Question: How will ASCs that participate in the "Hospital Without Walls" (HWW) initiative be utilized?

Answer: ASCs wishing to participate must at least temporarily become certified hospitals and likely function as surgical care hospitals where patients are admitted electively by surgeons who have already been performing cases at these facilities in the past. Patients admitted to the ASC under the HWW waiver should remain in the ASC until discharge unless the patient develops a complication which cannot be handled by the ASC such as the need for diagnostic imaging or critical care services.

Question: What is the expectation for ASCs when there are no patients in the facility or no planned overnight admissions?

Answer: If an ASC is participating in the HWW program as a hospital during the COVID-19 PHE and a surgeon desires to admit a patient after surgery post-anesthesia care, the surgeon would notify the facility of the need for an admission. Additionally, patients who are discharged home from the ASC but require readmission or observation care for routine complications such as hydration, pain management or other simple surgical issues should also be re-admitted to the ASC HWW. The on-call nurse request would be activated and a nurse would be available for patient admission and care.

Question: Do ASCs that are not temporarily enrolled as hospitals have to abide by the 24-hour admission requirement?

Answer: Yes, ASCs that are <u>not</u> temporarily enrolled as hospitals must remain in compliance with all non-waived federal ASC requirements, including the 24-hour admission limitation.

Question: Are those ASCs temporarily enrolled as hospitals subject to the 24 hour admission limitation?

Answer: No. The HWW initiative allows ASCs temporarily enrolled as hospitals to provide hospital services to help address the urgent need to increase hospital capacity to take care of patients. This includes surgical procedures that may require more than 24 hours of care/admission, with appropriate nurse coverage. Please be aware that this waiver of federal requirements does not supersede state law or administrative requirements that may limit ASC ability to act as a hospital under state law.