

BQC - 90 - 090

Date: November 1, 1990

To: All Wisconsin Long Term Care Facilities

From: Larry Tainter, Director
Bureau of Quality Assurance

Subject: Medicare Distinct Part Units

As a followup to a training session conducted by the Health Care Financing Administration (HCFA) for state survey agencies in Kansas City in early September, we issued BQC memo 90-078 describing the changes and new interpretations that were disseminated at that session. In item 10 of that memo we reported that HCFA staff had stated that Medicare certified distinct part units must have a separate registered nurse seven days a week, 8 hours a day and that this position could no longer be shared with the rest of the facility.

Since that time we have sought clarification of this requirement, and its regulatory basis, from HCFA but have not received a response. We understand that there is considerable debate within HCFA on this issue. Therefore, until we receive written direction from HCFA to the contrary, we will not be applying this requirement on surveys. We encourage those of you who operate Medicare distinct part units to continue to do so while this issue is under review in HCFA.

LT:SW:jmb

cc: Board on Aging & Long Term Care
Wisconsin Assoc. of Homes & Services for the Aging
Wisconsin Assoc. of Nursing Homes
Wisconsin Counties Association
Wis. Medical Records Assoc. Consultants Committee
Service Employees International Union
Wisconsin Coalition for Advocacy
Committee on Aging, Extended Care Facilities & HH Care (SMS)
Wisconsin Assoc. of Medical Directors
George F. MacKenzie
Director, Bureau of Health Care Financing
Administrator, Div. of Care & Treatment Facilities
Jerry Sandlin, HCFA, Chicago