



Herb B. Kuhn
President and CEO
P.O. Box 60
Jefferson City, MO 65102

March 17, 2021

The Honorable Mike Parson
Governor of Missouri
Missouri State Capitol
201 West Capitol Avenue, Room 216
Jefferson City, MO 65101-1556

Dear Governor Parson:

Thank you again for the thorough update you provided on yesterday's biweekly hospital call on the status of the COVID-19 response in the state. Your update about the continuing response and improvement to the COVID-19 pandemic — as evidenced through ongoing declines in case counts and increasing supply of vaccine — is great news. We appreciate your ongoing leadership and focus on the many issues we have faced over the past 12 months.

We also appreciate your comments that now is not the time to reverse course and we must stay vigilant and deploy all critical mitigation efforts. The Centers for Disease Control and Prevention also is urging caution as we return to normalcy through continued use of face masks, social distancing and other mitigation activities that have served us to date.

This is sound advice and strong leadership, particularly as we collectively watch three ongoing or upcoming events over the next several weeks — spring break season, Easter and the U.K. variant.

Your initial emergency declaration and subsequent extensions paved the way for hospitals and health care providers to effectively combat the pandemic so we could arrive at this juncture. As you shared on yesterday's call, your administration is reviewing the current emergency declaration. With that declaration set to expire on March 31, MHA, on behalf of its member hospitals, requests an extension of the emergency declaration and attendant waivers.

I am attaching a spreadsheet of currently effective waivers, which have been critical for the health care industry to adjust as necessary to address supply chain and other operational delays, increased use of telemedicine, patient surge and the fallout from delayed care. These waivers are set to expire along with the emergency declaration. We believe these waivers should be extended concurrent with any extension of the emergency declaration so that hospitals can continue to adapt to the changing circumstances of the pandemic. Should an increase in gatherings or a variant cause a surge in the short term, these waivers will allow the affected hospitals to quickly and adequately respond.

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Many of these waivers are necessary to effectuate those granted by the Department of Health and Human Services and the Centers for Medicare & Medicaid Services. HHS has indicated it likely will extend its public health emergency declaration through the end of 2021 and give health care providers a 60-day wind down period before terminating any waivers. We propose a similar process in Missouri — preserve the status quo in the short term, while allowing us to work with state officials to identify waivers we can begin to wind down and those needed to continue to ensure harmony between federal and state law.

MHA's members appreciate your leadership in ensuring health care providers have the tools necessary to continue the fight against COVID-19 and thank you for your consideration of this request.

Sincerely,



Herb B. Kuhn
President and CEO

hbk/ds

attachment



The Missouri Hospital Association advocated with various state and federal agencies to waive requirements that impede hospitals' ability to rapidly respond to the spread of COVID-19. Executive Order 20-04 was issued where the governor granted departments the authority to temporarily waive or suspend any statutory requirement or administrative rule or regulation under the director's purview, upon approval of the Governor's Office. Please consult the relevant agency with questions about processes and specific applications.

Use the links below to navigate to a specific spreadsheet within this document.

WAIVERS BY TOPIC:

[Health Care Workers](#)

[Hospital Licensure & COPs](#)

[Telemedicine](#)

[Pharmacy](#)

[EMS & Patient Transfers](#)

[Medicaid](#)

[Reimbursement](#)

[Home Health, Hospice & Other](#)

