDT\) Renewal Application Instructions](#)
  - [CDT Endorsement application](#)
  - [CDT Endorsement Application Instructions](#)
  - [Fact Sheet for CDT Endorsement](#)

## **Key Takeaways: HB 1125/SB0999 and HB 218**

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- As a point of clarification, CNA and CDT Training Program applications refer to the entire program approval package, not just the curriculum.
- Applications must include all required components outlined in the COMAR regulations governing the specific program—such as information on faculty qualifications, clinical facilities, and other supporting documentation.
- In contrast, Acute Care Nursing Assistant Training Programs require the submission and Board approval of a curriculum as part of the application process.

# Questions

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