

April 2, 2020

Charles Friedrich
CMCS| Medicaid and CHIP Operations Group (MCOG) Office of the Regional Administrator
Atlanta Federal Center
61 Forsyth Street, SW, Suite 4T20
Atlanta, Georgia 30303-8909

Via email transmittal to Charles.Friedrich@cms.hhs.gov

Dear Mr. Friedrich,

On March 23, 2020 NCHA submitted a request for a blanket waiver, on behalf of its hospital and health system members, in anticipation of the effects of 2019 Novel Coronavirus (2019-nCoV). NCHA appreciates your consideration of that request and remains available for any questions you may have.

In addition to the request made in that letter, NCHA now requests, on behalf of our hospital and health system members, for an additional waiver to permit licensed acute care hospitals to “swing” beds in order to provide skilled nursing care to patients that cannot be discharged to community nursing homes. Current blanket waivers permit expansion of acute care capacity in on-campus or off-campus sites, but do not specifically permit the provision or reimbursement of skilled nursing care in a licensed acute care bed or other currently approved location for that care.

This waiver is necessary because skilled nursing facilities have initiated testing requirements to avoid contagion in their facilities, with results not becoming available for 5 -7 days. Patients must therefore be cared for onsite and at the hospital’s expense. This is especially troublesome for North Carolina’s rural hospitals, which are in an extremely difficult financial position due to COVID-19 related costs and the loss of elective procedures.

We thank you for your consideration of this addendum to our waiver request. If you have any questions, please contact me (slawler@ncha.org, 252-258-5228) or Cody Hand, Senior Vice President (chand@ncha.org, 919-793-8318) or Mike Vicario, Vice President of Regulatory Affairs (mvicario@ncha.org, 919-491-5898).

Sincerely,



Stephen J. Lawler
President and CEO
North Carolina Healthcare Association

cc: Dave Richard, NC DHHS

