

## SA Hospice and Home Health Agency for WebEx Call 04/23/20

1a. CMS Blanket waivers as they relate to home health and hospice:

The waivers are in place during the duration of the emergency orders and will expire when the order is lifted.

### Hospice

CMS is waiving the 12 hour annual in-service training requirement for hospice aides, which will allow aides and registered nurses who teach the in-service training to spend more time delivering direct patient care, in other words, you don't have to—we are aware there are certain requirements. You do not have to pull the aide away, or pull the nurse away at this current time, to do an in-service training. Once this pandemic is over the expectation would be that training would occur.

### Home Health

The allowance of Occupational therapists to perform initial and comprehensive assessments for all patients, so CMS is waiving the requirement that occupational therapists may only perform the initial and comprehensive assessment if occupational therapy is the service that establishes eligibility for the patient to be receiving home health care.

So what this does, it allows OT's to perform, again, the assessments for all patients receiving therapy as part of their plan of care, whether OT or not, and that will speed up the process of getting home health care started faster. The first therapist that gets there gets to do the initial assessment. When the nurse is required they will still be required to treat the patient but again it can at least get the actual process of admission started.

Even with these changes the occupational therapist still is not a service that establishes eligibility. Those requirements still must be in place. But CMS believes that this will greatly expand what a therapist can do.

1b. CMS Newsletter that came out on March 10, 2020: Subject: Guidance for Infection Control and Prevention Concerning Coronavirus Disease 2019 (COVID-19) in Home health Agencies (HHA's) and Religious NonMedical Healthcare Institutions (RNHCIs) revision Made 4/23/20\*\*\*\*Revised to include RNHCIs Guidance on COVID-19: 10 page document Reference : QSO-20-18-HHA

Hand Hygiene: Should be performed before putting on and after removing PPE using alcohol-based hand sanitizer with greater than 60% ethanol or 70% isopropanol or washing hands with soap and water for at least 20 seconds.



2. CDC Sign up for the CDC newsletter to receive updates regularly.  
*Has issued guidance on strategies for optimizing the supply of PPE available at:*  
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/index.html>

CDC: New Training for Healthcare Professionals page

Check out [Training for Healthcare Professionals](#) to find CDC courses on COVID-19 topics. Learn about clinical care, appropriate use of personal protective equipment (PPE), emergency preparedness, and more. The page will be updated as new trainings are available.

3. CARES ACT See eligibility and apply before the deadline. It is vital you keep good records of how funds are spent and there is great chance of an audit.

For this information: Go to the [CARES Act Provider relief Fund Payment Attestation portal](#) which is now open:

The overview again for this provision is that President Trump has for immediate infusion an amount of \$30 billion into the healthcare system.

Eligibility:

- All facilities and providers that received Medicare fee-for-service (FFS) reimbursement in 2019 are eligible for this initial rapid distribution.

Within 30 days of receiving the payment, providers must sign an attestation confirming receipt of the funds and agreeing to the terms and conditions of payment. Not returning the payment within 30 days of receipt will be viewed as acceptance of the Terms and Conditions.

Again I refer you to the CARES Act Provider Relief Fund Payment Attestation Portal which will guide providers through the attestation process to accept or reject the funds.

4. LICENSE RENEWAL: Request has been made but not yet granted

We have made a request to extend the application renewal due date to September 30<sup>th</sup>. If you have your application you most certainly can submit it as normal to meet the initial due date of July 31, 2020. Once the emergency declaration has ended notices will go out pertaining to the required due date.



Q: Is the fee waived for the application

A: The fee has not been waived

5. Other General Questions:

Is there flexibility for the use of telehealth in HHAs during the COVID-19 Public Health Emergency (PHE)?

*On March 30, 2020, CMS released an interim final rule that expands access to telehealth services in home health agencies during the PHE(Public Health Emergency).For more information, visit the Coronavirus Waivers and Flexibilities website at:*

<https://www.cms.gov/about-cms/emergency-preparedness-response-operations/current-emergencies/coronavirus-waivers>

Are waivers to HHA requirements being considered during the COVID-19 PHE?

*Yes, CMS announced the release of several blanket waivers intended to provide flexibilities for HHAs during the public health emergency for COVID-19. For example, CMS is waiving onsite visits for supervision, allowing for additional time to complete and submit OASIS data. Individual waiver requests will be reviewed by CMS on a case-by-case basis. For more information, visit the Coronavirus Waivers & Flexibilities website:*

<https://www.cms.gov/about-cms/emergency-preparedness-response-operations/current-emergencies/coronavirus-waivers>

We have done emergency rules to fall in line with 1135 blanket waivers, specifically for license renewal, Physician admission orders from Advance Practice Nurses and Physician's Assistants. These are for the duration of the emergency orders and will expire when the order is lifted.



6.) Question and Answer

Q) Originally guidance was the 12 hours of annual training for aides was not waived but the deadline was pushed to the end of the year, has that changed?

A) At this point nothing has been mandated regarding those hours being made up.

Q) Clarify the PA/NP requirements for orders

A) The 1135 waiver applies during the emergency order

Q) Being able to remotely access patient for admission, must you do an in person visit?

A) CMS has strongly encouraged providers to not discharge patients, put them on hold, etc if they can be served via telehealth. We are aware of the payment issues for you. With OASIS there has been an extension of time but it is not waived.

Q) Reference number again from newsletter going out today

A) QSO-20-18-HHA

Q) If a CNA has completed add on and applied but hasn't heard back can we still use them as a HHA. The testing has been completed but haven't heard status.

A) You can contact the Nurse Aide Registry for the status. [hcar@health.ok.gov](mailto:hcar@health.ok.gov) They have also asked for emergency rules be passed for training and to expedite the use of a HHA. Please contact them for clarification.

Q) Home Health Administrator License-have the deadlines been extended?

A) You can contact the Nurse Aide Registry for the status. [hcar@health.ok.gov](mailto:hcar@health.ok.gov) They have also asked for emergency rules be passed, please contact them for clarification.