



STATE OF MICHIGAN

DEPARTMENT OF COMMUNITY HEALTH  
LANSING

JENNIFER M. GRANHOLM  
GOVERNOR

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DIRECTOR

February 13, 2007

Mr. Jeff Towns, President/CEO  
Michigan Hospice and Palliative Care Organization  
5123 West Saint Joseph Highway, Suite 204  
Lansing, Michigan 48917

Dear Mr. Towns:

The purpose of this letter is to restate a longstanding policy clarification regarding the nurse aide training and competency evaluation requirement for hospice aides that provide hospice services in nursing homes.

Please be aware that the code of Federal Regulations Conditions of Participation at Sections 42 CFR 418.94 and 42 CFR 484.36 provides clarification relative to training for hospice aides/home health aides and competency requirements.

Also, the Medicare Hospice Conditions of Participation at section 418.56(e) which establish certain standards for in-patient services furnished under arrangements with hospice, require that the hospice retain responsibility for appropriate hospice training of the personnel who provide care under the agreement. Personnel are not required to meet the requirements that apply to individuals furnishing services in an in-patient facility.

Specifically, an aide who provides services on behalf of a Medicare certified hospice is only required to comply with the home health aide competency requirements at Section 42 CFR 484.36 regardless of the patient's place of residence. If the patient resides in a Long-term Care facility, it is not necessary for the hospice aide to meet the LTC nurse aide competency requirements also.

I hope this information is helpful. However, if you should have further questions regarding this matter, please call us at 517-241-3830.

Sincerely,

Howard Schaefer, Survey Supervisor  
Hospice, HHA, and OPT Team  
Hospitals and Specialized Health Services

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