



**Topic:** Non-Physician Practitioners and Home Health Orders  
**Contact:** Carol Eastburg, RN, Health Facilities Inspector II, (702) 622-9380, [ceastburg@health.nv.gov](mailto:ceastburg@health.nv.gov)  
**Date:** April 17, 2020  
**To:** Nevada Home Health Agencies

---

The purpose of this technical bulletin is to notify the affected health care providers and the public of recently waived requirements that **temporarily** allow Advanced Practice Registered Nurses (APRN), Clinical Nurse Specialists (CNS) and Physician Assistants (PA) to sign orders for home health during the Public Health Emergency (PHE) brought about by the COVID-19 Pandemic.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act includes a provision for “Improving Care Planning for Medicare Home Health Services.” This provision allows for APRNs, CNSs and PAs to order and sign for home health care services. As amended, an individual no longer has to be solely under the care of a physician.

During the COVID-19 PHE, Nevada will **temporarily** waive the requirement for only a physician to write and sign orders for home health agencies that are **certified by the Centers for Medicare and Medicaid Services (CMS)**.

**Once the current PHE is declared to be over, the requirement for the physician’s signature will resume for CMS-certified home health agencies in Nevada.**

The non-physician practitioner must be practicing in accordance with state law and be appropriately supervised. The non-physician practitioner can establish the patient’s plan of care and certify the patient’s eligibility. This will allow the non-physician practitioner to sign the plan of care and interim orders directly and eliminate the extra step of having the supervising physician sign orders that were properly given by the non-physician practitioner.

Along with their signature, the non-physician practitioner **must include** the name of their supervising physician. The order should be signed by the APRN, CNS or PA, followed by the supervising physician’s name and credentials of either DO, DPM or MD as shown in this **example**:

*John Doe*, APRN, for Jane Doe, MD

In addition, your agency’s governing body should prepare a clear policy for staff to follow while the **temporary** waiver is in effect. The policy should include a requirement to have a statement either on the referral sheet or the Plan of Care that indicates “During the COVID-19 Public Health Emergency, APRNs, CNSs and PAs may order home health care services and sign the Plan of Care, along with any necessary subsequent orders.”

**Remember, once the current PHE is declared to be over, the requirement for the physician’s signature will resume for CMS-certified home health agencies in Nevada.**

**[Click here to read the State Operations Manual §484 on the CMS website.](#)**

For more information, contact Carol Eastburg, RN, Health Facilities Inspector, at (702) 622-9380, or [ceastburg@health.nv.gov](mailto:ceastburg@health.nv.gov).



Lisa Sherych, Administrator  
Division of Public and Behavioral Health



Ihsan Azzam, Ph.D., M.D.  
Chief Medical Officer