



# LOUISIANA HOSPITAL ASSOCIATION

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March 16, 2020

Stephen Russo, JD  
Interim Secretary  
Louisiana Department of Health  
PO Box 629  
Baton Rouge, LA 70821-0629

Dear Secretary Russo:

On behalf of our member hospitals and health systems, the LHA appreciates the efforts of the Department during this unprecedented event involving the COVID-19 virus. As we continue our efforts to assist hospitals during this difficult time, we have compiled a list of items of which we believe some state-level flexibility, in concert with the available federal flexibility, will greatly benefit hospital efforts as they prepare for the potential surge in patients and respectfully request the following:

1. Suspend all hospital licensing rules related to bed capacity so that hospitals may accept patients in greater numbers than dictated by their licensed bed capacity.
2. Suspend all necessary state statutes and rules to allow healthcare providers employed by a hospital and licensed and in good standing in another state to practice in Louisiana.
3. Suspend all hospital transfer regulations and requirements. Allow hospitals to rapidly discharge, transfer, or receive patients, provided that reasonable measures are in place to protect the health and safety of the patients.
4. Suspend any regulatory provisions that require verbal orders to be dated, timed, and authenticated within certain timeframes by the prescriber or another practitioner who is responsible for the care of the patient. A related federal condition of participation requires verbal orders to comply with state law. See 42 C.F.R. § 482.24.
5. Temporarily suspend discharge planning requirements and designated caregiver requirements to facilitate expedited discharge.
6. Temporarily suspend routine inspections and on-site investigations of hospitals, except for surveys related to COVID-19 and initial surveys necessary for facilities to open or add space.
7. Temporarily suspend all hospital and non-hospital building/space requirements to provide for patient care, provided sufficient safety and comfort is provided for patients and staff. This will ensure that all units and service locations can be utilized for acute care, and that care is paid for as acute care.
8. Allow flexible nurse staffing in temporary patient care units.

Obviously due to the rapidly-changing environment in which we are all operating, more requests could be forthcoming as events unfold. We appreciate the Department's consideration of these items and are happy to discuss further and answer any questions. As always, you have our commitment to continue to work alongside the Department to provide the best care possible to Louisiana's population during this event.

Sincerely,

Paul A. Salles

A handwritten signature in blue ink that reads "Paul A. Salles". The signature is written in a cursive style with a long horizontal flourish at the end.

President & CEO

CC: Cecile Castello  
Kim Humbles  
Erin Campbell