



STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
STATE COUNCIL ON DEVELOPMENTAL DISABILITIES
'A'UNIKE MOKU'ĀPUNI NO KA NĀ KĀWAI KULA
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February 6, 2026

The Honorable Senator Joy A. San Buenaventura, Chair
Senate Committee on Health and Human Services
The Thirty-Third Legislature
State Capitol
State of Hawai'i
Honolulu, Hawai'i 96813

Dear Chairs San Buenaventura, and Committee Members:

SUBJECT: SB2272 RELATING TO HOME HEALTH LICENSING

The Hawai'i State Council on Developmental Disabilities (DDC) submits testimony **in SUPPORT of SB2272** which, authorizes the Department of Health to accept accreditation from an accreditation organization or a certification organization recognized by the Centers for Medicare and Medicaid Services as demonstration that a licensed home health agency is in compliance with all licensing inspections required by the State.

The Hawai'i State Council on Developmental Disabilities supports this measure because individuals with intellectual and developmental disabilities frequently rely on home health services to remain in their homes and communities and to avoid unnecessary hospitalization or institutional placement. Allowing the Department of Health to recognize accreditation from Centers for Medicare and Medicaid Services-approved organizations aligns state oversight with existing federal quality and safety standards while reducing duplicative administrative burdens on providers. This approach helps stabilize the home health system, which is especially important for individuals with complex medical and support needs and for aging family caregivers.

The Council also supports the continued authority of the Department to investigate complaints and conduct validation surveys to ensure patient safety and accountability.

For these reasons, the Hawai'i State Council on Developmental Disabilities **supports SB2272.**

Thank you for the opportunity to submit testimony.

Daintry Bartoldus
Executive Administrator



**STATE HEALTH PLANNING
AND DEVELOPMENT AGENCY**
DEPARTMENT OF HEALTH - KA 'OIHANA OLAKINO

JOSH GREEN, MD
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII

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February 4, 2026

TO: SENATE COMMITTEE ON HEALTH AND HUMAN SERVICES
Senator Joy A. San Buenaventura, Chair
Senator Angus L.K. McKelvey, Vice Chair
Honorable Members

FROM: John C. (Jack) Lewin, MD, Administrator, SHPDA, and Sr. Advisor to
Governor Josh Green, MD on Healthcare Innovation

RE: **SB 2272 -- Relating to Home Health Licensing**

HEARING: Friday, February 6, 2026 @ 01:00 pm; Conference Room 225

POSITION: SUPPORT with COMMENTS

TESTIMONY:

SHPDA fully supports this measure which authorizes the Department of Health (DOH) to accept accreditation from an accreditation or certification organization recognized by the Centers for Medicare and Medicaid Services (CMS) as a demonstration that a licensed home health agency is in compliance with all licensing inspections required by the State. It further specifies conditions under which a home health agency may be exempt from licensing inspection of an ongoing basis. It also requires that reports of survey and accreditation and certification letter to be public information.

This administrative simplification action will save the state currently required resources and staffing activities without in any way sacrificing quality or patient safety. It is long overdue.

Thank you for hearing SB 2272.

Mahalo for the opportunity to testify.

■ -- Jack Lewin, MD, Administrator



February 6, 2026 at 1:00 pm
Conference Room 225

Senate Committee on Health and Human Services

To: Chair Joy A. San Buenaventura
Vice Chair Angus L.K. McKelvey

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).

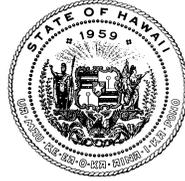
Like hospitals and SNFs, home health agencies must be licensed at both the federal and state level. The Centers for Medicare and Medicaid Services (CMS) uses accrediting organizations to survey home health agencies' adherence to federal Medicare Conditions of Participation (CoPs). If a home health agency 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.



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

SENATOR JOY A. SAN BUENAVENTURA, CHAIR
SENATE COMMITTEE ON HEALTH AND HUMAN SERVICES

Hearing Date and Time: FRI, February 6, 2026, @ 1:00 pm

Room Number: 225

- 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.