



**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.



**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

**KENNETH S. FINK, MD, MGA, MPH**  
DIRECTOR OF HEALTH  
KA LUNA HO'ŌKELE

**JOHN C. (JACK) LEWIN, MD**  
ADMINISTRATOR

February 26, 2026

**TO:** SENATE COMMITTEE ON WAYS AND MEANS  
Senator Donovan M. Dela Cruz, Chair  
Senator Sharon Y. Moriwaki, 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:** Monday, March 2, 2026 @ 10:31 am; Conference Room 211

**POSITION:** SUPPORT with COMMENTS

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Testimony:

SHPDA strongly supports SB 2272 with comments.

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 resourcing 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, SHPDA



**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.

**SB-2272**

Submitted on: 2/27/2026 8:16:08 PM

Testimony for WAM on 3/2/2026 10:02:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Johnnie-Mae L. Perry	Individual	Support	Written Testimony Only

Comments:

I, Johnnie-Mae L. Perry, Support

2272 SB RELATING TO HOME HEALTH LICENSING.