



**HAWAII HEALTH SYSTEMS**  
C O R P O R A T I O N

*"Touching Lives Every Day"*

## ***COMPLIANCE ALERT 12-01***

### ***CMS Delays Supervision Requirements for Outpatient Therapeutic Services in Critical Access Hospitals for CY 2012***

Previously, the Centers for Medicare & Medicaid Services (CMS) instructed all of its Medicare contractors not to evaluate or enforce the physician supervision requirements for therapeutic services provided to outpatients in Critical Access Hospitals from January 1, 2010 to December 31, 2010, and then again through CY 2011. On November 1, 2011, CMS announced it was extending this instruction an additional year through CY 2012. If enforced, this would have required CAHs to have physicians available to step in for all therapeutic services provided by CAHS which would cause logistical and financial strain on CAHs that typically have limited physician services on site.

"CMS continues to expect the hospitals covered under this notice to fulfill all other Medicare program requirements when providing services to Medicare beneficiaries and when billing Medicare for those services. While CMS is instructing contractors not to enforce the supervision requirements for outpatient therapeutic services in these hospitals for CY 2010-2012, we continue to emphasize quality and safety for services provided to all patients in these facilities."

**Source:**

[https://www.cms.gov/HospitalOutpatientPPS/Downloads/CMS\\_1504FC\\_OPPTS\\_2011\\_FR\\_Physician\\_Supervision\\_Nonenf\\_Notice.pdf](https://www.cms.gov/HospitalOutpatientPPS/Downloads/CMS_1504FC_OPPTS_2011_FR_Physician_Supervision_Nonenf_Notice.pdf)