

AAAHC has implemented the transformational *1095 Strong, quality every day* philosophy, a call-to-action that equips ambulatory leaders with the best of what they need to operationalize quality practices. The *1095 Strong* initiative centers on providing accreditation tools, resources, and relevant education to bring meaningful value to organizations and promote compliance with the Standards, all 1,095 days of the accreditation term.

As the COVID-19 crisis evolves, we are committed to delivering an exceptional *1095 Strong* experience by improving health care quality through accreditation.

Question	Answer
How can my organization assist with the emergency response in our state?	<p>There are several ways that you can assist with supporting your state with the emergency response:</p> <ol style="list-style-type: none"> 1. Temporary closure or limited operations 2. Enroll as a hospital 3. Contract with a hospital <p>Note, that your plan should be consistent with state and local health authority's emergency plan. Ensure that you work with authorities and communicate with local hospitals about any direction the authorities have provided.</p> <p>States may provide direction on scope and services, particularly if you are enrolling as a hospital. Partnership agreements with hospitals may have flexibility, it depends on ownership, hospital and community need.</p>
Are we required to notify AAAHC of what we do?	<p>For service scope changes including temporary closures, suspension, and expansion of services <u>directly associated with COVID-19</u>, requirements for submission of the AAAHC Change Notification is waived until further notice.</p> <p>If you contract with a hospital or become a hospital, please notify AAAHC by sending a quick email to notify@aaahc.org.</p> <p>For all facilities, if your primary contact changes during this time, email AAAHC at notify@aaahc.org as we want to make sure we can reach you.</p>
How will temporary closure affect my CCN?	<p>If a health care facility temporarily closes because it only provides elective cases/non-emergency treatment or appointments consistent with CDC and CMS recommendations, CMS would not view this as a cessation of business.</p> <p>This will not be deemed as a voluntary termination of the Medicare agreement under §416.35(a)(3).</p>
What are the requirements for resuming normal operations following temporary closure?	<p>Facilities that temporarily close <u>due to COVID-19</u> are expected to resume operations or voluntarily terminate their Medicare enrollment <u>within 30 days</u> of the public health emergency being lifted. Facilities needing to temporarily shut down or limit operations should post notices at their business as well as on public facing websites and social media platforms during this emergency.</p>
What if we decide to lease equipment?	<p>When leasing equipment, consult legal counsel and consider the following:</p> <ul style="list-style-type: none"> • Description of equipment, including serial number and condition • Return of damaged or loss of equipment • Repairs and maintenance



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How do we enroll as a hospital?	To begin enrolling as a hospital, any Medicare-certified ASC must first notify and submit a signed attestation statement to the Medicare administrative contractor (MAC) serving its jurisdiction. The MAC will review and send the attestation to an applicable CMS regional office, which will evaluate the ASC’s compliance with state survey standards.
Is there an initial certification survey if we enroll as a hospital?	ASCs do not need to undergo an onsite survey for temporary hospital enrollment, but the CMS regional office may authorize a state survey at a later date.
Does our CCN change if we enroll as a hospital?	Each approved ASC will receive a hospital CMS certification number . The regional office will then notify the MAC that the ASC is permitted to enroll as a hospital, and enrollment will take effect on the date of subsequent MAC approval. At the end of the public health emergency, ASCs will have their hospital CMS certification numbers terminated, their hospital billing privileges deactivated, and their ASC billing privileges reinstated. However, at any time, centers can revert back to ASC status by notifying the MAC.
How quickly can I get providers enrolled with Medicare?	CMS MACs have toll-free hotline numbers available to you, and waivers have been applied to expedite enrollment.
Can we operate concurrently with hospital and ASC patients?	No. Once the hospital CCN is assigned to the ASC, its ASC CCN and billing privileges will be temporarily deactivated.
What is the effective date of hospital enrollment?	The effective date of the ASC’s hospital enrollment is the date the attestation is accepted by the MAC. (Typically 2-day approval)
Where can I find the Conditions of Participation and applicable waivers?	Conditions of Participation http://federal.elaws.us/cfr/title42.part482 State Operations Manual (SOM) Appendix A https://www.cms.gov/media/423601 COVID-19 Emergency Declaration Blanket Waivers for Health Care Providers https://www.cms.gov/files/document/covid19-emergency-declaration-health-care-providers-fact-sheet.pdf
Where can I learn more about CMS policies and memos related to the pandemic?	CMS Memos: Updates for State Surveyors and Accrediting Organizations https://www.cms.gov/medicare/quality-safety-oversight-general-information/coronavirus
What happens when I convert back to an ASC?	At the end of the public health emergency, ASCs will have their hospital CMS certification numbers terminated, their hospital billing privileges deactivated, and their ASC billing privileges reinstated.

