

# Home Health Conditions of Participation

Visiting Nurse Associations of America  
Joy M. Cameron and Robert Wardwell  
January 19, 2017

# Overview

- Background on CoPs
- Timing
- Changes – Section Review
- Request for Feedback on Implementation
- Q&A
- Resources

# Background on CoPs

- Conditions of Participation (CoPs)
- Updated after almost 20 years
- Some variations from proposed rules

# Timing

- Official released on January 13, 2017
- Implementation date of July 13, 2017
  - Except for Performance Improvement Projects reflecting scope, complexity and past performance of HHA and document projects, reason for conducting, and measurable progress – January 13, 2018.

# Section Overview

# Definitions

- Branch Office
- Clinical Note
- In Advance
- Parent Home Health Agency
- Primary Home Health Agency
- Proprietary Agency
- Public Agency
- Representative
- Subdivision
- Summary Report
- Supervised Practical Training
- Verbal Order



# Release of Patient Identifiable OASIS Information

- Ensure confidentiality of all patient data

# Reporting OASIS Information

- Encoding and Transmitting OASIS Data
- Accuracy of Encoded OASIS Data
- Transmittal of OASIS Data
- Data Format



# Patient Rights

- Notice of Rights
- Exercise of Rights
- Rights of the Patient
- Transfer and Discharge
- Investigation of Complaints
- Accessibility

# Comprehensive Assessment of Patients

- Initial Assessment Visit
- Completion of the Comprehensive Assessment
- Content of the Comprehensive Assessment
- Update of the Comprehensive Assessment

# Care Planning Coordination of Services, and Quality of Care

- Plan of Care
- Conformance to Physician Orders
- Review and Revision to Plan of Care
- Coordination of Care
- Written Information to Patient

# Quality Assessment and Performance Improvement

- Program Scope
- Program Data
- Program Activities
- Performance Improvement Projects
- Executive Responsibilities

# Infection Prevention and Control

- Prevention
- Control
- Education

# Skilled Professional Services

- Provision of Services by Skilled Professionals
- Responsibilities of Skilled Professionals
- Supervision of Skilled Professional Assistants

# Home Health Aide Services

- Home Health Aide Qualifications
- Content and Duration of Home Health Aide Classroom and Supervised Practical Training
- Competency Evaluation
- In-Service Training
- Qualification for Instructors Conducting Classroom and Supervised Practical Training
- Eligible Training and Competency Evaluation Organizations
- Home Health Aide Assignments and Duties
- Supervision of Home Health Aides
- Individuals Furnishing Medicaid Personal Care Aide-Only Services Under a Medicaid PC Benefit



# Compliance with Federal, State, and Local Laws and Regulations Related to the Health Safety of Patients

- Disclosure of Ownership and Management Information
- Licensing
- Laboratory Services



# Emergency Preparedness

- Emergency Plan
- Policies and Procedures
- Communication Plan
- Training and Testing
- Integrated Health Care Systems

# Organization and Administration of Services

- Governing Body
- Administrator
- Clinical Manager
- Parent-Branch Relationship
- Services Under Arrangement
- Services Furnished
- Outpatient Physical Therapy or Speech-Language Pathology Services
- Institutional Planning



# Clinical Records

- Contents of the Clinical Record
- Authentication
- Retention of Records
- Protection of Records
- Retrieval of Clinical Records

# Personnel Qualifications

- Administrator
- Audiologist
- Clinical Manager
- Home Health Aide
- Licensed Practical (Vocational) Nurse
- Occupational Therapist
- Occupational Therapy Assistant
- Physical Therapist
- Physical Therapist Assistant
- Physician
- Registered Nurse
- Social Work Assistant
- Social Worker
- Speech Language Pathologist



Visiting Nurse Associations of America

# Feedback on Implementation

# Questions and Answers

# Resources

- Webinar – recorded for later access
- PowerPoint
- Link to the CMS Regulations with Comments
- Link to the Federal Register version of the Regulations
- Descriptive Overview of Changes
- List of Changes from Proposed to Final
- Side by Side (previous regulations / new regulation) \*

# Joy Cameron

Vice President, Policy and Innovation

[jcameron@vnaa.org](mailto:jcameron@vnaa.org)

571-527-1536



Visiting Nurse Associations of America