

CORONAVIRUS DISEASE 2019 (COVID-19)

Temporary Enrollment of Ambulatory Surgery Centers as Hospitals



Audience: Provider Enrollment Colleagues, Reimbursement Leadership, Revenue Excellence Leadership

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COVID-19 Temporary Relief Measures Allow Ambulatory Surgery Centers (ASCs) to Enroll as Hospitals to Provide Inpatient and Outpatient Hospital Services

The Centers for Medicare & Medicaid Services (CMS) has enacted a number of measures to provide Provider Enrollment relief during COVID-19. One of these measures will allow ASCs to be temporarily enrolled as hospitals to provide inpatient and outpatient hospital services.

In order to qualify for temporary transition to a hospital, an ASC must meet the non-waived hospital conditions of participation related to nursing services, pharmaceutical supplies, infection control and respiratory services.

Enrolling an ASC as a Temporary Hospital

Notify the Medicare Administrative Contractor (MAC) of the ASC's intent to function as a hospital by submitting a completed and signed attestation (see attached, page 4).

No onsite survey will be required. Instead, the Regional Office (RO) will review the ASC survey activity from the prior three years. If no immediate jeopardy deficiencies are cited (IJs) or cited IJs have been removed by normal survey process, the RO will approve the temporary conversion, assign the ASC a hospital CMS Certification Number (CCN), and send a tie-in notice to the MAC.

Once the hospital CCN is assigned to the ASC, its ASC CCN and billing privileges will be temporarily deactivated.

The effective date of the ASC's hospital enrollment is the date the attestation is accepted by the MAC.

Once the public health emergency passes, the RO will terminate the ASC's temporary hospital CCN and it will automatically revert to its previous status as an ASC.

Stark Law Blanket waivers issued March 30th extend to physician owners of any ASC which temporarily becomes a physician-owned hospital. The waivers can be found on Trinity Health's COVID-19 site at: <http://www.trinity-health.org/workfiles/covid-19/cms-blanket-waivers-508c.pdf>.

The guidance provided to the state survey agencies by CMS is in the document below.



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conversion of ASC to