



CALIFORNIA ASSOCIATION
FOR NURSE PRACTITIONERS

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September 29, 2021

Lisa Murawski
Chief, Benefits Division
Department of Health Care Services

Re: Advanced Practice Providers prescribing Home Health Services

Dear Ms. Murawski:

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. Nurse Practitioners, Physician Assistants, and Clinical Nurse Specialists are trained and capable within their education, training, licensure, and experience to Order, Certify, and Re-Certify Skilled Home Health services.

Effective October 1, 2020, [State Plan Amendment \("SPA"\) 20-035](#) allows these APPs to Order, Certify, and Recertify Home Health Services after the Public Health Emergency ends. However, there is conflicting guidance from Department of Health Care Services ("DHCS") regulations and provider manuals, which may imply that APPs may not Order, Certify, and Recertify Home Health Services.

The language in [22 CCR § 51337](#) has not yet been updated to reflect that Home Health Services can be ordered by APPs and other legally authorized Practitioners within their Scope of Practice.

"(a) Home health agency services are covered as specified below when prescribed by a physician and provided at the home of the beneficiary in accordance with a written treatment plan which the physician reviews every 60 days."

Furthermore, the Provider Manual was updated in August 2020 with guidance in conflict with SPA 20-035. Page 1 of home health section of the Provider Manual still requires Home Health Services to be ordered by a physician contrary to SPA 20-035 allowing APPs to order Home Health Services.

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 request that DHCS urgently review 22 CCR § 51337 and the [Provider Manual](#) (updated August 2020), and issue guidance directing providers to rely on SPA 20-035 until the regulation and the Provider Manual can be updated reflect SPA 20-035. This will allow APPs to function within their Scope of Practice and order Home Health Services for Californians with Medi-Cal coverage.

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,



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