



April 13, 2020

**SENT VIA EMAIL**

The Honorable Lawrence J. Hogan, Jr.  
Governor  
State of Maryland  
100 State Circle  
Annapolis, MD 21401

Fran Phillips  
Deputy Secretary  
Maryland Department of Health  
201 West Preston Street  
Baltimore, MD 21201

Dear Governor Hogan and Deputy Secretary Phillips:

As Maryland enters into Phase III of COVID-19, the acute care surge, skilled nursing and rehabilitation centers are dedicated to being part of the solution during this critical time and to protecting the health of all residents, patients, and staff in their centers.

In your leadership and throughout the healthcare continuum we have spoken with one voice to highlight the fact that together we are fighting COVID-19 in less than ideal conditions, and that PPE and testing challenges remain and are critical. Together, we are doing all we can. Dr. Deborah Birx, who leads the White House coronavirus response, suggested this past week that as more COVID-19 tests become available, nursing homes should be a top priority:

*"We need to really ensure that nursing homes have sentinel surveillance. And what do I mean by that? That we're actively testing in nursing homes, both the residents and the workers, at all times," Birx said.*

**A reminder specifically:**

- Ahead of your Executive Order, we advised skilled nursing and rehabilitation centers to create separate observation and isolation units, wings, or entire centers.
- Absent an adequate supply of testing, we are working with physicians, hospitals, providers from our sector, and the Maryland Hospital Association (MHA) to develop a clinical protocol for the transfer of clinically stable recovering COVID-19 patients to the post-acute setting.
- We have connected CRISP leaders with MHA and our sector to develop an automated reporting tool to identify skilled nursing and rehabilitation center capacity and share real-time data with MHA.

A survey of the sector conducted by HFAM indicates that about half of the skilled nursing and rehabilitation centers in Maryland have now created observation and isolation units; others are working to advance this with the physical limitations of their centers. Under our shared goal of protecting current skilled nursing center patients, these centers are a resource for the acute-care surge and reduction of COVID-19 hospital readmissions. **We make the following critical recommendation:**

- **Hospitals work with nursing homes to transfer clinically stable recovering COVID-19 patients only to those skilled nursing and rehabilitation centers with observation and isolation units, wings, or entire COVID-19 centers.**

Governor Hogan and Deputy Secretary Phillips

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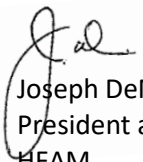
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As in our earlier letters, we continue to request that the Maryland Office of Health Care Quality (OHCQ) waive the 30-day involuntary discharge rules in order to proactively segregate COVID-19 patients from non-COVID-19 patients in preparation for an increase in hospital transfers at the peak of the care surge, and perhaps to create COVID-19 only centers.

Such COVID-19 only centers, which would likely be few in number, need enhanced PPE, testing, staffing, financial and cleaning remediation support.

We appreciate the efforts of local health offices and OHCQ to lift admissions bans relative to skilled nursing and rehabilitation centers with even a single positive COVID-19 case or a single infected staff member, but again **adequate PPE, testing, and additional funding in rates are key** to ensure that skilled nursing centers provide critical resources for the hospital acute-care surge while protecting both residents and staff.


Be well,



Joseph DeMattos  
President and CEO  
HFAM



Kevin Heffner  
President and CEO  
LifeSpan Network



Allison Ciborowski  
President and CEO  
LeadingAge Maryland

CC: The Honorable Robert R. Neall, Secretary, Maryland Department of Health  
The Honorable Dennis Schrader, COO & Medicaid Director, Maryland Department of Health  
Diane Croghan, Deputy Chief of Staff, Office of Governor Hogan  
Webster Ye, Director, Office of Governmental Affairs, Maryland Department of Health  
HFAM Board of Directors