

April 13, 2020

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, S.W., Room 445-G
Washington, D.C. 20201

RE: Seeking Additional Home Health Telehealth and Documentation Relief

Dear Administrator Verma:

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations, approximately 1,000 home health agencies, our clinician partners – including more than 270,000 affiliated physicians, 2 million nurses and other caregivers – and the 43,000 health care leaders who belong to our professional membership groups, **the American Hospital Association (AHA) urges the Centers for Medicare & Medicaid Services (CMS) to use its authority to extend to home health agencies additional relief to enhance their role in supporting and optimizing the overall health care system response to the COVID-19 pandemic.**

We greatly appreciate the rapid and broad-reaching relief that CMS has thus far issued to assist our hospital, health system and post-acute care members in responding to the COVID-19 crisis. As you know, hospitals are relying on home health agencies as a critically valuable discharge option for both patients with and without the virus. Such transfers allow hospitals to focus limited resources on those COVID-19 patients requiring hospital-level care. The flexibilities granted so far have furthered their vital role in helping fight the virus – especially in hot spots. In particular, the expanded use of telehealth has been a critical option that both optimizes resources and minimizes community spread by reducing contact between clinicians and patients. However, to further build upon these gains, we ask CMS to issue additional relief below:

- **Telehealth. As with other providers, we ask that home health providers be allowed to count telehealth encounters as in-person visits for payment purposes.** Importantly, this relief would provide another layer of protection to both



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home health staff and patients. Home health staff when treating Medicare beneficiaries are currently still required to engage in some amount of in-person care.

- Documentation. Currently, physicians or non-physician-practitioners evaluating potential home health patients are still required to sign written orders and certify in writing that patients are eligible for home care. Unfortunately, COVID-19-related stresses have greatly reduced their availability for these functions. In fact, in some areas, even electronic signatures are extremely difficult to obtain. As such, **we ask for the flexibility to use verbal orders and eligibility certifications in order to expedite safe and timely discharges from hospitals to homecare.**

CMS's extensive efforts to support providers urgently responding to the COVID-19 emergency are greatly valued. The AHA looks forward to continuing to partner with the agency in the fight against this pandemic. In doing so, we would appreciate your consideration of these requests. If you have any questions concerning this request, please feel free to contact me, or have a member of your team contact Rochelle Archuleta, director of policy, at rarchuleta@aha.org.

Sincerely,

/s/

Thomas P. Nickels
Executive Vice President