| Agency Responsible | Description of Waiver | Duration of Waiver | Statute or Regulation | Application | Status | Notes |
|----------------------------|--|--------------------------------|--|-----------------------------|---------|---|
| HEALTH CARE WORKERS | | | | | | |
| State Waivers | | | | | | |
| Board of Healing Arts | Suspension of reciprocity requirements to allow physicians licensed in other states to practice in Missouri | 3/31/2020 - 3/31/2021 | 334.043, RSMo 20 CSR 2150-2.030 | Physicians | GRANTED | |
| Board of Healing Arts | Allows retired/inactive physicians to practice without reapplying for licensure | 3/25/2020 - 3/31/2021 | 334.002.3 and .4, 334.110, RSMo 20 CSR 2150-2.153(9) | Physicians | GRANTED | |
| Healing Arts/Nursing | Suspension of geographic limits for APRNs | 3/26/2020 - 3/31/2021 | 334.104(5)(b), RSMo 20 CSR 2150-5.100(2)(B) 20 CSR 2200-4.200(2)(B)(2) | APRN | GRANTED | |
| Healing Arts/Nursing | Suspension of requirement that APRN work under physician supervision for one month | 4/2/2020 - 3/31/2021 | 20 CSR 2150-5.100(2)(C) 20 CSR 2200-4.200(2)(C) | APRN | GRANTED | |
| Healing Arts/Nursing | Suspension of requirements for physician chart review | 4/2/2020 - 3/30/2021 | 334.104.3(9), RSMo 20 CSR 2200-2.200(4)(E) | APRN | GRANTED | <i>Does not waive requirements relating to review of charts involving prescription of controlled substances</i> |
| Board of Healing Arts | Suspension of geographic limits for assistant physicians | 3/31/2020 - 3/30/2021 | 334.037.2(5)(b), RSMo 334.037.3(1), RSMo 20 CSR 2150-2.240(1)(A) and (B) | Assistant Physicians | GRANTED | |
| Board of Healing Arts | Suspension of geographic limits for physician assistants | 3/31/2020 - 3/31/2021 | 334.735.9(5)(b), RSMo and 20 CSR 2150-7.135(8)(C) | Physician Assistants | GRANTED | |
| Board of Healing Arts | Suspension of requirement that PA work under physician supervision for one month | 3/31/2020 - 3/31/2021 | 334.735.13, RSMo and 20 CSR 2150-7.135(7) | Physician Assistants | GRANTED | |
| Board of Healing Arts | Suspension of requirements for physician chart review for PAs | 3/31/2020 - 3/31/2021 | 334.725.9(8), RSMo and 20 CSR 2150-7.135(10) | Physician Assistants | GRANTED | |
| Board of Healing Arts | Allows anesthesiologist assistants licensed in other states to practice in Missouri | 3/31/2020 - 3/31/2021 | 334.412, RSMo | Anesthesiologist Assistants | GRANTED | |
| Board of Healing Arts | Allows inactive or retired AAs to practice without reapplying for licensure | 3/31/2020 - 3/31/2021 | 334.408, 334.410, RSMo and 20 CSR 2150-9.090 and 20 CSR 2150-9.100 | Anesthesiologist Assistants | GRANTED | |
| Board of Healing Arts | Allows perfusionists licensed in other states to practice in Missouri | 3/31/2020 - 3/31/2021 | 20 CSR 2150-8.030 | Perfusionists | GRANTED | |
| Board of Healing Arts | Allows applicants for PT license to submit unofficial transcripts if licensed in another state | 4/3/2020 - 3/31/2021 | 20 CSR 2150-3.010(3) | Physical Therapists | GRANTED | |
| Board of Healing Arts | Allows physical therapists licensed in other states to practice in Missouri | 3/31/2020 - 3/31/2021 | 334.540, RSMo and 20 CSR 2150-3.040(1) | Physical Therapists | GRANTED | |
| Board of Healing Arts | Allows physical therapist whose temporary license expires during period of emergency to continue to practice | 3/31/2020 - 3/31/2021 | 20 CSR 2150-3.050(5)(E) and (6) | Physical Therapists | GRANTED | |
| Board of Healing Arts | Allows inactive or retired physical therapists to practice without reapplying for licensure | 3/31/2020 - 3/31/2021 | 20 CSR 2150-3.053 20 CSR 2150-3.057 20 CSR 2150-3.066 | Physical Therapists | GRANTED | |
| Board of Healing Arts | Allows physical therapy assistants licensed in other states to practice in Missouri | 3/31/2020 - 12/30/2020/31/2021 | 334.660, RSMo and 20 CSR 2150-3.120 | Physical Therapy Assistants | GRANTED | |
| Board of Healing Arts | Allows inactive or retired physical therapy assistants to return to practice | 3/31/2020 - 3/31/2021 | 334.685, RSMo 20 CSR 2150-3.153 | Physical Therapy Assistants | GRANTED | |

| Agency Responsible | Description of Waiver | Duration of Waiver | Statute or Regulation | Application | Status | Notes |
|------------------------------------|---|---|--|--------------------------------|----------------|--|
| HEALTH CARE WORKERS | | | | | | |
| State Waivers | | | | | | |
| | | | 20 CSR 2150-3.165 | | | |
| Board of Healing Arts | Allows PTA whose temporary license expires during period of emergency to continue to practice | 3/31/2020 - 3/31/2021 | 20 CSR 2150-3.150(4) and (5)(E) | Physical Therapy Assistants | GRANTED | |
| DHSS | Extend timeframe for UAP to obtain required classroom time by 90 days | 4/2/2020 - 3/31/2021 | 19 CSR 30-20.125 | Unlicensed Assistive Personnel | GRANTED | |
| Board of Nursing | Allows nurse graduates who graduated on or after 12/16/19 and who have not previously taken the NCLEX and not been denied a license to practice as a graduate nurse pending the results of heir first licensing exam or for 180 days after graduation, whichever occurs first | 3/23/2020 - 3/31/2021 (waiver covers individuals who graduate before that date) | 20 CSR 2200-4.020(1)(G) and 20 CSR 2200-4.020(3) | Nursing students | GRANTED | |
| Board of Nursing | Extend unexpired temporary permits for an additional 6 months | 3/23/2020 - 3/31/2021 | 20 CSR 2200-4.020(6) | Nurses | GRANTED | |
| Missouri Board of Respiratory Care | Waives certain provisions of application for licensure - NBRC verification will be obtained via website by the board; license verification from other states will be accepted via email; fingerprinting requirements are waived. | 4/7/2020 - 3/31/2021 | 20 CSR 2255-2.010 | Respiratory Care Practitioners | GRANTED | <i>Effective 11-24-20: The Board clarified that staff will verify the applicant's out of state license with the National Board for Respiratory Care directly from the NBRC (instead of requiring the applicant to request that information be sent to the board from NBRC) and that the fingerprint requirement is waived, allowing the fingerprinting and additional verifications to be collected at a later date. Board staff indicated that approvals can be issued the same day they receive applications and have been being issued expeditiously.</i> |
| Missouri Board of Respiratory Care | Individuals whose license has been expired/lapsed for less than four (4) years may submit reinstatement renewal forms via email with renewal and delinquent fees being collected at a later date. | 4/7/2020 - 3/31/2021 | 20 CSR 2255-2.060 | Respiratory Care Practitioners | GRANTED | |