Question	Answer
What are the Stark Law implications?	<p>CMS issued a nationwide Stark Law waiver permitting physician-owners to refer patients to converted ASCs, so long as the arrangement is made for COVID-19-related purposes. However, physician-owners should consider federal and state fraud and abuse laws.</p> <p>August 3: HHS OIG says “Ditto” to HHS Blanket Stark Waivers for Purposes of the Anti-Kickback Statute</p>
What are AAAHC expectations for organizations during the COVID-19 pandemic?	<p>Consistent with AAAHC Standards of compliance, all organizations across all settings should remain vigilant about practices that impact employee and patient safety and the quality of care delivered.</p> <ul style="list-style-type: none"> • All AAAHC accredited organizations are subject to survey consistent with accreditation policies—even those in containment areas. • Health care organizations should heighten focus on infectious disease protocols, including preparing for treating patients with COVID-19. • CDC provides the most consistent source of information on preventing the spread of this virus. We encourage you to regularly monitor the CDC website for updates and guidelines: https://www.cdc.gov/coronavirus/2019-ncov/index.html.
What if our organization does not have PPE or low supplies?	<p>Organizations should monitor the CDC website for information and resources related to the use of PPE for COVID-19 (CDC Resources for Health Care Facilities: https://www.cdc.gov/coronavirus/2019-ncov/healthcare-facilities/index.html). Organizations should also coordinate with other suppliers, healthcare coalitions, or state and local public health authorities on availability of PPE.</p> <p>Specific guidance on PPE is also available through the CDC PPE page: https://www.cdc.gov/coronavirus/2019-ncov/hcp/healthcare-supply-ppe-index.html</p>
Are there specific management guidelines for COVID-19?	<p>On March 7, 2020 the CDC released interim guidelines. All organizations are encouraged to review their protocols for alignment with the CDC guidelines on management of potential exposure.</p> <p>Interim U.S. Guidance for Risk Assessment and Public Health Management of Healthcare Personnel with Potential Exposure in a Healthcare Setting to Patients with Coronavirus Disease (COVID-19).</p> <p>Pandemic Preparedness Resources.</p> <p>Health Care Professionals FAQs</p>

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Are guidelines available for the management of PPE?	<p>The CDC provides guidance with a series of strategies or options to optimize supplies of N95 masks. Consider the principles outlined throughout these strategies and how they might apply broadly to supply. These guidelines include a checklist and guidance on conventional and contingency capacity strategies and crisis alternative strategies.</p> <p>Strategies for Optimizing the Supply of N95 Respirators.</p> <p>The FDA has updated their FAQs. Specifically, this allows that cloth gowns that will not be used in a sterile field, such as surgery, can be reused if they are laundered in enzymatic detergent or per the organization's SOP.</p> <p>https://www.fda.gov/medical-devices/personal-protective-equipment-infection-control/faqs-shortages-surgical-masks-and-gowns</p>
Does AAAHC have resources to support organizations regarding COVID-19?	<p>Please review our COVID-19 resources page at: https://www.aaahc.org/what-you-need-to-know/</p> <p>We encourage you to check the AAAHC website regularly as resources are updated regularly based on current changes to guidance and regulatory mandates.</p>
Are recordings of AAAHC webinars available online?	<p>Yes, all AAAHC webinars will be available online within a week of the live program. Please visit https://www.aaahc.org/what-you-need-to-know/ on the AAAHC website.</p>
How can I find out more information from the CDC?	<p>For more information on COVID-19, use this CDC link: https://www.cdc.gov/coronavirus/2019-nCoV/summary.html</p>
Are you allowed to turn away certain cases in this situation? Or do you need to take any and all cases requested to be done at the facility?	<p>In some cases, facilities are allowed to turn away cases, especially in circumstances where the acuity of the patient may be better served in a full hospital. However, it is dependent on the type of arrangement you have, direction from state and, or, contract with hospital.</p>
If the ASC is not accredited with the CMS how will long will the process take?	<p>CMS has expedited review and approval processes for CCNs and AAAHC has Early Option Surveys listed as priority. If you are seeking an initial CCN survey and intend to support state and community emergency efforts, submit your application at: https://application.aaahc.org/Default.aspx?ReturnUrl=%2f or email notify@aaahc.org with an urgent request.</p>
What is the name of the ASC that has their policies posted online?	<p>The following ASCs have posted their policies online:</p> <p>Omaha Medical Center, NE P&P's Molina Healthcare Guidelines UW Health Policies and Protocols Harvard Pilgrim Pathways Seattle Children's Clinical Resources and Pathways</p> <p>These links are provided as references, this list does not represent AAAHC endorsement.</p>