



CALIFORNIA ASSOCIATION
FOR NURSE PRACTITIONERS

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September 30, 2021

Cassie Dunham
Acting Deputy Director
Center for Health Care Quality
California Department of Public Health

Re: Advanced Practice Providers Prescribing Home Health Services

Dear Ms. Dunham:

This letter is written to bring your attention to recent confusion regarding the continuing ability for Advanced Practice Providers (APPs) in CA to Order, Certify and Re-Certify Home Health Services. A July 16, 2021 All Facilities Letter ([AFL 20-72.1](#)), put out by the Department of Public Health stating that APP ability to Order, Certify and Re-Certify Home Health will expire with the end of the declared Public Health Emergency (PHE) on September 30th, 2021.

The issue of concern is specifically written under the section entitled **Services and Staffing #4**. It states that effective September 30, 2021, the PHE waiver allowing Nurse Practitioners and other APPs to Order, Certify and Re-Certify Home Health will end due to the expiration of the declared Public Health Emergency (PHE). However, the Sections of Title 22 the CDPH has used to reference Home Health Services in the AFL (CCR sections 74697 (a) (4) and 74701 (a)) have *already* been updated to include APPs as ordering providers.

Home Health services are vital to our community dwelling older adults. The ability for our patients to receive timely admissions to these skilled services in their homes is often the difference between their ability to remain at home or be hospitalized unnecessarily.

We are specifically asking CDPH to clarify that regulations have been updated to permanently apply the AFL letter #4 waivers, allowing APPs to order, certify and re-certify Home Health consistent with the Federal Regulations.

Thank you very much for your help in correcting this matter so our patients continue to receive the coordinated Home Health benefits they are entitled to. Please feel free to call Surani Kwan, DNP, FNP with any questions or concerns, 707-321-5406 or suranihl@sonic.net

Sincerely,

A handwritten signature in black ink, appearing to read "P. Gurney", is written in a fluid, cursive style.

Patti Gurney, MSN, NP-BC
President
California Association for Nurse Practitioners

Garrett Chan, PhD, RN, APRN, FAEN, FPCN, FNAP, FCNS, FAANP, FAAN
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Deborah Wolff Baker

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