| Agency Responsible | Description of Waiver | Duration of Waiver | Statute or Regulation | Application | Status | Notes |
|---|---|-----------------------|--|----------------------------------|---------|---|
| HOSPITAL LICENSURE/CONDITIONS OF PARTICIPATION | | | | | | |
| State Waivers | | | | | | |
| DHSS | Ability to place patients in nonlicensed care sites | 3/20/2020 - 3/31/2021 | 19 CSR 30-20.015(2) | All Hospitals | GRANTED | |
| DHSS | Suspension of construction standards for off-campus care sites | 3/20/2020 - 3/31/2021 | 19 CSR 30-20.030 | All Hospitals | GRANTED | Notify DHSS of existence of and location of site |
| DHSS | Use of LTC units beds for acute patients | 3/20/2020 - 3/31/2021 | 19 CSR 30-20.050 | All Hospitals | GRANTED | |
| DHSS | Suspension of rule on visiting hours in LTC units | 3/19/2020 - 3/31/2021 | 19 CSR 30-20.050(2)(C) | All Hospitals | GRANTED | |
| DHSS | Suspend requirement to provide notice of rights and responsibilities for individuals in LTC unit | 3/20/2020 - 3/31/2021 | 19 CSR 30-20.050(8)(B) | All Hospitals | GRANTED | |
| DHSS | Suspend requirements to provide notice of services available in LTC unit | 3/20/2020 - 3/31/2021 | 19 CSR 30-20.050(8)(C) | All Hospitals | GRANTED | |
| DHSS | Allows hospitals to exceed licensed bed capacity and use medical surge beds for intensive care | 3/20/2020 - 3/31/2021 | 19 CSR 30-20.015(5) | All Hospitals | GRANTED | |
| DHSS | Waiver of transfer/dishcharge standards in LTC units | 3/20/2020 - 3/31/2021 | 19 CSR 30-20.050(8)(E) | All Hospitals | GRANTED | |
| DHSS | 6 month extension of all hospital licenses expiring during declared emergency | 3/20/2020 - 3/31/2021 | 19 CSR 30-20.015(5) | All Hospitals | GRANTED | |
| DHSS | Suspension of diversion rules | 3/19/2020 - 3/31/2021 | 19 CSR 30-20.092 | Hospitals/EMS | GRANTED | |
| DHSS | Suspension of all routine hospital survey activity and on-site investigations of hospitals, except for surveys authorized by CMS | 4/2/2020 - 3/31/2021 | 197.100, 197.080; RSMo; 19 CSR 30-20.015(8)(A) | All Hospitals | GRANTED | Will conduct surveys only as necessary to address public health and safety/address immediate jeopardy situations (authority from CMS) |
| DHSS | Grants an additional 90 days to renew trauma, stroke and STEMI designations | 4/2/2020 - 3/31/2021 | 19 CSR 30-40.420(2)(A) 19 CSR 30-40.720(2)(A) and (B) 19 CSR 30-40.750(2)(A) and (B) | Trauma, stroke and STEMI centers | GRANTED | |
| DHSS | Suspends requirements relating to designation reviews for trauma centers | 4/2/2020 - 3/31/2021 | 19 CSR 30-40.420(2)(G) 19 CSR 30-40.420(2)(J) | Trauma centers | GRANTED | |
| DHSS | Suspends requirements relating to designation reviews for stroke centers | 4/2/2020 - 3/31/2021 | 19 CSR 30-40.720(2)(D)2 19 CSR 39-40.720(2)(F) and (G) | Stroke centers | GRANTED | |
| DHSS | Suspends requirements relating to designation reviews for STEMI centers | 4/2/2020 - 3/31/2021 | 19 CSR 30-40.750(2)(D)2 19 CSR 30-40.750(2)(F) and (G) | STEMI centers | GRANTED | |
| DHSS | Extends trauma, stroke or STEMI designation obtained through alternate designation process until private certifying organization can conduct review | 4/2/2020 - 3/31/2021 | 19 CSR 30-40.420(3) 19 CSR 30-40.720(3) 19 CSR 30-40.750(3) | Trauma, stroke and STEMI centers | GRANTED | |

