



STATE OF HAWAII
DEPARTMENT OF HEALTH
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Testimony in SUPPORT of SB2272
RELATING TO HOME HEALTH LICENSING.

SENATOR DONOVAN M. DELA CRUZ, CHAIR
SENATE COMMITTEE ON WAYS AND MEANS

Hearing Date and Time: MON, March 2, 2026 @ 10:31 am

Room Number: 211

1 **Fiscal Implications:** No impact to the Department of Health (Department).

2 **Department Position:** The Department supports this measure and offers comments and
3 proposed amendments.

4 **Department Testimony:** The Office of Health Care Assurance (OHCA) provides the following
5 testimony on behalf of the Department. OHCA supports this measure which would allow a
6 Home Health Agency to demonstrate compliance with all licensing inspections required by the
7 State through accreditation or certification by any accreditation or certification organization
8 approved by the Centers for Medicare and Medicaid Services (CMS).

9 **Offered Amendments:**

10 Page 2, lines 7-8:

11 **SECTION 2. §321-91 Program of home health services (b) ~~recognized~~ approved** by the
12 Centers for Medicare and Medicaid Services may be used to demonstrate the home
13 health agency's compliance with...

14 and page 3, lines 10-11:

- 1 **SECTION 2. §321-91 Program of home health services (b)** accreditation organization or a
- 2 certification organization ~~recognized~~ **approved** by the Centers for Medicare and Medicaid
- 3 Services...
- 4 Thank you for the opportunity to testify on this measure.



March 2, 2026 at 10:31 am
Conference Room 211

Senate Committee on Ways and Means

To: Chair Donovan M. Dela Cruz
Vice Chair Sharon Y. Moriwaki

From: Paige Heckathorn Choy
Vice President, Government Affairs
Healthcare Association of Hawaii

Re: **Testimony in Support**
SB 2272, Relating to Home Health Licensing

The Healthcare Association of Hawaii (HAH), established in 1939, serves as the leading voice of healthcare on behalf of 170 member organizations who represent almost every aspect of the healthcare continuum in Hawaii. Members include acute care hospitals, skilled nursing facilities, home health agencies, hospices, assisted living facilities and durable medical equipment suppliers. In addition to providing access to appropriate, affordable, high-quality care to all of Hawaii's residents, our members contribute significantly to Hawaii's economy by employing over 30,000 people statewide.

Thank you for the opportunity to submit testimony in **support** of this measure, which would allow home health agencies to rely on certification by an approved accrediting organization to meet state licensure requirements. Seventeen states and the District of Columbia currently allow this practice, and Hawaii state law currently allows this arrangement for hospitals and skilled nursing facilities (SNFs).

Like hospitals and SNFs, home health agencies must be licensed at both the federal and state level. The Centers for Medicare and Medicaid Services (CMS) uses accrediting organizations to survey home health agencies' adherence to federal Medicare Conditions of Participation (CoPs). If a home health agency passes the survey successfully and is certified by an accrediting organization, then they can participate in and receive reimbursement from the Medicare and Medicaid programs.

As noted, many states use a home health agency's certification by a CMS-approved accrediting organization to "deem" the agency in compliance with state or local licensing requirements. These states acknowledge that allowing an accrediting organization's certification of a home health agency to be recognized for state or local licensure purposes preserves high standards of care while avoiding unnecessary duplication. We believe this is also acceptable in Hawaii, since accrediting organizations conduct comprehensive surveys that evaluate patient safety, clinical

quality, staffing qualifications, infection control, governance, and continuous performance improvement. Importantly, home health agencies that maintain accreditation are still subject to oversight from OHCA, which would still be able to inspect home health agencies as needed.

We believe that allowing home health agencies to meet state licensure requirements using their accrediting organization certification will promote more efficient use of limited state resources while maintaining high standards of care and enabling state regulators to focus their efforts on other important enforcement activities.

Thank you for the opportunity to support this important measure.