

# MEMORANDUM

**SUBJECT:** Community Care Policy Clarification CCAD 02002, CBA/HCSS 02001

**TO:** Regional Administrators  
Regional Directors  
Long Term Care Services

**FROM:** Becky Beechinor  
Assistant Deputy Commissioner  
Long Term Care Services  
State Office W-511

**DATE:** February 7, 2002

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## **Policy Question 1:**

Is a Community Based Alternatives (CBA) Home and Community Support Services (HCSS) agency required to provide a client with a physician ordered flu shot? The flu shot was included on the plan of care from the physician to the HCSS agency.

## **Policy Clarification 1:**

Yes. An HCSS agency must provide the immunization in accordance with HCSSA standard §97.22 (b) (2) (B) "The appropriate health care personnel shall perform services as specified in the plan of care". HCSS agencies contracted to provide CBA are required to deliver services under the Licensed Home Health category of licensure.

## **Policy Question 2:**

Can an HCSS agency carry out orders for skilled services signed by a physician assistant (PA) or advanced practice nurse (APN)?

## **Policy Clarification 2:**

Yes. All skilled treatment must be ordered by a medical doctor (MD), doctor of osteopathy (DO), or a practitioner. A PA and APN fall under the Practitioner definition found in HCSSA Standard §97.2 (62).

If you have any questions on this letter, please contact your contract manager.

*signature on file*

Becky Beechinor

BB:ck