| Agency Responsible | Description of Waiver | Duration of Waiver | Statute or Regulation | Application | Status | Notes |
|--------------------------------|--|-----------------------|---|----------------------|---------|---|
| TELEMEDICINE/TELEHEALTH | | | | | | |
| State Waivers | | | | | | |
| DCI | Waives enforcement against carriers who reimburse telehealth providers licensed in another state; strongly encourages carriers to authorize out-of-network telehealth services | 3/26/2020 - 6/15/2020 | 376.1900, 191.1145.3, 376.1900.8 | Insurance carriers | ISSUED | Education only; does not have force or effect of law |
| Healing Arts | Suspends licensure reciprocity requirements | 3/25/2020 - 3/31/2021 | 334.108.1 and .4, RSMo and 20 CSR 2150-2.030 | Physicians | GRANTED | Allows physicians licensed outside Missouri to provide telehealth services in the state |
| Governor/Healing Arts/MHD | Allow telephone consult to constitute exam | 3/18/2020 - 3/31/2021 | Section. 191.1146, 334.108, 376.1900, 208.670 | Telehealth providers | GRANTED | |
| | Additional Resources: | | | | | |
| | Medicare Telemedicine Health Care Provider Fact Sheet | | | | | |
| | General Provider Telehealth and Telemedicine Toolkit | | | | | |
| | Long-Term Care Nursing Homes Telehealth and Telemedicine Toolkit | | | | | |
| | ESRD Provider Telehealth and Telemedicine Toolkit | | | | | |
| | Medicare Telehealth FAQs | | | | | |
| | Temporary Telehealth Guidelines | | | | | |
| | FAQs on Availability and Usage of Telehealth Services Through Private Health Insurance Coverage in Response to Coronavirus Disease 2019 (COVID-19) | | | | | |

| Agency Responsible | Description of Waiver | Duration of Waiver | Statute or Regulation | Application | Status | Notes |
|----------------------|--|-----------------------|------------------------------------|---|----------------|--|
| PHARMACY | | | | | | |
| State Waivers | | | | | | |
| BNDD | Allows for set up and operation of temporary health care facilities without a registration | 3/31/2020 - 3/31/2021 | 195.030.6, RSMo | Pharmacies | GRANTED | |
| BNDD | Allows pharmacies to dispense an emergency supply of controlled substances to a patient if original dispensing pharmacy is closed or unable to fill the prescription due to the State of Emergency | 3/31/2020 - 3/31/2021 | Section 195.060.1, RSMo | Pharmacies | GRANTED | <i>May dispense 14-day supply; must make good faith efforts to verify prescription and that originally dispensing pharmacy is closed</i> |
| BNDD | Extends deadline for annual inventories due during declared emergency by 120 days | 3/31/2020 - 3/31/2021 | 19 CSR 30-1.042(3) | Pharmacies | GRANTED | |
| Board of Pharmacy | Waives licensure requirements for pharmacists, technicians and pharmacies licensed in other states | 3/23/20 - 3/31/2021 | 338.020, 338.013 and 338.220, RSMo | Pharmacists, Technicians and Pharmacies | GRANTED | |
| Board of Pharmacy | Allows pharmacies to dispense an emergency supply of medication if original dispensing pharmacy is closed or unable to fill the prescription due to the State of Emergency | 3/20/2020 - 3/31/2021 | 338.200.1(2), RSMo | Pharmacies | GRANTED | <i>Does not apply to controlled substances; must make good faith effort to verify the prescription</i> |
| Board of Pharmacy | Allows pharmacies to dispense up to 30-day supply of emergency medication during the State of Emergency | 3/20/2020 - 3/31/2021 | 338.200.2(1) | Pharmacies | GRANTED | <i>Use smallest unit of use available for medications that exceed a 30-day supply</i> |
| Board of Pharmacy | Allows pharmacy tech or intern to dispense when pharmacist is not physically present due to emergency if certain conditions are met | 3/20/2020 - 3/31/2021 | 20 CSR 2220-2.010(1)(A) | Pharmacies | GRANTED | <i>Medication must have been previously verified and approved by pharmacist; dispensing necessary for patient safety or to provide emergency relief; and dispensing without pharmacist's presence has been approved by pharmacist in advance</i> |
| Board of Pharmacy | Allows pharmacist to use technology to remotely verify final product if certain conditions are met | 3/20/2020 - 3/31/2021 | 20 CSR 2220-2.010(1)(B) | Pharmacies | GRANTED | <i>Physical verification cannot be promptly performed by pharmacist; prompt dispensing is in the best interest of patient health/safety; technology is sufficient to properly verify product and tech or intern is supervised in compliance with proposed rule 20 CSR 2220-2.710 published 3/16/20</i> |
| Board of Pharmacy | Pharmacies engaged in sterile compounding may accept Aseptic Technique Skill Assessment results from another pharmacy for the same staff member | 3/20/2020 - 3/31/2021 | 20 CSR 2220-2.200(10)(B) | Pharmacies | GRANTED | <i>Ensure techs are trained on proper technique</i> |
| Board of Pharmacy | Allows for Class-J shared services without a permit if necessary to prevent interruptions in patient care | 3/20/2020 - 3/30/2021 | 20 CSR 2220-2.650; 338.220, RSMo | Pharmacies | GRANTED | <i>Must comply with 20 CSR 222-2.650 except: common database and written contract not required</i> |
| Board of Pharmacy | Allows use of technicians and interns to assist with non-dispensing from off-site location | 3/20/2020 - 3/31/2021 | 20 CSR 2220-6.055(6) | Pharmacies | GRANTED | |

