



**Health Facility Licensing and Certification**

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## Hospital Dialysis Options

The Oregon Health Authority's Health Care Regulation & Quality Improvement section regulates Hospitals and End-Stage Renal Disease Treatment Facilities (ESRDs) across Oregon. As a result of the COVID-19 pandemic Oregon Hospitals have had difficulty securing outpatient dialysis placements for discharging patients and have had an increase in patients coming to the hospital for dialysis treatment. Below are options for hospitals addressing limited outpatient dialysis resources.

### Hospital @ Home

Hospitals that have a temporary license to provide [Acute Care Hospital at Home \(H@H\)](#) services may provide dialysis treatment to H@H patients. The patients receiving care at home as H@H inpatients may go to the hospital building for regular dialysis treatments and then return home to continue their H@H care. Hospitals interested in adding H@H services can apply for a [Hospital License Temporary Space for COVID-19 Instructions and Application \(pdf\) - COVID](#) and then request a Center for Medicare & Medicaid Services (CMS) [waiver](#) in order to receive reimbursement for this service.

### Special Purpose Renal Dialysis Facility (SPRDF)

#### SPRDF Process:

1. Apply for State License: To secure the state licensure referenced on the SPRDF checklist the hospital should submit a [Hospital License Temporary Space for COVID-19 Instructions and Application \(pdf\) - COVID](#) requesting a change of use for existing dialysis service location to begin providing both inpatient and outpatient service in the location.
2. Apply to CMS through MAC: Hospitals that would like to temporarily provide outpatient dialysis services should apply for Special Purpose Renal Dialysis Facility (SPRDF) approval through their Medicare Administrative Contractor (MAC). CMS has created a helpful [checklist of SPRDF requirements](#). It is not necessary to apply for a CMS waiver to provide outpatient dialysis because this option is provided in the [CMS § 1135 blanket waiver](#); applying through the MAC is the way hospitals opt-in to this blanket waiver provision.
3. The attached checklist also requires completion of the [CMS-3427 form](#).

**Resources:**

The CMS [Guidance for Infection Control and Prevention of Coronavirus Disease 2019 \(COVID-19\) in dialysis facilities \(Revised\) \(QSO-20-19-ESRD-REVISED\)](#) provides additional information about SPRDF requirements as does the [CMS State Operations Manual § 2272](#).

**Additional areas of concern:**

**Limitation of Services:** Hospitals may request that outpatient services be limited to patients who are being discharged from the hospital; this request specification is new and it is possible that hospitals setting up an SPRDF might be expected to serve any ESRD patients in the community. It is unclear whether the MAC will be able to provide information about limiting services. The hospital will still be limited by their capacity to provide dialysis services.

**Additional Staffing:** Hospitals may use regular staffing request channels to request dialysis nurses and hemodialysis technicians? in order to increase hospital dialysis capacity.

**Patient Prioritization for ESRD Services:** Some ESRDs have indicated they will de-prioritize taking new patients if those patients are already receiving regular dialysis elsewhere, even if their treatment location is an SPRDF. Hospitals are encouraged to work with local ESRDs to ensure that SPRDF patients remain a priority for the ESRD so that their time receiving outpatient dialysis at the hospital would be limited.

**Hospital Contracted Providers:** Hospitals that contract with ESRDs to provide hospital dialysis services should address any contract issues related to providing outpatient services, capacity, and additional staffing providing by the hospital with their contracted provider.

## **ESRD Services**

For information on current ESRD operations and closures see the OHA's [Dialysis Facility Modified Operations and Closures \(pdf\) - COVID](#) memo.

If you need this material in an alternate format,  
please call (971) 673-0540 or TTY (711).