

Expedited Clearance of PRA Package OMB 0938-1135

Currently, there are certain payment requirements for covered Part A or Part B home health services. Specifically, to receive payment for such services, the provider's claim must meet all of the following requirements:

- The ordering/certifying physician must be identified by his or her legal name and National Provider Identifier (NPI) on the claim.
- The ordering/certifying physician must be enrolled in Medicare in an approved status or have validly opted-out of the Medicare program.

Section 3708 of the CARES Act expanded who may certify the need for home health services to include Nurse Practitioners (NPs), Clinical Nurse Specialists (CNSs), and Physician Assistants (PAs) in order to provide additional flexibilities to respond effectively to the serious public health threats posed by the spread of the 2019 Novel Coronavirus (COVID-19).

The interim final rule Additional Policy and Regulatory Revisions in Response to the COVID-19 Public Health Emergency (RIN: 0938-AU32) includes a provision to allow NPs, CNSs and PAs to certify the need for home health services to align with the CARES Act. This, in turn, would require these three non-physician practitioner (NPP) types to be enrolled in or opted-out of Medicare to certify such services. Physicians and practitioners complete the Medicare Enrollment Application - Registration For Eligible Ordering and Referring Physicians and Non-Physician Practitioners (OMB control number: 0938-1135) if they are enrolling in Medicare solely to order, or certify certain Medicare items and services. Based on our internal data, we generally estimate that approximately 5,000 currently unenrolled or non-opted out NPs, CNSs, and PAs will elect to enroll in or opt-out of Medicare solely for the purpose of certifying home health services in the initial year and 1,000 new NPs, CNSs, and PAs each year will enroll in or

opt-out of Medicare for the same purpose. These additional burden estimates require a revision to the currently approved information collection request (ICR).

As the current COVID-19 crisis expands, there is a need for flexibility of health care services provided to Medicare beneficiaries. Expanding who can certify home health services reduces burden on the physicians, who up until now, were the only provider type eligible to certify home health services. The expedited clearance of the Medicare Enrollment Application is critical to ensuring beneficiaries receive access to needed care while reducing the burden on physicians. Therefore, we ask that OMB consider the emergency clearance process to allow NPs, CNSs and PAs to certify the need for home health services to align with the CARES Act.