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| PHARMACY | | | | | | |
| State Waivers | | | | | | |
| Board of Pharmacy | Allows technicians and interns to perform remote data entry from home or off-site location | 3/20/2020 - 3/31/2021 | 20 CSR 2220-2.700(1) 20 CSR 2220-6.055(6) | Pharmacies | GRANTED | Must comply with proposed rule 20 CSR 2220-2.725 published 3/16/20 |
| Board of Pharmacy | Allows pharmacists to renew their Notification of Intent (NOI) to immunize by protocol or to administer medication by medical prescription order without a current CPR certificate, if the pharmacist cannot update their CPR certification before renewing in 2020. | 7/7/2020 - 3/31/2021 | 20 CSR 2220-6.040(8); 20 CSR 2220-6.050(7)(A) | Pharmacists | GRANTED | |
| Board of Pharmacy | Pharmacists may renew their NOI to immunize by protocol in 2020 without the required immunization continuing education (CE), if the pharmacist is unable to complete the required immunization CE before renewing. | 7/7/2020 - 3/31/2021 | 20 CSR 2220-6.050(7)(B) | Pharmacists | GRANTED | |
| Board of Pharmacy | Reduces the number of required pharmacist continuing education (CE) hours for the 2020 renewal period from thirty (30) hours to fifteen (15) hours. The required fifteen (15) CE hours must have been earned between November 1, 2018, and October 31, 2020 (CE must be completed before a renewal is submitted). | 7/7/2020 - 3/31/2021 | 20 CSR 2220-7.080(2) | Pharmacists | GRANTED | |
| Board of Pharmacy | Allows pharmacy to compound certain commercially available products for hospitalized patients in accordance with FDA temporary policy. | 5/1/2020 - 3/31/2021 | 20 CSR 2220-2.400(9) and 20 | Pharmacies | GRANTED | FDA Policy can be found here |
| Board of Pharmacy | Allows intern pharmacists to earn more than forty-eight (48) intern hours per week, if needed (subject to school and preceptor approval/ requirements). | 7/7/2020 - 3/31/2021 | 20 CSR 2220-7.025(4)(C) | Intern Pharmacists | GRANTED | Must comply with school and preceptor requirements |
| Board of Pharmacy | Allows pharmacy compounding medication for hospitalized patients pursuant to temporary FDA policy to release Risk Level 3 medication without end product testing results | 5/1/2020 - 3/31/2021 | 20 CSR 2220-2.200(14) | Pharmacies | GRANTED | FDA Policy can be found here |
| Board of Pharmacy | Allow distribution of compound preparations by hospital pharmacies without patient-specific prescription to treat COVID-19 patients or assist other hospitals unable to provide the compounding services | 4/13/2020 - 3/31/2021 | 20 CSR 2220-2.400(12) | Pharmacies | GRANTED | |
| Board of Pharmacy | Allow pharmacists to substitute albuterol inhalers with other albuterol inhalers listed in the FDA Orange Book with different equivalency evaluation code. | Exp. 3/31/2021 | 20 CSR 2220-3.011(3); 338.056, RSMo | Pharmacies | GRANTED | |
| Board of Pharmacy | Allows Missouri licensed pharmacies to use entities licensed as pharmacy in another U.S. State or territory to assist with providing pharmacy services during the State of Emergency. | Exp. 3/31/2021 | 338.220, RSMo | Pharmacies | GRANTED | |

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| PHARMACY | | | | | | |
| State Waivers | | | | | | |
| Board of Pharmacy | Extends pharmacy practice to allow a current and active Missouri licensed pharmacists to order and administer COVID-19 vaccines as authorized by HHS | Exp. 3/31/2021 | 338.010, RSMo | Pharmacists | GRANTED | |
| Board of Pharmacy | Allows Missouri Licensed pharmacies to use individuals licensed/registred as pharmacy technicians in another U.S. state or territory to provide pharmacy services during the State of Emergency. | Exp. 3/31/2021 | 338.013, RSMo | Pharmacy Technicians | GRANTED | |
| Board of Pharmacy | Extends practice of pharmacy to allow current and active Missouri licensed pharmacists to provide childhood vaccines as authorized by HHS during the COVID pandemic. | Exp. 3/31/2021 | 338.010, RSMo | Pharmacists | GRANTED | |
| BNDD | Allow practitioners whose primary practice location is outside the state of Missouri, who are temporarily practicing in Missouri during the state of emergency, to not register with the Missouri Department of Health and Senior Services in order to dispense or prescribe controlled substances | Exp. 3/31/2021 | 195.030.2, RSMo | Practitioners | GRANTED | |
| BNDD | Delays implementation of electronic prescribing requirements for Schedule II, III and IV controlled substances. | | 195.080, RSMo. | Prescribers | GRANTED | |

