

Orders around ARNPs and PAs ordering home health services

Bottom Line: During the public health emergency (PHE), ARNPs in WA are authorized under both Medicare and Medicaid to order home health services. PAs in WA cannot yet order home health services, since there is a DOH WAC that prohibits it. DOH has indicated it will be issuing an emergency rule to allow PAs to order home health services shortly, but we haven't seen it yet. Once that has been issued, PAs will be able to order home health services for both Medicare and Medicaid during the PHE. In the long term, the CARES Act authorizes PAs and ARNPs to order home health services under Medicare, but there will need to be a fix to allow the same under Medicaid.

Federal Rules: During PHE, CMS has authorized ARNPs and PAs to order home health services. This applies to both Medicare and Medicaid. (See [here](#) (CMS FAQs for Home Health) and [here](#) (interim final rule).) Under [section 3708 of the CARES Act](#), Congress made the same fix for Medicare only, so ARNPs and PAs will be authorized to order these services, even after the end of the PHE. There would need to be similar legislation or rulemaking by CMS to authorize a long-term fix for Medicaid on the federal side.

State Rules: Two HCA WACs ([182-543-0500](#) and [182-551-2040](#)) prohibit PAs and ARNPs from ordering home health. But HCA has already issued [an emergency rule](#) allowing ARNPs and PAs to order home health services. DOH has a WAC ([WAC 246-335-510](#)) that prohibits PAs from ordering home health has not yet issued an emergency rule, but we have been told we should be seeing it any day now. So, in WA, ARNPs are authorized to bill for home health services but PAs are not yet authorized to do so.