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| EMS/FIRST RESPONDERS | | | | | | |
| State Waivers | | | | | | |
| DHSS | Allows EMS to develop approved protocols to triage 911 calls and prioritize transport | 3/19/2020 - 3/31/2021 | 19 CSR 30-40.309(2)(B) | EMS | GRANTED | |
| DHSS | Allows hospitals to deviate from diversion plans to more effectively move patients to alternate care sites | 3/19/2020 - 3/31/2021 | 19 CSR 30-20.092 | Hospitals | GRANTED | |
| DHSS | Allows DHSS and LPHAs to notify public safety agencies, including 911 dispatch, EMS, law enforcement and fire protection of the address of individuals known to be under a request or order for quarantine. | 3/25/2020 - 3/31/2021 | 192.067, RSMo and 19 CSR 20-20.020(10) | EMS | GRANTED | |
| DHSS | Allows hospitals to notify first responders of potential exposure to COVID-19, regardless of whether the individual has been admitted to the hospital | 4/14/2020 - 3/31/2021 | 19 CSR 20-20.090(2) | EMS | GRANTED | |
| DHSS | Grants various ambulance services an additional 90 days after conclusion of emergency to apply for license renewal | 4/29/2020 - 3/31/2021 | 19 CSR 30-40.308(1)(A) 19 CSR 30-40.309(1)(A) 19 CSR 30-40.331(1)(A) & (B) 19 CSR 30-40.333(1)(A) 19 CSR 30-40.528(1)(A) | EMS | GRANTED | |
| DHSS | Waived to the extent the provisions require air ambulance services to be inspected after an initial or relicensure application is received by the Department in order for the Department to verify the air ambulance service meets statutory and regulatory requirements. | 4/29/2020 - 3/31/2021 | 19 CSR 30-40.308(1)(c) | EMS | GRANTED | |
| DHSS | Waived to the extent the provisions require ground ambulance services to be inspected after an initial or relicensure application is received by the Department in order for the Department to verify the ground ambulance service meets statutory and regulatory requirements. | 4/29/2020 - 3/31/2021 | 19 CSR 30-40.309(1)(C) and (D) | EMS | GRANTED | |
| DHSS | Expands scope of practice for EMT-Basics to include administering COVID-19 immunizations via the intramuscular route | 3/3/2021 - 3/31/2021 | 19 CSR 30-40.342(2)(B) | EMS | GRANTED | |
| DHSS | Waives to the extent necessary to allow the scope of practice for EMT-Basics includes performing the COVID-19 antibody test through a finger stick blood draw process mirroring the blood glucose analysis process currently allowed in an EMT-Basic's scope of practice | 10/9/2020 - 3/31/2021 | 19 CSR 30-40.342(2)(B) | EMS | GRANTED | |

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| EMS/FIRST RESPONDERS | | | | | | |
| State Waivers | | | | | | |
| DHSS | Waives to the extent necessary to allow Advanced Emergency Medical Technicians, Emergency Medical Technician-Paramedics, Emergency Medical Technician-Basics, and Emergency Medical Responders, who do not have authority to vaccinate individuals with a COVID-19 vaccine within the State of Missouri, to do so under certain conditions. | 2/9/2021 - 3/31/2021 | 190.142.5, RSMo | EMS | GRANTED | |
| DHSS | Allows for physician assistants to be able to provide online medical control, instructions by radio, telephone, or other means of direct communications, and offline medical control through supervision by treatment protocols, case review, training, and standing orders for treatment. Also, allows for Emergency Medical Technicians in Missouri to be able to perform patient care that is ordered by a physician assistant. Finally, allows for a physician assistant to be in attendance with the patient in the patient compartment at all times and this physician assistant shall count as a crew member on an ambulance. The collaborative practice mileage restriction of seventy-five (75) miles shall not apply for physician assistants when they are providing care to the patient in the patient compartment during transport to a hospital beyond seventy-five (75) miles. | 4/9/2020 - 3/31/2021 | 190.100(24), 190.142.4(2), Sections 190.094.1 and 2, 190.105.2 RSMo, and 20 CSR 2150-7.135(8)(C) | EMS and Physician Assistants | GRANTED | |
| DHSS | Grants EMS training entities and emergency medical response agencies an additional time after conclusion of emergency to renew license; suspends inspections of entities during state of emergency | 4/29/2020 - 3/31/2021 | 19 CSR 30-40.331(B)(C) | EMS | GRANTED | |
| PATIENT TRANSFERS TO POST ACUTE CARE | | | | | | |
| State Waivers | | | | | | |
| DHSS | Waiver suspending pre admission screening and annual resident review (PASRR) Section 1919(e)(7) of the Act allows Level I and Level II assessments to be waived for 30 days. All new admissions can be treated like exempted hospital discharges. After 30 days, new admissions with mental illness (MI) or intellectual disability (ID) should receive a Resident Review as soon as resources become available. | 4/2/2020-End of federal emergency | State process letter | Hospital/LTCF | GRANTED | |

| Agency Responsible | Description of Waiver | Duration of Waiver | Statute or Regulation | Application | Status | Notes |
|----------------------|--|---|---|--------------------|---------|---|
| MEDICAID | | | | | | |
| State Waivers | | | | | | |
| DSS MO HealthNet | Consistent with the federal Families First Coronavirus Response Act, the Department of Social Services will not terminate eligibility for any Medicaid participant unless the individual requests a voluntary termination or ceases to be a resident of the state | 3/25/2020 - 4/21/2021 | 208.065, 208.990.2, and 208.990.3 RSMo | Medicaid providers | GRANTED | |
| DSS MO HealthNet | Allows MMAC to expedite Medicaid provider enrollment | 3/1/2020 through the end of the federal emergency declaration | 13 CSR 65-2.020(5) and 13 CSR 65-2.020(9) | Medicaid providers | GRANTED | |
| DSS MO HealthNet | Medicaid coverage extended for elective tubal ligations rescheduled due to COVID-19 | 3/25/2020 - 3/31/2021 | | Medicaid providers | GRANTED | |
| DSS MO HealthNet | Suspends requirement to maintain pharmacy signature log | 3/20/2020 - 3/31/2021 | 13.11.B of the MOHealthNet Pharmacy Provider Manual | Medicaid providers | GRANTED | |
| DSS MO HealthNet | Waives several requirements of the Private Duty Nursing Program (RN reviews, provider qualifications and certificaions, plan of care updates | 3/13/2020 - 3/31/2021 | | Medicaid providers | GRANTED | |
| DSS MO HealthNet | MO HealthNet to auto-approve CT chest scans with COVID-19 diagnosis; all approvals will be valid for 90 days | 3/1/2020 - 3/31/2021 | | Medicaid providers | GRANTED | |
| DSS MO HealthNet | Registered Behavioral Technicians may provide ABA services if they meet all requirements but certification test. | 3/20/2020 - 3/31/2021 | | Medicaid providers | GRANTED | |
| DSS MO HealthNet | Additional albuterol inhalers added as preferred products | 3/20/2020 - 3/31/2021 | | Medicaid providers | GRANTED | |
| DSS MO HealthNet | Teledentistry services authorized for patients at home | 3/23/2020 - 3/31/2021 | | Medicaid providers | GRANTED | |
| DSS MO HealthNet | Coverage of COVID-19 testing for participants with Extended/Uninsured Women's Health Services benefits. | 3/1/2020 - 4/21/2021 | | Medicaid providers | GRANTED | Providers who perform other services on the same date as the COVID-19 test for these participants must bill for the COVID-19 tests on a separate claim in order to be reimbursed. |
| DSS MO HealthNet | Private Duty Nursing may be provided by graduate registered or licensed practical nurses. | 7/30/2020 - 4/21/2021 | 42 CFR 440.80(a) | Medicaid Providers | GRANTED | |
| DSS MO HealthNet | Suspends for up to a year the requirement for a face-to-face encounter prior to coming on home health services | 7/30/2020 - 4/21/2021 | 42 CFR §440.70(f)(1) and 440.70(f)(2) | Medicaid providers | GRANTED | |
| DSS MO HealthNet | Effective with dates of service on or after January 1, 2020 and through the end of the public health emergency MO HealthNet is waiving the co-payment for ALL services. MO Healthnet will process a mass adjustment to remove the co-pay for claims with dates of service on or after January 1, 2020. | 1/20/2020-4/21/2021 | | Medicaid Providers | GRANTED | |
| DSS MO HealthNet | MO HealthNet to reimburse multi-function ventilators during COVID-19 emergency | 3/23/2020 - 3/31/2021 | | Medicaid providers | GRANTED | |

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|--------------------|--|-----------------------|-----------------------|--------------------|---------|---|
| MEDICAID | | | | | | |
| DSS MO HealthNet | <p>Telehealth:</p> <ol style="list-style-type: none"> 1) Waiver of the requirement that physicians must have an established relationship with the patient for telehealth; 2) Waiving the co-payment for any services provided by means of telehealth; 3) Telephone contacts may be used for telehealth services; 4) Providers quarantined or working from alternate sites or facilities may bill telehealth services; 5) MO HealthNet will reimburse out of state providers for telehealth if licensed in the state of residence. 6) Includes well child visits performed via telehealth. <p>Providers must still be enrolled as MHD providers through Missouri Medicaid Audit and Compliance (MMAC) to be reimbursed for telehealth services.</p> | 3/23/2020 - 3/31/2021 | | Medicaid providers | GRANTED | <p>MO HealthNet covers Telehealth services. Please find information regarding Telehealth here: https://dss.mo.gov/mhd/providers/pdf/bulletin41-20-2018.pdf. You can also view the Missouri Telehealth law here: 191.1145, 191.1146, 208.670, and 208.677. During this event, the MHD is allowing telehealth services to be provided to a MHD participant, while at home, using their telephone.</p> |

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| REIMBURSEMENT | | | | | | |
| State Waivers | | | | | | |
| DCI | <p>Bulletin 20-03 Department asks health carriers to waive any cost-sharing for COVID-19 laboratory tests. Health carriers are asked to review and ensure their telehealth programs and provider networks to ensure the ability to meet increased demand. Health carriers should not use preauthorization requirements as a barrier to access necessary treatment for COVID-19, and health carriers should be prepared to expedite utilization review and appeal processes for services related to COVID-19. Health carriers are asked to immediately cover immunization at no cost-sharing for all covered members. Health carriers are asked, where appropriate, to make expedited formulary exceptions if the insured is suffering from a health condition that may seriously jeopardize the insured's health, life, or ability to regain maximum function or if the insured is undergoing a current course of treatment using a non-formulary prescription drug.</p> | 3/3/2020 - 3/31/2021 | | Insurers | ISSUED 3/3/2020 | |
| DCI | <p>Bulletins 20-07 and 20-15 state the Director will not take enforcement action against any health carrier when the health carrier provides coverage for services provided via telehealth by a health care provider who is licensed in another state but not licensed in the state of Missouri. While section 376.1900.8, RSMo allows carriers to restrict coverage for telehealth services to those provided by in-network providers, carriers are strongly encouraged to implement this bulletin along with Bulletin 20-03, in an effort to broaden access to services provided via telehealth.</p> | 3/26/2020-6/15/2020 | | Insurers | Issued 3/26/2020 | |

| Agency Responsible | Description of Waiver | Duration of Waiver | Statute or Regulation | Application | Status | Notes |
|--------------------------------|--|-----------------------|---|---|---------|-------------------|
| HOME HEALTH AND HOSPICE | | | | | | |
| State Waivers | | | | | | |
| DHSS | Suspends home health inspections and investigations, except as necessary to maintain public health/IJ situations | 3/27/2020 - 3/31/2021 | 19 CSR 30-26.010(2)(E) & (H) | Home Health | GRANTED | |
| DHSS | Suspends hospice inspections and investigations, except as necessary to maintain public health/IJ situations | 3/27/2020 - 3/31/2021 | 19 CSR 30.35.030(2) | Hospice | GRANTED | |
| DHSS | Allows APRNs and PAs to order home health services at the residence of patients, including writing and signing treatment plans | 4/9/2020 - 3/31/2021 | 19 CSR 30-26.010(1)(A) | Home Health | GRANTED | |
| DHSS | Allows APRNs and PAs to serve as attending physician in hospice setting | 4/9/2020 - 3/31/2021 | 19 CSR 30-35.010(1)(A)(1) | Hospice | GRANTED | |
| DHSS | Waives requirements for hospice programs to provide dementia-specific training to employees | 4/22/2020 - 3/31/2021 | 19 CSR 30-35.010(2)(M)1B(XIII) | Hospice | GRANTED | |
| DHSS | Waives requirement for home health agencies to provide dementia-specific training until the conclusion of the state of emergency | 4/22/2020 - 3/31/2021 | 19 CSR 30-26.010(1)(B) | Home Health | GRANTED | |
| OTHER STANDARDS | | | | | | |
| State Waivers | | | | | | |
| DHSS | Extends deadline for annual licensure survey to August 1 | 3/27/2020 - 3/31/2021 | 192.230, RSMo and 33.030(1) | 19 CSR 10- Hospitals | GRANTED | |
| DHSS | Requires all COVID-19 test results to be reported to DHSS, not the local public health agency | 3/21/2020 - 3/31/2021 | 19 CSR 20-20.020(1), (6) and (8) | All providers testing for COVID-19 | GRANTED | |
| DHSS | Relieves hospital of requirement to report negative COVID-19 test results when testing is conducted by outside laboratory; only lab must make the report | 4/2/2020 - 3/31/2021 | 19 CSR 20-20.020(6) | Hospitals/Labs | GRANTED | |
| DHSS | Authorizes establishment of temporary emergency child care facilities | 3/20/2020 - 3/31/2021 | | Child care providers | GRANTED | Guidance Document |
| DMH | Alleviates requirements for conducting admission assessment within 72 hours for individuals with SUD receiving resident support or within first 3 outpatient visits, along with signature requirements on crisis prevention plan | 4/23/2020- 3/31/2021 | 9 CSR 10-7.030(2)(B) and (4)(A)(5) 9 CSR 30-3.100(6)(A)2 | SUD treatment providers | GRANTED | |
| DMH | Suspends requirement for initial comprehensive assessment and initial treatment plan by a community psychiatric rehabilitation program | 4/23/2020 - 3/31/2021 | 9 CSR 30-4.035(3) and (5) | Community psychiatric rehabilitation programs | | |